



414 Nicollet Mall
Minneapolis, MN 55401

September 26, 2025

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Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

—Via Electronic Filing—

RE: PETITION
APPROVAL OF PPAS FOR FIRM DISPATCHABLE RESOURCES
DOCKET NOS. E002/CN-23-212 AND E002/RP-24-67

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Petition to the Minnesota Public Utilities Commission requesting approval of the following agreements for projects approved by the Commission:¹

- **Invenergy – Cannon Falls:** an existing gas-fired facility consisting of two simple cycle combustion turbines, totaling 357 MW located in Cannon Falls, Minnesota.
- **Onward – Mankato Energy Center (MEC):** an existing gas-fired combined cycle facility, MEC 1, and a separate battery energy storage system (BESS) agreement at MEC 1. All components are located in Mankato, Minnesota.
- **DESRI – North Star Energy:** a new, 100 MW surplus BESS sited at the existing North Star Solar facility located in Chisago County, Minnesota.

Attached to this cover letter, we provide the required information as specified in Minn. R. 7829, including to whom information requests should be directed.

Portions of the Petition, and Attachments A, B, C, D and E in their entirety, are marked “Not-Public” as they contain information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). This data includes confidential

¹ *In the Matter of Northern States Power Company d/b/a Xcel Energy’s 2024-2040 Integrated Resource Plan and In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, MPUC Docket Nos. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications (IRP Order) at Order Points 1, 13, 14, and 15 (April 21, 2025).

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negotiation details, pricing and other contractual terms. The information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

Specifically, the model Power Purchase Agreement (PPA) is part of the public record through the filed and online Request for Proposal; this public availability creates a risk that developers could potentially infer the terms we negotiated by comparing the redacted versions to the full model PPA. Although they would not be able to determine the exact specifics of our negotiated terms, they could identify the categories of terms where we deviated from the standard in order to secure the project. This insight, when combined with the public information in our Petition, could adversely impact future contract negotiations and potentially increase costs for our customers. For these reasons, the agreements have been marked “Not-Public” in their entirety, and the Company maintains this information as a trade secret.

Additionally, the filing is provided with Critical Energy Infrastructure Information (CEII) redacted from the Public version as it contains contingency information related to or proposed to critical electric infrastructure, the incapacity or destruction of which would negatively affect national security, economic security, public health or safety, or any combination of such matters. Xcel Energy protects CEII as confidential Security Information as defined by Minn. Stat. § 13.37(1)(a), as its disclosure would be likely to substantially jeopardize the security of vital system information, and property against trespass, or physical injury or otherwise cause financial harm from its disclosure. Xcel Energy maintains this information as confidential pursuant to Minn. Rule 7829.0500, subp 2.

Attachments A, B, C, D and E are marked “Not-Public” in their entirety. Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

1. **Nature of the Material:** Attachments A, B, C and D are PDF copies of agreements between the Company and Sellers for purchases of power to produce electric service. Attachment E provides a comparison of final PPA price terms to the Settlement Agreement.
2. **Authors:** The agreements were drafted by Company’s and Sellers’ legal and business development personnel.
3. **Importance:** The agreements include confidential negotiation details, pricing and other contractual terms. The Sellers and the Company maintain this

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information as trade secret as it has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

4. **Date the Information was Prepared:** See the individual agreements for execution dates.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service lists. Please contact Shannon Whiton at shannon.whiton@xcelenergy.com or me at jody.l.londo@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

JODY L. LONDO
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosures
cc: Service Lists

REQUIRED INFORMATION

I. SUMMARY OF FILING

A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Commission. Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on the Department of Commerce and the Office of the Attorney General. A summary of the filing has been served on all parties on the enclosed service lists.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company doing business as:
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Ian M. Dobson
Lead Assistant General Counsel
Xcel Energy
414 Nicollet Mall, 401 – 8th Floor
Minneapolis, MN 55401
(612) 370-3578

C. Date of Filing

The Company submits this Petition on September 26, 2025 for approval.

REQUIRED INFORMATION

D. Statute Controlling Schedule for Processing the Filing

The PPAs are a result of a competitive resource bidding process and the end products of negotiations. No specific statute imposes a schedule controlling the processing of this filing. Under the Commission's Rules, this Petition falls within the definition of a "miscellaneous" filing under Minn. R. 7829.0100, subp. 11, since no determination of Xcel Energy's revenue requirement is necessary. Under Minn. R. 7829.1400, in the absence of a Commission notice establishing a different comment period, a person wishing to comment on a miscellaneous filing shall do so within 30 days of the miscellaneous filing.

E. Utility Employee Responsible for Filing

Jody L. Londo
Director, Regulatory and Strategic Analysis
Xcel Energy
414 Nicollet Mall, 401 – 7th Floor
Minneapolis, MN 55401
(612) 216-7954

IV. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission's official service list for this proceeding:

Ian M. Dobson
Lead Assistant General Counsel
Xcel Energy
414 Nicollet Mall, 401 – 8th Floor
Minneapolis, MN 55401
ian.m.dobson@xcelenergy.com

Christine Marquis
Regulatory Administrator
Xcel Energy
414 Nicollet Mall, 401 – 7th Floor
Minneapolis, MN 55401
regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to Christine Marquis at the Regulatory Records email address above.

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STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF POWER PURCHASE
AGREEMENTS FOR FIRM DISPATCHABLE
RESOURCES

DOCKET NO. E002/CN-23-212
DOCKET NO. E002/RP-24-67

PETITION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Petition for approval of the agreements that were negotiated between the Company and the bidders pursuant to the Settlement Agreement reached between parties in the above-referenced dockets, and as approved by the Commission in its April 21, 2025 Order.¹

These projects are expected to deliver benefits to our customers by providing the firm capacity and energy we need to serve them safely, reliably, and affordably. The agreements we present for Commission approval in this Petition:

- Provide needed capacity and energy for our system and serve our customers at a reasonable cost, with terms that sufficiently protect our customers from risks associated with the non-deliverability of capacity and/or energy from the projects.
- Are the result of negotiated terms designed to address and allocate project risk and clearly define costs for our customers.

¹ In the Matter of Northern States Power Company d/b/a Xcel Energy's 2024-2040 Integrated Resource Plan and In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation, MPUC Docket Nos. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications (IRP Order) at Order Points 1, 13, 14, 15, and 17 (April 21, 2025).

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- Include performance standards, milestone requirements, damages and remedies that help ensure our customers pay only for delivered and contracted capacity and energy.
- Balance affordability and reliability with protections against cost escalations, underperformance, and regulatory uncertainty.
- Support long-term planning goals and operating standards, while securing needed energy and capacity.

Specifically, we request that the Commission approve the agreements provided with this filing and:

- Authorize the Company to recover, through the Fuel Clause Rider, pursuant to Minn. Stat. § 216B.16 subd. 7(3), the Minnesota jurisdictional portion of the costs incurred under the Power Purchase Agreements (PPAs) and **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** from Minnesota retail customers.
- Establish a procedural schedule such that the Commission may complete deliberations by mid-January 2026. Earlier approval increases the likelihood that projects will qualify for the expiring tax incentives and reduces the risk of construction delays or project failure.

EXECUTIVE SUMMARY

With this filing, we are pleased to present the agreements successfully negotiated for projects approved by the Commission in the IRP Order, as follows:

- **Invenergy – Cannon Falls:** an existing gas-fired facility consisting of two simple cycle combustion turbines totaling 357 MW located in Cannon Falls, Minnesota.
- **Onward – Mankato Energy Center (MEC):** an existing gas-fired combined cycle facility totaling 375 MW (half of the project – MEC 1), and a new battery energy storage system (BESS) located in Mankato, Minnesota.
- **DESRI – North Star Energy:** a new, 100 MW surplus BESS sited at the existing North Star Solar facility located in Chisago County, Minnesota.

Despite a challenging landscape, including industry-wide cost pressures, global supply chain disruptions, labor market constraints, and evolving trade policies, our modeling of the final agreements demonstrates that the projects remain cost-effective and in the

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public interest. The final agreements result in a benefit of \$103 million on a Present Value Revenue Requirement (PVRR) basis, and a modest cost increase of \$33 million on a Present Value Societal Cost (PVSC) basis over the 2024-2050 timeframe.² Given the current challenges in the broader market as discussed in this Petition, we believe this modest PVSC impact is reasonable.

Following the Commission's IRP Order, National Grid Renewables Development, LLC (National Grid) withdrew the Plum Creek Wind + Storage project from the Settlement Agreement.³ The Company is actively pursuing alternative projects to replace the withdrawn bid. In addition, the Company continues to evaluate and negotiate Invenergy's bid for the Lake Wilson Solar and Storage project. As described further below, the project's supply chain is in early-stage development and Invenergy was unable to maintain the pricing in the original proposal. The Company continues to evaluate the project's viability, taking in consideration multiple price increases following bid submission, and other challenges that could materially affect the overall value and feasibility of the project. These considerations are part of our broader effort to ensure that all projects remain in the best interest of our customers and align with long-term system needs. Should the parties reach agreement and the project remain viable under these evolving conditions, the Company intends to submit a supplemental filing including the Lake Wilson PPA in the coming weeks.

As we discuss in more detail below, the final agreements incorporate robust performance guarantees and remedies for non-delivery, or failure to achieve commercial operation. For all projects, if performance continues to fall below the project's guarantees – for example, minimum capacity availability or round-trip efficiency – the Company would have certain rights to recover damages or eventually a right to terminate the agreement. These provisions ensure that seller operates and maintains the project reliably and aligns compensation with actual delivery of capacity and energy, minimizing costs for our customers.

The agreements are also structured to fairly allocate risks between the Company and the seller. Key risks – such as construction delays, underperformance, and certain changes in circumstance – are borne by the seller, with explicit caps on the Company's

² The Lake Wilson Solar and Storage project, the withdrawn Plum Creek Wind + Storage project, as well as any potential replacement projects are not included in the modeling. This cost also does not include any potential tariff risk discussed in Section IX.

³ In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 MW of Firm Dispatchable Generation and In the Matter of Xcel Energy's 2024-2040 Upper Midwest Integrated Resource Plan, Docket Nos. E002/CN-23-212 and E002/RP-24-67, National Grid Letter (April 25, 2025).

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exposure. The Company's cost obligations are limited to delivered capacity and can include reductions for underperformance. Except for the change in tariff costs provision outlined in Section IX below, and aside from common inflationary adjustments, the rates under these contracts are fixed for the duration of their respective terms.

Finally, the agreements include clear, enforceable provisions for delay and cancellation. If the seller fails to meet critical path milestones or fails to reach commercial operation, liquidated damages are owed to the Company, and the Company may be granted the opportunity to terminate the agreement after defined cure periods. The agreements also provide for termination in the event of extended force majeure or other excessive delays. These provisions are consistent with industry standards and provide strong incentives for timely project delivery while protecting our customers from undue risk.

Overall, these agreements provide needed capacity, energy, and resilience for our system, will serve our customers at a reasonable cost, and have terms that sufficiently protect our customers from risks associated with the non-deliverability of capacity and/or energy. The final agreements represent a critical step forward in securing reliable, dispatchable capacity for our customers during a period of accelerating demand and industry-wide cost pressures. Each agreement reflects a careful balance of affordability, risk mitigation, and operational flexibility, consistent with the Commission's directives in the IRP Order.

We respectfully request the Commission to approve the agreements as provided and detailed in this Petition.

I. DESCRIPTION AND PURPOSE OF FILING

The Company seeks approval of four agreements summarized in Table 1 below.

Table 1
Proposed Agreements

Project Name	Bidder/ Sponsor	Project Type	Nameplate Capacity	Project Cost
Cannon Falls Energy Center	Invenergy Renewables, LLC	Extension of Natural Gas Simple Cycle Combustion Turbines	357 MW	[PROTECTED DATA BEGINS]

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Project Name	Bidder/Sponsor	Project Type	Nameplate Capacity	Project Cost
Mankato Energy Center	Onward Energy Holdings, LLC	Extension of Combined Cycle (CC)	375 MW	
		New BESS	12 MW/48 MWh	
North Star Energy Storage	DESRI Renewable Energy Development, LLC	New surplus BESS	100 MW ⁴	PROTECTED DATA ENDS]

In the balance of this Petition, we:

- Discuss the state of the industry and market dynamics that affected our RFP solicitation and negotiations,
- Describe the resource acquisition process,

⁴ This project was originally bid as 80MW. See Section VII for discussion regarding the larger project size and associated lower pricing.

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- Provide information on lease arrangements,
- Provide an overview of the projects and a summary of key terms in the agreements for each project, highlighting how those terms are structured to protect our customers and reflect public interest,⁵
- Explain our economic and customer bill impact analysis that demonstrates that the proposed agreements are reasonable and in the public interest,
- Propose use of fuel and resource recovery clauses related to the purchases, and
- Describe the cost recovery mechanisms for the Company's self-build projects.

We also provide the following attachments in support of our Petition:

Table 2
Attachments

Attachment	Description
Attachment A	Cannon Falls PPA
Appendix A1	Cannon Falls Affidavit
Attachment B	Mankato Energy Center MEC 1 PPA
Attachment C	Mankato Energy Center BESS
Attachment D	North Star Energy BESS PPA
Attachment E	Comparison of Final PPA Pricing to Resource Plan Settlement Agreement

II. STATE OF THE INDUSTRY

The industry is experiencing sustained and overlapping cost pressures and uncertainty that are affecting the economics of both new and existing generation resources. Global supply chain disruptions, growing demand, labor market constraints, higher interest rates, evolving trade policies, and new tax regulations are collectively driving up the cost of project development and operations and have continued to fluctuate since bidders submitted their proposals in 2024. These factors in conjunction with global geopolitical uncertainty, have elevated project risk and contributed to adjustments in PPA pricing relative to original bids. Project-specific conditions, sensitivities, and mitigation strategies vary, and not all of these dynamics are the primary driver behind every price change. The discussion below addresses industry

⁵ As discussed in Sections III and VIII, the Company is still negotiating a PPA with Invenergy for Lake Wilson Solar and Storage project. We will file a supplement with the executed Lake Wilson PPA in the coming weeks if parties are able to reach terms.

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cost pressures and risks, while Sections V through VIII provide detailed, project-specific information, including pricing, key contractual terms, and performance mechanisms, all of which demonstrate that the proposed PPAs are reasonable and consistent with the public interest.⁶

A. Supply Chain Disruptions and Equipment Availability

Global supply chain constraints continue to pose persistent and well-documented challenges. Long lead times and elevated prices for key components – such as transformers and inverters – are disrupting project schedules and driving up overall costs. As recently noted by the Brattle Group, gas-fired generation projects, which typically take four to five years to develop, are now facing turbine supply chain constraints projected to persist through the end of the decade; consequently, limited additional gas-fired capacity is expected to come online before the early 2030s.⁷ With lead times for new gas-fired turbines now stretching from three to seven years due to surging demand, costs have sharply increased – rising as much as two-and-a-half times higher than just a few years ago.⁸

A June 2024 report by the President’s National Infrastructure Advisory Council (NIAC) identified a “critical shortage” of power transformers, with lead times more than doubling since 2021 due to pandemic-related production delays and increased demand across the energy sector.⁹ Developers have reported similar procurement challenges for high-voltage electrical equipment and solar modules, further straining project delivery times and budgets.

Figure 1 below presents two illustrative Producer Price Indices (PPI) published by the Federal Reserve Bank of St. Louis. These indices demonstrate the scale of recent cost

⁶ Id.

⁷ The Brattle Group, A Wide Array of Resources is Needed to Meet Growing U.S. Energy Demand at p. 3 (February 2025). Available at <https://www.brattle.com/wp-content/uploads/2025/02/A-Wide-Array-of-Resources-is-Needed-to-Meet-Growing-US-Energy-Demand.pdf>.

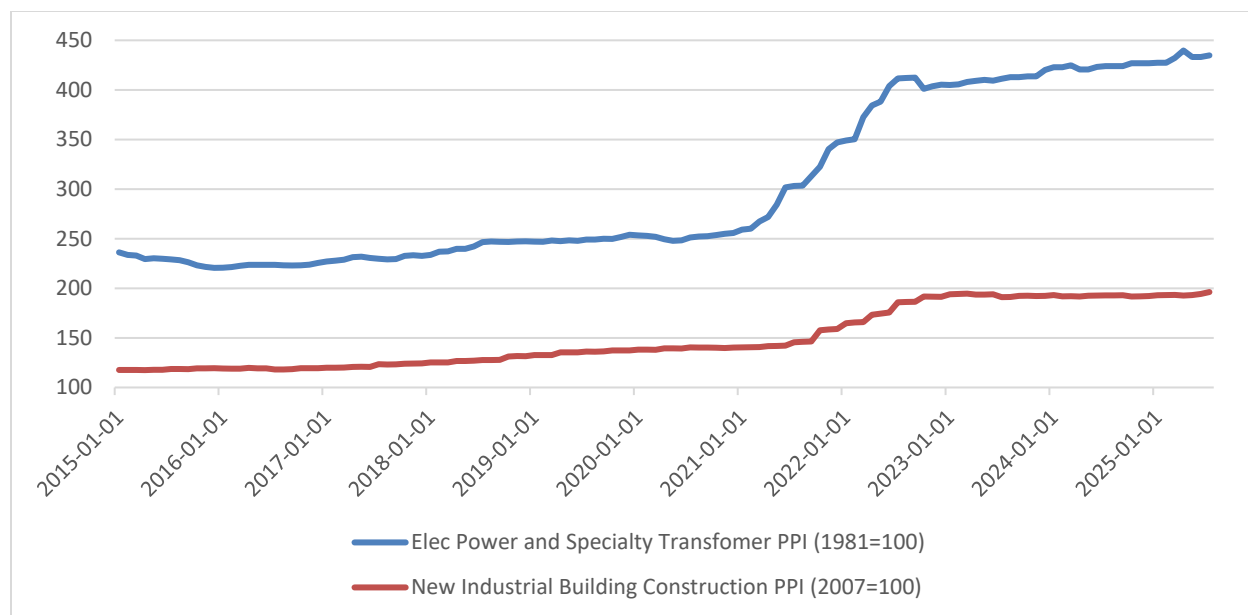
⁸ S&P Global, US Gas-Fired Turbine Wait Times as much as Seven Years; Costs up Sharply (May 20, 2025). Available at <https://www.spglobal.com/commodity-insights/en/news-research/latest-news/electric-power/052025-us-gas-fired-turbine-wait-times-as-much-as-seven-years-costs-up-sharply>.

⁹ NIAC, Addressing the Critical Shortage of Power Transformers to Ensure Reliability of the U.S. Grid, pp. 3-4 (June 2024). Available at https://www.cisa.gov/sites/default/files/2024-06/DRAFT_NIAC_Addressing%20the%20Critical%20Shortage%20of%20Power%20Transformers%20to%20Ensure%20Reliability%20of%20the%20U.S.%20Grid_Report_06052024_508c.pdf.

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escalations across broader segments of the U.S. economy, following a preceding period of relative price stability.

Figure 1
Illustrative Federal Reserve Producer Price Indices
for New Generation Projects¹⁰



The average PPI for Electric Power and Specialty Transformer Manufacturing from 2021 to year-to-date 2025 was 65 percent higher than the average from 2015 to 2020. For New Industrial Building Construction, it was 44 percent higher. These supply chain challenges continue to exert upward pressure on project costs and delivery times.

B. Generation Capacity Lagging Behind Demand Growth

Electricity demand is rising faster than at any point in the past three decades, increasing competition for generation resources and driving up market prices. A 2025 study prepared for the National Electrical Manufacturers Association (NEMA) projects a

¹⁰ U.S Bureau of Labor Statistics, Producer Price Index by Industry: Electric Power and Specialty Transformer Manufacturing [PCU335311335311P] retrieved from FRED, Federal Reserve Bank of St. Louis; and Producer Price Index by Industry: New Industrial Building Construction [PCU236211236211] retrieved from <https://fred.stlouisfed.org/series/PCU335311335311P>, <https://fred.stlouisfed.org/series/PCU236211236211>, (Retrieved August 18, 2025).

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50 percent increase by 2050, driven by accelerating electrification and growing data center loads.¹¹

In the Midcontinent Independent System Operator (MISO) region, the North American Electric Reliability Corporation (NERC) has classified MISO's risk as "elevated," with a shift to "high risk" projected in the 2028-2031 timeframe.¹² The firm dispatchable resources that we are seeking approval for in this petition – alongside the Company's broader efforts emerging from the IRP – are needed to ensure we have the capacity needed to reliably serve our customers.¹³

Further, in April 2025, MISO conducted its first Planning Resource Auction for Planning Year 2025-2026 using a Reliability-Based Demand Curve. This new pricing structure prioritizes system reliability and better reflects the increasing value of accredited capacity as the system approaches its minimum resource adequacy targets. The annualized capacity cost across all four seasons cleared at \$217/MW-day for the North/Central region. Notably, the auction cleared at \$666.50/MW-day for the summer season (June through August) across all of MISO's Resource Adequacy Zones – substantially higher than in previous years.¹⁴ MISO later acknowledged that a modeling error had inflated auction prices by approximately 20-30 percent.¹⁵ Even

¹¹ Utility Dive, US electricity demand will grow 50% by 2050, electrical manufacturer group says (April 10, 2025). Available at <https://www.utilitydive.com/news/us-electricity-demand-will-grow-50-by-2050-electrical-manufacturer-study/744575/>

¹² The 2024 NERC Long-Term Reliability Assessment initially identified MISO as being at high risk of capacity shortfalls beginning in Summer 2025, driven by a mismatch between new generation additions and retiring resources, alongside accelerating load growth. However, NERC later clarified that MISO had submitted mismatched data, which overstated near-term risk.

¹³ NERC, 2024 Long-Term Reliability Assessment, pp. 28-29 (December 2024). Available at https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_Long%20Term%20Reliability%20Assessment_2024.pdf. Also see: Statement on NERC's 2024 Long-Term Reliability Assessment (June 17, 2025). Available at <https://www.nerc.com/news/Pages/Statement-on-NERC%E2%80%99s-2024-Long-Term-Reliability-Assessment.aspx>.

¹⁴ See "MISO Planning Resource Auction Results for Planning Year 2025-26" at slide 2 (April 2025). Available at <https://cdn.misoenergy.org/2025%20PRA%20Results%20Posting%2020250428694160.pdf>.

¹⁵ MISO identified a software error in its Loss of Load (LOLE) calculations, where a third-party tool applied an "all hours" methodology instead of the Tariff-defined "daily peak hour" approach. This impacted the Planning Reserve Margin and resulted in inflated auction prices. Simulations using corrected LOLE inputs and adjusted RBDCs revealed that prices in the original PRA were approximately 20-30 percent higher than they would have been absent the modeling error. See "MISO Settlement Adjustments for LOLE Continuing Error" at slide 10 (September 3, 2025). Available at: <https://cdn.misoenergy.org/20250903%20SUG%20Item%2002%20Settlement%20Adjustments%20for%20LOLE%20Continuing%20Error%20Presentation716633.pdf>.

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with corrected modeling, however, the results highlight the need to bring new capacity online, as demand is expected to increase.

C. Rising Labor Costs and Workforce Constraints

Labor shortages and rising demand for energy infrastructure development are driving up labor costs across the industry. As utilities and developers work to meet growing electricity needs and replace retiring generation, competition for skilled construction labor has intensified. This has resulted in higher contractor pricing, increased schedule risks, and elevated overall project costs.

A recent industry update highlights that solar labor shortages are particularly acute in many states within the MISO region. Labor constraints are also increasingly impacting battery installations. Because a significant portion of battery installation work requires electrical expertise – and nearly all roles demand higher skill levels – the cost impact is especially pronounced. To address these challenges, many firms are investing in training and apprenticeship programs. However, industry leaders caution that scaling up the workforce will take time, even with proactive workforce development efforts.¹⁶ As large-scale projects continue to grow in number and complexity, the availability and cost of skilled labor is becoming a central factor in determining project feasibility, pricing, and execution timelines.

D. Impact of Elevated Interest Rates on Project Financing

Higher interest rates translate into increased borrowing costs and a higher cost of capital. This shift has significant impacts for the energy sector, where adding or replacing generation resources requires substantial, capital-intensive investments that often take years to bring online. As borrowing costs rise, so do the expenses associated with financing and constructing these projects.

On the construction side, elevated interest rates increase the carrying costs for equipment suppliers, which can, in turn, drive up overall project costs. On the financing side, developers typically rely on a mix of project debt, equity, and, in some cases, third-party tax equity or tax credit transfers. All of these financing components have become more expensive, raising the “hurdle rate” – the minimum return required to justify the investment. This is particularly challenging for developers who depend heavily on project-level debt as part of their capital structure. These elevated return thresholds may

¹⁶ Reuters, US solar, storage growth clipped by labor shortages (October 17, 2024). Available at <https://www.reuters.com/business/energy/us-solar-storage-growth-clipped-by-labor-shortages-2024-10-17/>.

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contribute to increased PPA pricing, depending on project-specific conditions and financing strategies.

E. Evolving Trade Policies Introduce Volatility in Project Development

Project costs have also been, and continue to be, affected by shifts in federal trade policy over the past year. In April 2025, the federal government implemented a sweeping set of tariffs, including a 10 percent baseline tariff on all imports and a 25 percent tariff on goods from Canada and Mexico. This action also raised tariffs on certain Chinese goods to as high as 145 percent. These measures directly affect steel, aluminum, solar panels, lithium-ion batteries, and other critical materials used in energy infrastructure.¹⁷

On August 7, 2025, the federal government activated a new round of reciprocal tariffs targeting nearly every country, marking a significant departure from long-standing trading norms.¹⁸ Regarding China, a temporary tariff truce reached in May 2025 was set to expire on August 12, 2025. However, the federal government announced a 90-day extension, delaying the reversion to higher tariff rates. This extension temporarily maintains the current 30 percent tariff rate on Chinese imports, providing short-term relief to markets that rely heavily on Chinese imports, including energy infrastructure components.¹⁹

Although some tariffs have since been paused or adjusted, others continue to evolve, and many remain in effect. Further, a subset – specifically those imposed under the International Emergency Economic Powers Act (IEEPA) – was ruled unlawful by the U.S. Court of International trade on May 25, 2025. Notably, the ruling applies only to tariffs enacted under IEEPA; product-specific tariffs, such as those on steel and aluminum, remain unaffected.²⁰ The decision is under appeal, leaving the status of the affected tariffs in legal flux.

¹⁷ AP News, Trump Imposes Sweeping Tariffs on All Imports, Shaking Global Markets (April 2, 2025). Available at <https://apnews.com/article/trump-tariffs-liberation-day-2a031b3c16120a5672a6ddd01da09933>.

¹⁸ MSN News, Map Tracker Reveals Trump's New Tariffs on Every Country (August 7, 2025). Available at <https://www.msn.com/en-us/money/markets/map-tracker-reveals-trumps-new-tariffs-on-every-country/art-AA1K506j>

¹⁹ CNBC, Trump Extends China Tariff Deadline by 90 Days (August 11, 2025). Available at <https://www.cnbc.com/2025/08/11/trump-china-tariffs-deadline-extended.html>.

²⁰ CNBC, Federal Trade Court Strikes Down Trump's Reciprocal Tariffs (May 30, 2025). Available at <https://www.cnbc.com/2025/05/29/court-strikes-down-trump-reciprocal-tariffs.html>.

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The timing of the tariff announcement presented some logistical challenges for project negotiations as well. These policies are not only increasing the cost of developing and maintaining energy assets but also introducing significant uncertainty into procurement and development processes. As trade policy continues to evolve, developers face heightened exposure to price volatility, supply chain risk and changes in regulation.

F. Modifications to Renewable Energy Tax Credit Provisions

The passage of Public Law No. 119-21, also known as the One Big Beautiful Bill Act (OBBBA), on July 4, 2025, introduces a significant restructuring of federal tax incentives for renewable energy development. The legislation imposes a phasedown of key tax credits that have historically supported the viability of wind, solar, and energy storage projects.

Under Public Law No. 119-21, wind and solar projects that do not begin construction by July 4, 2026 must be placed in service by December 31, 2027 to qualify for full tax credits. Wind and solar projects that begin construction by July 4, 2026 remain subject to U.S. Department of Treasury guidance that allows projects to qualify for full tax credits if placed in service by the end of the fourth calendar year following the year construction begins.

On July 7, 2025, President Trump issued an Executive Order directing the Treasury to issue “new and revised” guidance within 45 days, limiting the use of broad safe harbor provisions unless a substantial portion of the facility has already been constructed. In response, the U.S. Department of Treasury/Internal Revenue Service issued guidance reaffirming the four-year window to place projects in service. However, the guidance eliminated the previously available “Five Percent Safe Harbor” for most wind and solar projects. Instead, developers must satisfy the Physical Work Test, which requires that physical work of a significant nature commence under a binding written contract before a project can qualify as having begun construction.²¹

This change, along with the accelerated timeline for beginning construction on wind and solar projects, significantly narrows the pathway to eligibility and demands more rigorous documentation and project execution. Wind and solar projects that do not

²¹ IRS Notice 2025-42, “Beginning Construction Requirements for Purposes of the Termination of Clean Electricity Production Credits and Clean Electricity Investment Credits for Applicable Wind and Solar Facilities” Available at <https://www.irs.gov/pub/irs-drop/n-25-42.pdf>.

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begin construction by July 4, 2026 must be placed in service by December 31, 2027 to retain any credit eligibility.

This narrowing eligibility window has already begun to reshape market behavior. According to LevelTen Energy, the average cost of wind and solar PPAs increased by four percent in just the first month since the bill's passage. Procurement teams are accelerating timelines, with 68 percent reporting an urgent need to "act immediately" to secure resources, and 95 percent maintaining clean energy procurement as a top priority.²²

Energy storage projects, while not subject to the same immediate cutoff, face a gradual phaseout of incentives beginning in 2034. The credit value will decline incrementally – 75 percent in 2034, 50 percent in 2035, and fully sunset by 2036.²³ This timeline provides a longer runway for storage deployment but introduces long-term uncertainty for developers and investors.

The OBBBA also imposes new restrictions on the use of components sourced from foreign entities of concern (FEOCs), effective for projects beginning construction after December 31, 2025. These provisions are part of a broader effort to reduce reliance on Chinese supply chains and are expected to affect procurement.²⁴

The combined effect of these provisions is a narrowing window of opportunity for developers to secure tax credit eligibility. Projects currently in development must accelerate permitting, interconnection, and procurement activities to meet the statutory deadlines. Compounding this urgency is the fact that nearly one-third of developers are considering suspending or canceling projects due to the OBBBA, which will likely drive PPA prices even higher as supply tightens.²⁵

²² Utility Dive, Renewable Power Purchase Agreement Prices Rising in Wake of One Big Beautiful Bill Act (August 13, 2025). Available at <https://www.utilitydive.com/news/wind-solar-power-purchase-ppa-prices-obbb-levelten/757516/>.

²³ Basis, One Big Beautiful Bill: Final Impact Analysis on IRA Clean Energy Tax Credits (July 9, 2025). Available at <https://www.buildwithbasis.com/insights/one-big-beautiful-bill-final-impact-analysis-on-ira-clean-energy-tax-credits>.

²⁴ Id.

²⁵ Utility Dive, Renewable Power Purchase Agreement Prices Rising in Wake of One Big Beautiful Bill Act (August 13, 2025). Available at <https://www.utilitydive.com/news/wind-solar-power-purchase-ppa-prices-obbb-levelten/757516/>.

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III. RESOURCE ACQUISITION PROCESS

The Firm Dispatchable Docket originated from the Company's 2019 Integrated Resource Plan in Docket No. E002/RP-19-368 in which the Commission approved the plan with modifications and authorized a competitive resource procurement using the Track 2 bidding process. On May 24, 2023, the Company filed a Notice Petition for approval of the procurement structure, which the Commission approved with modifications on November 3, 2023. By January 22, 2024, 14 project bids from seven bidders were filed. The Commission conditionally accepted the bids on April 2, 2024, and referred the matter to the Office of Administrative Hearings for a contested case proceeding before Administrative Law Judge Jessica Palmer-Denig. During the proceeding, two bidders withdrew entirely, and one withdrew one of its two projects. On August 27, 2024, Judge Palmer-Denig suspended the procedural schedule to allow settlement negotiations.

Xcel Energy filed its 2024-2040 Upper Midwest Integrated Resource Plan (2024 IRP) on February 1, 2024. The Commission issued an Order on February 22, 2024 requiring a bill insert and referring the matter to the Office of Administrative Hearings for a public meeting – with the IRP to be heard by February 1, 2025. Initial comments were filed on August 9, 2024, indicating consistency on key issues, such as the need for significant renewable and storage resources and the extension of nuclear resources. The modeling also supported the reasonableness of many firm dispatchable resources bid into the Firm Dispatchable Docket. Following the comment period, parties engaged in settlement discussions, leading to the Department requesting an extension for reply comments, which the Commission granted, extending the deadline to October 11, 2024. In October 2024, the Company entered into a comprehensive settlement agreement (Settlement Agreement) with other settling parties to resolve issues related to both the Firm Dispatchable Docket and the 2024 IRP. Among other things, the Settlement Agreement included the selection of the following bids in the Firm Dispatchable Docket:²⁶

- Northern States Power Company Lyon County Generating Station,
- Northern States Power Company Sherco BESS,
- Onward Mankato Energy Center and BESS,

²⁶ In the Matter of Northern States Power Company d/b/a Xcel Energy's 2024-2040 Integrated Resource Plan and In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation, MPUC Docket Nos. E002/RP-24-67 and E002/CN-23-212, Joint Settlement Agreement (Oct. 3, 2024).

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- Invenergy Cannon Falls Energy Center,
- DESRI North Star Energy Storage,
- National Grid Renewables Development, LLC Plum Creek Wind + Storage, and
- Invenergy Lake Wilson Solar and Storage.

After further rounds of comments, the Commission met on February 18 and 20, 2025 to consider the Firm Dispatchable Docket, the 2024 IRP Docket, and the Settlement Agreement. On April 21, 2025, the Commission issued its Order Approving the Settlement Agreement with Modifications, in which the Commission approved the Settlement Agreement, the 2024 IRP, and ordered the Company to submit the negotiated PPAs with each bidder that is a settling party to the Commission within four months of the Order.²⁷

On April 25, 2025, National Grid Renewables Development, LLC (National Grid) filed a letter to the Commission notifying its decision to withdraw the Plum Creek Wind + Storage project from the Settlement Agreement, for reasons described in NGR's letter. Following discussions with remaining settling parties, the Company filed a subsequent letter on May 1, 2025, confirming that no additional parties intend to withdraw from the Settlement Agreement.

In response to the withdrawal of Plum Creek, Xcel Energy is actively pursuing **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** as a replacement project for Plum Creek. We anticipate bringing this replacement project to the Commission for approval in the coming months.

As part of the "Xcel-Bid Auditor/Modified Track 2" resource acquisition processes, the Company generally requires bidders to conform their proposals to the terms set forth in the model PPA published with the RFP. Where proposed amendments are determined to compromise the integrity of RFP, bidders are directed to withdraw such amendments; failure to do so results in bid rejection. In this instance of a "Contested

²⁷ In the Matter of Northern States Power Company d/b/a Xcel Energy's 2024-2040 Integrated Resource Plan and In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation, MPUC Docket Nos. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications (IRP Order) at Order Point 18 (Apr. 21, 2025).

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Case/Track 2” process, however, non-conforming bids were accepted, which naturally introduces complexity into negotiations regarding standard contractual terms.

In light of this procedural shift – and broader industry dynamics such as tariff volatility, supply chain constraints, and curtailment risks – the Company continues to actively evaluate the Lake Wilson Solar and Storage project and negotiate the associated PPA terms with Invenergy Renewables. If the Company determines the project remains in the best interest of our customers and the parties are able to resolve outstanding concerns, we will submit a supplement to this filing including the executed Lake Wilson Solar and Storage PPA in the coming weeks.

IV. LEASE ARRANGEMENTS

The Company’s proposed agreements are structured to provide reliable, dispatchable capacity at a reasonable cost, with enforceable performance standards and milestone requirements that protect customers from underperformance and cost escalation, as further described in Sections V-VII.

However, certain agreements for resources with dispatch rights and capacity-based payments, have the potential to create unintended long-term financial implications, which is the case with the agreements stemming from the firm dispatchable proceeding that we are requesting the Commission to approve. Specifically, these agreements can be treated as operating or finance leases. When assessing the Company’s financial risk, credit rating agencies may treat a portion of the future payments due on these agreements, or otherwise ‘lease obligations’ as *imputed debt*, effectively adding them to the Company’s reported debt, which provides the agency a more complete picture of its financial leverage.

When the credit rating agencies add these debt-like obligations to reported debt, key financial metrics, such as the cash flow to debt ratio, worsen. This change signals higher financial risk and can lead to lower credit ratings, which in turn increase the Company's borrowing costs on new debt. Given the Company's anticipated need to raise several billion dollars of long-term debt financing over the next five years, even marginal changes in the cost of debt will have material and sustained financial impacts on customers. Table 3 below presents the estimated amount of imputed debt and key credit ratio impacts expected by 2028, when all the contracts are active.

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Table 3
Estimated Credit Metric Impact

Project	Lease Type	2028 Imputed Debt (\$ million)	2028 Impact to FFO / Debt
Cannon Falls Energy Center	Finance	\$519	Approx. -1.05%
Mankato Energy Center	Finance	\$598	Approx. -1.10%
Mankato BESS	Finance	\$74	Approx. -0.15%
North Star Energy Storage	Operating	\$138	Approx. -0.20%
Total		\$1,329	Approx. -2.50%

The Company can mitigate the negative impact of incremental imputed debt through two primary avenues. Since ratings agencies closely monitor the relationship between cash flow from operations and total debt, the Company can either: (1) aim to reduce its overall debt burden, or (2) increase its operational cash flow. The debt burden could be reduced by managing the Company to a higher authorized equity ratio. Cash flow could be increased by either increasing return on equity (ROE) or accelerating book depreciation on capital assets. The equity ratio is the most cost-efficient option for managing credit quality, as it reduces the proportion of debt and increases cash flow, while displacing interest expense charged to customers.

Due to the material negative credit quality implications expected as a result of these contracts, the Company intends to propose mitigation through an increase in its equity ratio in its next electric rate case filing.

V. CANNON FALLS ENERGY CENTER

In this section we present an overview of the Cannon Falls Energy Center natural gas combustion turbine project and outline the key terms of the PPA with Invenergy Renewables LLC. We provide a copy of the Cannon Falls PPA as Attachment A.

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Separately, on July 24, 2025, the Commission, acting as the Relevant Electric Retail Regulatory Authority (RERRA), verified a portfolio of wind, solar, and storage projects proposed by Xcel Energy, Minnesota Power, and Otter Tail Power for inclusion in the MISO Expedited Resource Addition Study (ERAS) process.²⁸ These projects align with Integrated Resource Plans and Requests for Proposals and aim to address urgent reliability needs in Minnesota.

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While the Commission's verification confirms ERAS eligibility, it does not constitute final regulatory approval or a public interest finding. The Company intends to request formal approval for ERAS projects through a separate filing, anticipated in October 2025.²⁹

A. Cannon Falls Project Overview

Cannon Falls is a set of two gas-fired simple cycle combustion turbines, totaling 357 MW in size, located in Cannon Falls, Minnesota that began commercial operation in 2008. The turbines are also capable of operating on fuel oil as an alternative fuel source. Xcel Energy currently purchases the output of Cannon Falls under a pre-existing PPA that is scheduled to expire in 2028. The proposed Cannon Falls PPA extends the offtake arrangement between Invenergy and Xcel Energy under a new PPA, incorporating modifications to the price and other terms relative to the current PPA. Under the current and proposed PPAs, the Company has exclusive rights to dispatch the resource, with no minimum dispatch requirements. Cannon Falls has an

²⁸ Xcel Energy's proposed ERAS portfolio included projects being developed by third parties, such as the Invenergy capacity expansion project at Cannon Falls.

²⁹ For further discussion of the MISO ERAS process, our proposed projects, and next steps, see our September 12, 2025 Update Letter in Docket No. E002/RP-24-67.

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existing interconnection with the Greater Minnesota Transmission, LLC natural gas pipeline, and Xcel Energy is responsible for sourcing and securing the natural gas or fuel oil needed to operate for the facility. Project details for Cannon Falls are summarized in Table 4 below.

Table 4
Cannon Falls Project Details

Project Type	Natural Gas Simple Cycle CTs
Nameplate Capacity	357 MW
Developer	Invenergy Renewables, LLC
Project Location	Cannon Falls, Minnesota
Project Structure	PPA
COD	June 2028
Contract Terms	20 years
PPA Price	[PROTECTED DATA BEGINS
Capacity Price	
Energy Tolling Price	
Turbine Start Payment	
Fired-Hours Payment	PROTECTED DATA ENDS]

B. Cannon Falls PPA Terms

Cannon Falls provides needed system capacity with long-term price certainty for our customers. Through prudent contracting practices and during negotiations with Invenergy, we identified, assessed, and mitigated major risks while maximizing potential benefits through contract terms. As detailed below, while certain key terms may differ from the model PPA, they represent meaningful improvements over the current agreement.

1. Payment Rate

The Cannon Falls PPA provides price certainty for firm, dispatchable capacity and energy at a price of **[PROTECTED DATA BEGINS**

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DATA ENDS] for a 20-year term. The capacity payment is subject to adjustments for actual availability, as corrected for adverse ambient conditions. The monthly

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capacity payment **[PROTECTED DATA BEGINS**

PROTECTED DATA ENDS]. Capacity payments will be due regardless of the frequency, duration, times, or seasons in which the Company dispatches the project. In addition, the Company will make monthly payments to Invenergy based on the quantity of energy (MWh) the Company dispatches from the project, as well as the number of turbine starts requested by the Company to produce that energy.

2. *Customer Protections Added with Notable Improvements to Key Terms in Proposed PPA*

As summarized below in Table 5, the proposed Cannon Falls PPA incorporates a range of strengthened key terms compared to the current agreement, aimed at meaningfully reducing risk to our customers. These enhancements improve performance accountability and more closely align contractual obligations with real-world operating conditions. They are particularly important in ensuring the deliverability of capacity and energy, especially during heightened system conditions.

Notably, significant provisions absent from the current PPA – Permit Limitations, Availability Adjustment, Elevated System Condition (ESC) Adjustments – have been added to this new PPA. These terms reduce risk to our customers by tying compensation more meaningfully to operational performance and availability.

Additional protections include improved security requirements, stronger performance standards, cost-sharing for changes in law, and the inclusion of a Right of First Offer (ROFO) concept as detailed in Table 5. Together, the Availability and ESC adjustment mechanisms, combined with restrictions on maintenance scheduling, create strong incentives for the facility to remain operational during elevated conditions. These provisions also support the Company's ability to qualify the resource for MISO's Available Maximum Emergency (AME) accreditation, thereby enhancing its value and reliability within the regional market.

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**Table 5
Canon Falls PPA Term Improvements**

Term	Current PPA	Proposed New PPA
Permit Limitations	[PROTECTED DATA BEGINS	
Availability Adjustment		
ESC Adjustment		
Security		
Performance		
Force Majeure		
Change in Law		
ROFO		PROTECTED DATA ENDS]

Collectively, these improvements establish a comprehensive framework that protects our customers from the financial and reliability risks associated with non-deliverability of capacity and energy, while also aligning supplier incentives with system needs and regulatory expectations.

VI. MANKATO ENERGY CENTER

In this section we provide an overview of the Mankato Energy Center natural gas combined cycle combustion turbine, with a new BESS, and discuss the terms of the PPAs with Onward Energy Holdings, LLC.

A. MEC 1 Project Overview

MEC 1 is a 375 MW half of a combined cycle generation facility, located in Mankato,

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Minnesota that began commercial operation in 2006. The unit is also capable of operating on fuel oil as an alternative fuel source. Xcel Energy currently purchases the output of MEC 1 under a pre-existing PPA that is scheduled to expire in 2028. We provide a copy of the MEC 1 PPA as Attachment B. Notably, Xcel Energy also currently purchases the output from the other half of the combined cycle generation facility (MEC 2) under another pre-existing PPA that is scheduled to expire in 2039. Both the MEC 2 PPA and this new MEC 1 PPA will now expire simultaneously.

The proposal for the MEC 1 project with Onward consists of two distinct agreements that we outline in this section. The first is a new PPA that continues the existing offtake arrangement between Onward and the Company, incorporating updated pricing and revised terms relative to the current agreement. The second agreement is for a new BESS, as discussed in Section VI.C below. While these agreements are generally independent in structure and operational function, they naturally serve complementary roles in supporting system reliability and resource adequacy.

The MEC facility has an existing interconnection with the Northern Natural Gas Company interstate pipeline, and Xcel Energy is responsible for sourcing and securing the natural gas or fuel oil required for MEC 1 operations. Project details for MEC 1 are summarized in Table 6 below.

Table 6
MEC 1 Project Details

Project Type	Natural Gas Combined Cycle CT
Nameplate Capacity	375 MW
Developer	Onward Energy Holdings, LLC
Project Location	Mankato, Minnesota
Project Structure	PPA (CT)
COD	September 2028
Contract Terms	10 years and 9 months
Capacity Price	[PROTECTED DATA BEGINS
Energy Tolling Price	
Turbine Start Payment	
Fired-Hours Payment	PROTECTED DATA ENDS]

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B. MEC 1 PPA Terms

MEC 1 provides needed system capacity with long-term price certainty for our customers. Through prudent contracting practices and during negotiations with Invenergy, we have identified, assessed, and mitigated major risks while maximizing potential benefits through contract terms. As detailed below, while certain key terms may differ from the model PPA, they represent meaningful improvements over the current agreement.

1. MEC 1 Payment Rate

The MEC 1 PPA provides price certainty for firm, dispatchable capacity and energy at a price of **[PROTECTED DATA BEGINS**

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for a 10-year and 9-month term. The capacity payment is subject to adjustments for actual availability, as corrected for adverse ambient conditions. This structure ensures that the seller is incentivized to maintain high availability and reliability. Capacity payments will be due regardless of the frequency, duration, times, or seasons in which the Company dispatches the project. In addition, the Company will make monthly payments to Onward based on the quantity of energy (MWh) received from the project and the number of turbine starts requested by the Company to produce that energy.

2. Customer Protections Added with Notable Improvements to Key Terms in Proposed MEC 1 PPA

As summarized below in Table 7, the proposed MEC 1 PPA incorporates a range of strengthened key terms compared to the current agreement, aimed at meaningfully reducing risk to our customers. These enhancements improve performance accountability and more closely align contractual obligations with real-world operating conditions. They are particularly important in ensuring the deliverability of accredited capacity and energy, especially during heightened system conditions.

Notably, significant provisions absent from the current PPA – Permit Limitations, Elevated System Condition (ESC) Adjustments, and Performance (Availability) Minimums – have been added to the new PPA. These terms reduce risk to our customers by tying compensation more directly to operational performance and availability.

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Additional protections include enhanced security requirements, stronger performance standards, cost-sharing for changes in law, and more clear assignment and sale protections, as detailed in Table 7 below. Together, the Availability and ESC adjustment mechanisms, combined with limitations on maintenance scheduling, create strong incentives for the facility to remain available during elevated conditions. These provisions also support the Company's ability to qualify the resource for MISO's Available Maximum Emergency (AME) accreditation, thereby enhancing its value and reliability within the regional market.

Table 7
MEC 1 PPA Term Improvements

Term	Current PPA	Proposed PPA Extension
Permit Limitations	[PROTECTED DATA BEGINS	
ESC Adjustment		
Assignment/Change of Control		
Security		
Performance		
Change in Law		
ROFO		PROTECTED DATA ENDS]

Collectively, these improvements establish a comprehensive framework that protects our customers from the financial and reliability risks associated with non-deliverability of capacity and energy, while also aligning supplier incentives with system needs and regulatory expectations.

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C. MEC BESS Project Overview

The MEC BESS (12 MW/48 MWh lithium-ion battery sited at the Mankato facility) **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]**. We provide a copy of the associated agreement as Attachment C.

Project details are summarized in Table 8 below.

Table 8
MEC BESS Project Details

Project Type	BESS
Nameplate Capacity	12 MW/48 MWh
Developer	Onward Energy Holdings, LLC
Project Location	Mankato, Minnesota
Project Structure	Agreement
COD	September 1, 2028
Contract Terms	10 years and 9 months
Payment	[PROTECTED DATA BEGINS PROTECTED DATA ENDS]

D. MEC BESS Agreement Terms

The Mankato BESS agreement provides price certainty and operational reliability for the Company's system. The agreement includes enforceable performance standards, milestone requirements, and remedies that ensure that our customers pay only for the delivered and contracted service. Section IX outlines relief mechanisms – offered to all selected bidders with new construction resources – to address geopolitical uncertainties such as trade measures, tax law changes, and federal permitting delays, ensuring project viability and protecting both the Company and Sellers from extraordinary external risks.

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1. *MEC BESS Price*

The **[PROTECTED DATA BEGINS**
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2. *Performance Adjustment Mechanisms*

The agreement includes robust performance guarantees and remedies for non-delivery, as described below in Table 9. These provisions are designed to protect our customers from financial and reliability risks associated with non-performance.

Table 9
Performance Terms

Term	Adjustment
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³⁰ Rates are subject to adjustment based on new changes to tariffs imposed on the projects components as described further in Section IX.

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VII. NORTH STAR ENERGY STORAGE

This section provides an overview of the North Star Energy Storage project and outlines the key terms of the PPA agreement with DE Shaw Renewable Investments, LLC (DESRI). A copy of the North Star BESS PPA is included as Attachment D.

A. North Star BESS Project Overview

The North Star surplus BESS PPA with DESRI adds storage capacity to the existing 100 MW North Star Solar Facility. The project will be located in Chisago County, Minnesota, and sited adjacent to the existing North Star Solar substation.

The project was initially proposed as an 80 MW facility under a 15-year term. During negotiations, parties reached terms to increase the project size to 100 MW in exchange for a reduced per-unit cost. The North Star surplus BESS PPA provides price certainty for firm, dispatchable capacity at a price of **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]**. The Company requests approval of the 100 MW configuration, which offers more firm capacity at a lower per-unit price. Should the Commission order the project remain at 80 MW, the price shall revert to **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]**.

The BESS will interconnect to the grid through a shared infrastructure arrangement, utilizing existing transmission facilities and surplus interconnection capacity associated with the existing North Star Solar facility. The Solar facility has an existing interconnection for 100 MW. DESRI successfully obtained 80 MWs of surplus interconnection to accommodate the BESS. This approach enables the integration of the BESS without requiring significant system upgrades. To accommodate the additional 20 MW for the guaranteed storage capacity, DESRI will apply for 20 MWs of additional surplus interconnection service with MISO. The additional 20 MWs of capacity under the PPA is conditioned on DESRI successfully obtaining an amendment to the surplus interconnection reflecting the full 100 MW capacity.

Project details for North Star BESS are summarized in Table 10 below.

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Table 10
North Star BESS Project Details

Project Type	BESS
Nameplate Capacity	100 MW/400 MWh (or 80 MW/320 MWh)
Developer	DESRI, LLC
Project Location	Chisago County, Minnesota
Project Structure	PPA
COD	May 30, 2027
Contract Terms	15 years
Capacity Price	[PROTECTED DATA BEGINS PROTECTED DATA ENDS]

B. North Star BESS PPA Terms

The North Star BESS project provides needed system capacity with long-term price certainty for our customers. Through prudent contracting practices and during negotiations with DESRI, we have identified, assessed, and mitigated major risks with maximizing potential benefits through the contract terms. Section IX outlines relief mechanisms – offered to all selected bidders with new construction resources – to address geopolitical uncertainties such as trade measures, tax law changes, and federal permitting delays, ensuring project viability and protecting both the Company and Sellers from extraordinary external risks.

1. Payment Rate

The 100 MW/400 MWh North Star BESS PPA includes fixed capacity payments of **[PROTECTED DATA BEGINS** **PROTECTED DATA ENDS]** for a 15-year term.

2. Performance Adjustment Mechanisms

The North Star Storage PPA includes several performance-based adjustment mechanisms that align with the RFP model PPA. Performance provisions are designed to ensure that the facility delivers reliable, high-quality service and that payments to the Seller are aligned with actual performance. These mechanisms, described below, are structured to align Seller compensation with actual system

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performance, incentivize high availability and efficiency, and provide flexibility for operational realities.

a. Capacity Availability Factor (CAF) Adjustment

The monthly capacity payment varies based on the actual availability of the project each month. The CAF reflects the actual available capacity of the battery storage system, adjusted for scheduled maintenance. If the facility is unavailable due to forced outages or underperformance, the Seller's payment will be reduced accordingly. This mechanism incentivizes the Seller to maximize system availability and reliability throughout the contract term.

b. Round Trip Efficiency Adjustment

The contract requires the battery storage system to meet its committed round-trip efficiency (RTE) levels each year. RTE is the ratio of energy discharged compared to energy charged reflecting the efficiency of the project's charging capabilities. If the actual RTE, falls below the guaranteed levels, the monthly payment is reduced. This ensures that the Seller is financially motivated to maintain the battery's efficiency over time.

c. Excess Throughput

If the North Star battery is discharged above the annual throughput limit, the Seller is entitled to an additional payment for each megawatt-hour (MWh) of excess energy delivered. This payment is set at **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** for energy discharged above the annual throughput limit, providing an incentive for the Seller to make the system available even beyond its planned throughput, while also protecting the facility from overuse that could degrade the asset.

d. Penalties for Failure to Respond to Dispatch

If the Seller fails to accurately or timely respond to a dispatch notice, and the market operator imposes a penalty or charge on the Company as a result, the Company may pass through those charges to the Seller by reducing the next monthly payment.

3. *Critical Path Development Milestones*

The PPA requires achievements of certain milestones that are critical to the successful

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and timely development of the project, referred to as “Critical Path Development Milestones.” If North Star misses or is anticipated to miss a critical milestone, it must establish a recovery plan to restore the project’s schedule. Further, if North Star fails to reach these critical milestones by the respective deadlines, it will be subject to liquidated delay damages. If the project fails to achieve COD by its target, it will again be subject to liquidated delay damages. And if it fails to achieve COD altogether, the Company can terminate and collect damages for termination.

4. *Security Fund*

North Star is required to fund and maintain security in favor of the Company following execution and throughout development and the term of the contract (Security Fund). The Company may draw from this Security Fund to recover amounts owed to the Company for liquidated delay damages, actual damages, and liquidated damages for failure to reach the Critical Path Development Milestones or failure to achieve COD.

5. *Resource Attributes Conveyed to the Company*

The North Star Storage PPA ensures that the Company receives all capacity and environmental attributes from the project. This ensures that the Company is able to count the project’s accredited capacity toward its planning requirements.

6. *Labor*

The RFP required all bidders to utilize union labor for the construction of the facility, and such remains a provision of the proposed PPAs as well.

VIII. LAKE WILSON SOLAR AND STORAGE ENERGY CENTER

The proposed Lake Wilson Solar and Storage Energy Center bid is for a 150 MW solar generating facility and 95 MW/380 MWh BESS, located in Murray County, Minnesota. The project is being developed by Invenergy Renewables.

As discussed earlier, the Company has yet to reach terms with Invenergy for the Lake Wilson Solar and Storage project. The Company continues to evaluate the project’s viability, taking in consideration multiple price increases following bid submission, and other challenges that could materially affect the overall value and feasibility of the

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project. These considerations are part of our broader effort to ensure that all projects remain in the best interest of our customers and align with long-term system needs.

The Company continues to actively evaluate the viability of the project in light of broader industry challenges, and despite the relief mechanisms offered and described in Section IX below, parties remain hesitant to move forward. If the parties are able to resolve the remaining issues and the Company determines the project remains in the best interest of our customers, a supplement including the executed Lake Wilson Solar and Storage PPA will be filed in the coming weeks.

IX. RELIEF MECHANISMS ASSOCIATED WITH GEOPOLITICAL UNCERTAINTY

As detailed above, the industry is facing tremendous uncertainty. This unprecedented uncertainty includes uncertain trade measures, tariff imposition, tax credits, tax qualifications, federal permitting, import restrictions and foreign entity concerns just to name a few. As such, the Company recognizes that granting practical and limited relief mechanisms in an effort to stabilize and promote the continued development of new resources is necessary and prudent at this time. Generally, the Company determined that three primary components currently are driving geopolitical uncertainty for the projects. First, everchanging tariffs and trade measures make it very challenging to lock in definitive equipment costs for project development. Second, the undeniable scrutiny on tax incentives for renewable energy development recently has made committing to a project's economics difficult without tremendous financial risk. And third, federal action challenging project permitting not only threatens a project's schedule but ultimately could prevent a project from being constructed altogether.

In consideration of the above, each of the new construction resources in this portfolio (North Star BESS and MEC BESS) has been granted the relief mechanisms summarized below. The relief incorporates a comprehensive set of mechanisms joined with practical safeguards designed to address regulatory uncertainty, evolving reliability standards, and macroeconomic disruptions. These relief mechanisms provide a balanced framework that protects both the Seller and the customer from extraordinary external risks while supporting project viability and promoting timely delivery of the projects and their contracted services. The relief mechanisms are consistent with those offered to all selected bidders in the firm dispatchable proceeding.

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A. Specified Change in Tax Law

If a change in tax law (for example, a repeal of a clean energy tax credit) prevents the Seller from realizing investment or production tax credit benefits, and the financial impact on the project exceeds a material threshold relative to the size of each project, then Seller has the opportunity to exit the contract, forfeiting a portion of their security. Prior to termination, both parties must engage in a 90-day negotiation period to amend the PPA in an effort to continue with the project prior to terminating. The Seller can be granted up to 75 days of COD delay during the process. Any such change in tax law triggering this relief is subject entirely to verification by an Independent Auditor.

B. Extraordinary Federal Action

If the Seller is unable to reach COD due to a federal permit being withheld or denied, the Seller is granted a day-for-day extension. For example, if a presidential executive order withholding the project's construction permit causes the delay or otherwise makes construction impossible, then the Seller may extend their planned in-service dates to allow additional time to obtain such permit. If the delay continues and COD still cannot be achieved within a year, then either party has the opportunity to exit the contract without penalty.

C. New Trade Measure Event

If a new or modified import tariff is imposed on the project's major components, the Seller may request a rate increase, capped at no more than 20 percent, to account for the change in tariff impact on the project. Each new tariff and requested rate increase must be verified by an Independent Auditor. The Independent Auditor shall be granted the opportunity to review Seller's major equipment and determine the validity and impact of any new tariff. If the Independent Auditor denies the new tariff, or if Seller's calculation of the rate increase is determined by the Independent Auditor as materially inaccurate or otherwise in bad faith, no rate increase will be granted. The Seller has the right to submit multiple requests for different tariff events and is granted up to 75 days of COD delay during the review process. If the Independent Auditor verifies the new tariff event and also verifies Seller's calculation of the rate increase, then the rate increase will be automatically applied to the PPA for the remainder of the term.

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X. THE PROPOSED PPAS ARE REASONABLE AND IN THE PUBLIC INTEREST

The IRP Order requires that the evaluation of these PPAs include, but not be limited to, whether:

- a. the prices and terms put ratepayers at risk for costs that are higher than bid or for benefits assumed in bids that do not materialize;*
- b. the agreement had terms which sufficiently protected ratepayers from risks associated with the non-deliverability of accredited capacity and/or energy from the project(s) as proposed;*
- c. the terms of any agreement that inappropriately shifted risk or unknown costs to ratepayers; and*
- d. the reasonableness of delay and cancellation provisions.³¹*

We discuss each of these evaluation criteria below.

A. The PPA Prices and Terms Protect Ratepayers from Costs Exceeding Bids and Ensure Benefits Assumed in the Bids are Realized

As described in Section II, the PPAs were negotiated in the context of significant industry-wide cost pressures, including supply chain disruptions, labor shortages, and evolving trade policies. Global supply chain disruptions, growing demand, labor market constraints, higher interest rates, and evolving trade policies are collectively driving up both the cost of project development and operational costs. These factors have led to some increases in project costs relative to original bids. However, as discussed below, the economic analysis was refreshed to reflect updated pricing, and the Company's modeling demonstrates that the projects remain cost-effective and in the public interest.

Despite these headwinds, the proposed PPAs remain critical to meeting our customers' growing energy and capacity needs. As described in Sections V-VII, the agreements include fixed or formula-based pricing, with escalation factors clearly defined, and performance-based payment adjustments to ensure that our customers only pay for delivered capacity and energy. The agreements also include mechanisms to adjust payments downward if performance metrics are not met, ensuring benefits assumed in bids are realized in practice.

³¹ IRP Order at Order Point 19.

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1. *Economic Analysis*

The analysis supporting the Commission-approved Settlement Agreement in the 2024 IRP included EnCompass modeling supporting the selected resources. Since the time of the Settlement, the cost of the projects has increased due to the confluence of factors described in Section II.³² In order to assess the impact of these changes in cost, we have re-run the EnCompass model to update the Present Value of Social Cost (PVSC) and Present Value of Revenue Requirement (PVRR) as shown in Table 11 below:

Table 11
Updated Scenario 1 PVSC / PVRR (\$2024 millions)

PVSC	Delta from Updated Base in NPV 2024-2050 (\$ million)	NPV 2024-2050 (\$ million)
Lyon Co CT CON	-	\$68,839
Updated Base - Updated Lyon Co CT CON	\$0	\$69,043
Final 800 MW Portfolio	\$150	\$69,194
PVRR	Delta from Updated Base in NPV 2024-2050 (\$ million)	NPV 2024-2050 (\$ million)
Lyon Co CT CON	-	\$50,103
Updated Base - Updated Lyon Co CT CON	\$0	\$49,910
Final 800 MW Portfolio	\$153	\$50,063

To update the EnCompass modeling, we created an updated base case. The updated base case relies on the EnCompass modeling submitted in the Lyon County CT Certificate of Need (CON) filing and removes the Plum Creek wind resource that subsequently withdrew.³³ The cost of the MEC BESS is also included in the updated base case.

³² A comparison of the final PPA price terms to the Settlement Agreement is included as Attachment E.

³³ See Combined Application for a Certificate of Need, Site Permit, Transmission Line Route Permit, & Partial Exemption and Pipeline Routing Permit for the Lyon County Generating Station Project, Docket Nos. E002/CN-25-145, G002/GS-25-154, E002/TL-25-161 and G002/GP-25-163 (May 9, 2025).

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The updated base case can then be compared to the “Final 800 MW Portfolio” which includes the updated PPA pricing as well as the 20 MW increase in the size of North Star BESS. On a PVSC basis, this change results in an increase of \$150 million on a PVSC basis and \$153 million on a PVRR basis over the 2024-2050 timeframe, which is an increase of approximately 0.2 percent relative to total system costs. Given the current challenges in the broader market as discussed above, we believe this modest impact is reasonable.

As noted above, we are continuing to negotiate with Invenenergy Renewables for the Lake Wilson Solar and Storage project. As we are not specifically requesting approval of Lake Wilson in this petition, we have performed EnCompass modeling to analyze the impacts of removing Lake Wilson in Table 12 below:

Table 12
PVSC / PVRR (\$2024 millions) With and Without Lake Wilson
Solar and Storage Project

PVSC	Delta from Updated Base in NPV 2024-2050 (\$ million)	NPV 2024-2050 (\$ million)
Updated Base - Updated Lyon Co CT CON	\$0	\$69,043
Final 800MW - No Lake Wilson	\$33	\$69,076
PVRR	Delta from Updated Base in NPV 2024-2050 (\$ million)	NPV 2024-2050 (\$ million)
Updated Base - Updated Lyon Co CT CON	\$0	\$ 49,910
Final 800MW - No Lake Wilson	(\$103)	\$ 49,808

As discussed above, if the parties are able to resolve the outstanding issues and the Company determines the project remains in the best interest of our customers, a supplemental filing including the executed Lake Wilson Solar and Storage PPA will be filed in the coming weeks. As shown in Table 12 above, when Lake Wilson is removed, our modeling shows the portfolio of projects--MEC, Cannon Falls and North Star – provide benefits to our system on a PVRR basis and modest costs on a PVSC basis compared to the updated base case.

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B. The Agreements have Terms that Sufficiently Protect Ratepayers from Risks Associated with the Non-deliverability of Accredited Capacity and/or Energy from the Projects

The agreements incorporate robust performance guarantees and remedies for non-delivery as discussed in Sections V through VII. For new construction, if a project fails to achieve commercial operation by the target date, liquidated damages are owed to the Company, and the Company may terminate the agreement after defined cure periods. For all projects, if performance falls below contractual thresholds – such as minimum capacity availability or round-trip efficiency – the Company has the right to terminate the agreement and recover damages, including the right to purchase the facility at fair market value in the event of seller default. These provisions ensure that seller compensation directly align seller compensation with actual delivery of accredited capacity and energy, minimizing risk to our customers.

C. The Terms of the Agreements Fairly Distribute Risk and Clearly Define Costs for Ratepayers

The agreements are structured to fairly allocate risks between the Company and the seller. Key risks – such as construction delays, underperformance, and certain changes in law – are borne by the seller, with explicit caps on the Company's exposure. For example, for new construction, with the relief mechanisms described in Section IX, the seller is responsible for all costs associated with construction, permitting, and achieving commercial operation, and must post substantial security to guarantee performance. The Company's payment obligations are limited to delivered capacity, with reductions for underperformance. While some cost escalation is permitted (e.g., for inflation or certain regulatory changes), these are formulaic and transparent, and the agreements include caps and cost-sharing provisions for changes in law or tariffs.

D. The Delay and Cancel Provisions are Reasonable

The PPAs include clear, enforceable provisions for delay and cancellation. If the seller fails to meet critical path milestones or commercial operation deadlines, liquidated damages are owed to the Company, and the Company may terminate the agreement after defined cure periods. In the event of seller default, the Company may recover damages up to a defined cap. The agreements also provide for termination in the event of extended force majeure, with clear procedures for return of security and allocation of costs. These provisions are consistent with industry standards and

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provide strong incentives for timely project delivery while protecting our customers from undue risk.

XI. EFFECT OF CHANGE UPON XCEL ENERGY REVENUE

Pursuant to Minn. Stat. § 216B.16 subd. 7(3), the costs for “fuel used in generation of electricity” are eligible for automatic adjustment under the Fuel Clause Rider. Under the terms of our currently effective Fuel Clause Rider in our tariff, “[t]he energy cost of purchases from a qualifying facility” are “qualifying costs” that comprise the Cost of Energy. Because the projects satisfy the conditions of a qualifying facility, the Company plans to recover the costs of these agreements through our Fuel Clause Rider. No net increase in revenue to Xcel Energy will result from these transactions, as the power purchases will equal the revenue collected.

XII. SELF-BUILD PROJECT STATUS

As previously noted, the IRP Order approved two self-build projects: (1) the Lyon County Generating Station and (2) the Sherco West BESS.³⁴ Below, we provide an update on the status of each project and the planned approach for cost recovery.

A. Lyon County Generating Station

As directed in the IRP Order, the Company filed a Combined Application for a Certificate of Need, Site Permit, Transmission Line Route Permit, & Partial Exemption and Pipeline Routing Permit for the Lyon County Generating Station Project on May 9, 2025.³⁵ The Company plans to seek cost recovery for the project through a future rate case.

B. Sherco West BESS

The Company anticipates submitting a site and route permit application to the Commission for the Sherco West BESS project in October 2025. We intend to

³⁴ IRP Order at Order Point 11 and 12.

³⁵ IRP Order at Order Point 1a. See Combined Application for a Certificate of Need, Site Permit, Transmission Line Route Permit, & Partial Exemption and Pipeline Routing Permit for the Lyon County Generating Station Project, Docket Nos. E002/CN-25-154, E002/TL-161, G002/GS-25-154, and G002/GP-25-163, (May 9, 2025).

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recover costs associated with the Sherco West BESS project through the Renewable Energy Standard (RES) Rider, pursuant to Minn. Stat. § 216B.1645. The Sherco West BESS is designed to support the integration, reliability, and optimization of renewable energy resources across the Company's system. The project aligns with the statutory intent and Commission precedent for cost recovery under the RES Rider and will contribute to the Company's – and the State's – broader strategy of enabling higher renewable penetration and grid decarbonization.

CONCLUSION

The proposed agreements represent a critical step forward in securing reliable, dispatchable capacity for our customers. Each agreement reflects a careful balance of affordability, risk mitigation, and operational flexibility, consistent with the Commission's directives in the IRP Order.

These PPAs will provide needed capacity and energy for our system and serve our customers at a reasonable cost, with terms that sufficiently protect our customers from risks associated with the non-deliverability of capacity and/or energy from the project(s).

For these reasons, we respectfully request that the Commission take the following actions:

- Find that the proposed agreements are in the public interest.
- Approve the proposed agreements:
 - **Invenergy – Cannon Falls:** a set of two, existing gas-fired combustion turbines, totaling 357 MW located in Cannon Falls, Minnesota
 - **Onward – Mankato Energy Center (MEC):** an existing 375 MW natural gas combined cycle facility, MEC 1, and a separate agreement for a new BESS. All components are located in Mankato, Minnesota.
 - **DESRI – North Star Energy:** a new, 100 MW BESS added to the existing North Star Storage facility located in Chisago County, Minnesota.
- Authorize the Company to recover, through the Fuel Clause Rider, pursuant to Minn. Stat. § 216B.16 subd. 7(3), the Minnesota jurisdictional portion of the costs incurred under the agreements from Minnesota retail customers.

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- Establish a procedural schedule such that the Commission may complete deliberations by mid-January 2026. Earlier approval increases the likelihood that projects will qualify for tax credits and significantly reduces the risk of construction delays or project failure.

Dated: September 26, 2025

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF POWER PURCHASE
AGREEMENTS FOR FIRM DISPATCHABLE
RESOURCES

DOCKET No. E002/CN-23-212
DOCKET No. E002/RP-24-67

PETITION

SUMMARY OF FILING

Please take notice that on September 26, 2025, Northern States Power Company filed with the Minnesota Public Utilities Commission its Petition for approval of Power Purchase Agreements (PPAs) and related service agreements for three projects: (1) Cannon Falls Energy Center (Cannon Falls) developed by Invenergy, (2) Mankato Energy Center (MEC 1) and a new Battery Energy Storage System (BESS) developed by Onward, and (3) North Star Energy developed by DESRI. Cannon Falls is a set of two, existing gas-fired combustion turbines totaling 357 megawatts (MW) in size located in Cannon Falls, Minnesota. MEC 1 is an existing 375 MW natural gas combined cycle facility located in Mankato, Minnesota.

Northern States Power Company

Docket Nos. E002/CN-23-212 & E002/RP-24-67
Petition - PPAs for Firm Dispatchable Resources
Attachment A - Cannon Falls PPA - Page 1 of 122

Execution Version

POWER PURCHASE AGREEMENT

BETWEEN

NORTHERN STATES POWER COMPANY

AND

INVENERGY CANNON FALLS LLC



- July 10, 2025 -

Northern States Power Company

Docket Nos. E002/CN-23-212 & E002/RP-24-67
Petition - PPAs for Firm Dispatchable Resources
Appendix A1 - Cannon Falls Affidavit - Page 1 of 1

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Northern States Power Company

Docket Nos. E002/CN-23-212 & E002/RP-24-67
Petition - PPAs for Firm Dispatchable Resources
Attachment B - Mankato Energy Center MEC 1 PPA - Page 1 of 131

POWER PURCHASE AGREEMENT

BETWEEN

NORTHERN STATES POWER COMPANY

AND

MANKATO ENERGY CENTER, LLC



- September 16, 2025 -

Northern States Power Company

Docket Nos. E002/CN-23-212 & E002/RP-24-67
Petition - PPAs for Firm Dispatchable Resources
Attachment C - Mankato Energy Center BESS - Page 1 of 57

AGREEMENT

BETWEEN

NORTHERN STATES POWER COMPANY

AND

MANKATO ENERGY CENTER, LLC



- September 16, 2025 -

Northern States Power Company

Docket Nos. E002/CN-23-212 & E002/RP-24-67
Petition - PPAs for Firm Dispatchable Resources
Attachment D - North Star Energy BESS PPA - Page 1 of 141

FOR EXECUTION

BATTERY STORAGE

ENERGY PURCHASE AGREEMENT

BETWEEN

NORTHERN STATES POWER COMPANY

AND

NORTH STAR ENERGY STORAGE, LLC



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Northern States Power Company

Docket Nos. E002/CN-23-212 & E002/RP-24-67
Petition - PPAs for Firm Dispatchable Resources
Attachment E - Pricing Comparison - Page 1 of 2

Comparison of Final PPA Pricing to Resource Plan Settlement Agreement

Below we provide a comparison of the final pricing terms included in the Mankato Energy Center, Cannon Falls and North Star PPAs to the pricing at the time of the Resource Plan Settlement in MPUC Docket Nos. E002/RP-24-67 and E002/CN-23-212.

Table 1: Mankato Energy Center

Price Term	Settlement	Final
Capacity Price	[PROTECTED DATA BEGINS	
Energy Tolling Price		
Turbine Start Payment		
Fired-Hours Payment		
Dispatchability Payment		
BESS		PROTECTED DATA ENDS]

Table 2: Cannon Falls

Price Term	Settlement	Final
Capacity Price	[PROTECTED DATA BEGINS	
Energy Tolling Price		

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Northern States Power Company

Docket Nos. E002/CN-23-212 & E002/RP-24-67

Petition - PPAs for Firm Dispatchable Resources

Attachment E - Pricing Comparison - Page 2 of 2

Price Term	Settlement	Final
Turbine Start Payment		
Fired-Hours Payment		
Dispatchability Payment		PROTECTED DATA ENDS]

Table 3: North Star BESS

Price Term	Settlement	Final
Capacity Price	[PROTECTED DATA BEGINS	PROTECTED DATA ENDS]

CERTIFICATE OF SERVICE

I, Joshua DePauw, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States Mail at Minneapolis, Minnesota

or

xx electronic filing

Docket Nos. E002/CN-23-212

E002/RP-24-67

Xcel Energy Miscellaneous Electric Service List

Dated this 26th day of September 2025

/s/

Joshua DePauw
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
28	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	23-212Official
29	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	23-212Official
30	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-212Official
31	Kate	Fairman	kate.fairman@state.mn.us		Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul MN, 55155-4032 United States	Electronic Service		No	23-212Official
32	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	23-212Official
33	Annie	Felix Gerth	annie.felix-gerth@state.mn.us			Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	23-212Official
34	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	23-212Official
35	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	23-212Official
36	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	23-212Official
37	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	23-212Official
38	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-212Official
39	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	23-212Official
40	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington	Electronic Service		No	23-212Official

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						MN, 55024 United States				
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42	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-212Official
43	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	23-212Official
44	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	23-212Official
45	Kari	Howe	kari.howe@state.mn.us		DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
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49	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
50	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23-212Official
51	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
52	Raymond	Kirsch	raymond.kirsch@state.mn.us		Department of Commerce	85 7th Place E Ste 500 St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
53	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
54	Brian	Kolbinger	brian@beckertownship.org	Becker Township Board		PO Box 248 12165 Hancock St Becker MN, 55308 United States	Electronic Service		No	23-212Official
55	Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers		332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States	Electronic Service		No	23-212Official
56	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	23-212Official
57	Kay	Kuhlmann	teri.swanson@ci.red-wing.mn.us	City Of Red Wing		315 West Fourth Street Red Wing MN, 55066 United States	Electronic Service		No	23-212Official
58	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	23-212Official
59	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
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63	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
64	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-212Official
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66	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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68	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
69	Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
70	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official
71	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	23-212Official
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77	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-212Official
78	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-212Official
79	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
80	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for		1919 University Ave W Ste 515	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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81	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-212Official
82	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official
83	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
84	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
85	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-212Official
86	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-212Official
87	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	23-212Official
88	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-212Official
89	Brian H.	Potts	brian.potts@huschblackwell.com	Husch Blackwell		33 E Main St Ste 300 Madison WI, 53703 United States	Electronic Service		No	23-212Official
90	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-212Official
91	Kurt	Rempe	krempe@nationalgridrenewables.com	National Grid Renewables Development, LLC		8400 Normandale Lake Blvd Suite 1200 Bloomington MN, 55437 United States	Electronic Service		No	23-212Official
92	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	23-212Official
93	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
94	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	23-212Official
95	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-212Official
96	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
97	Richard J.	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, PA		332 Minnesota St Ste W2750 St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
98	Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing		315 West 4th Street Red Wing MN, 55066 United States	Electronic Service		No	23-212Official
99	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	23-212Official
100	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-212Official
101	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	23-212Official
102	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	23-212Official
103	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-212Official
104	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-212Official
105	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-212Official
106	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-212Official
107	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
108	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
109	Sean	Stalpes	sean.stalpes@state.mn.us		Public Utilities Commission	121 E. 7th Place, Suite 350 Saint Paul MN, 55101-2147 United States	Electronic Service		No	23-212Official
110	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
111	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
112	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	23-212Official
113	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	23-212Official
114	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
115	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-212Official
116	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	23-212Official
117	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	23-212Official
118	Julianna	Wei	julianna.wei@rondo.com	Rondo Energy, Inc.		1960 North Loop Alameda CA, 94502 United States	Electronic Service		No	23-212Official
119	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
120	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	23-212Official
121	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
122	Rob	Witwer	rob.witwer@onwardenergy.com	Onward Energy Holdings, LLC		767 Third Ave 17th Floor New York NY, 10017 United States	Electronic Service		No	23-212Official
123	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	23-212Official
124	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-212Official
125	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-212Official
126	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	23-212Official
127	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
128	David	Zoppo	david.zoppo@huschblackwell.com	American Transmission Company LLC		33 East Main Street Suite 300 Madison WI, 53703 United States	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Steve	Albrecht	steve.albrecht@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
2	Jared	Alholinna	jaholinna@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
3	Keith	Anderson	keith.anderson@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
4	Shannon	Anderson	sanderson@solarunitedneighbors.org	Solar United Neighbors			Electronic Service		No	24-67
5	Beren	Argetsinger	bargetsinger@keyesfox.com			PO BOX 166 Burdett NY, 14818 United States	Electronic Service		No	24-67
6	Ray	Auginaush, Sr.	ray.auginaush@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
7	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	24-67
8	Daniel	Becchetti	dbecchetti@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
9	Todd	Beck	tbeck@grenergy.com			null null, null United States	Electronic Service		No	24-67
10	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
11	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
12	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	24-67
13	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	24-67
14	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						North Oaks MN, 55127 United States				
15	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
16	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
17	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
18	Jon	Brekke	jbrekke@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
19	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-67
20	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	24-67
21	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
22	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-67
23	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
24	Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
25	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
26	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN,	Electronic Service		Yes	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101 United States				
27	Cathy	Chavers	cchavers@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
28	Marc	Child	mchild@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
29	Michael	Childs, Jr.	michael.childsjr@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
30	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	24-67
31	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	24-67
32	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	24-67
33	Rebecca	Crooks Stratton	rebecca.crooks-stratton@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
34	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	24-67
35	Miyah	Danielson	miyahdanielson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
36	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
37	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
38	Kami	Diver	kamidiver@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
39	Becky	Dobbs	bdobbs@grenergy.com			null null, null United States	Electronic Service		No	24-67
40	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
41	Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
42	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	24-67
43	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	24-67
44	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
45	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	24-67
46	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	24-67
47	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
48	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	24-67
49	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	24-67
50	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	24-67
51	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	24-67
52	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
67	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	24-67
68	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
69	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	24-67
70	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogemo MN, 56569 United States	Electronic Service		No	24-67
71	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
72	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	24-67
73	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-67
74	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	24-67
75	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
76	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
77	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
78	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
79	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington DC, 20405 United States	Electronic Service		No	24-67
80	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
81	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)		PO Box 39 5401 W Hwy 61 Lutsen MN, 55612 United States	Electronic Service		No	24-67
82	David	Kempf	dkempf@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
83	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	24-67
84	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	24-67
85	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
86	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
87	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
88	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
89	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	24-67
90	Michelle	Larson	michelle@redwingchamber.com	Red Wing Area Chamber of Commerce		439 Main Street Red Wing, MN Bay Point Park MN, 55066 United States	Electronic Service		No	24-67
91	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	24-67
92	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
93	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
94	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-67
95	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	24-67
96	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	24-67
97	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
98	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	24-67
99	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	24-67
100	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
101	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
102	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	24-67
103	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24-67
104	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	24-67
105	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
106	Travis	Morrison	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55772 United States				
107	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
108	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	24-67
109	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	24-67
110	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	24-67
111	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
112	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
113	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
114	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
115	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	24-67
116	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
117	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-67
118	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
119	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN,	Electronic Service		Yes	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55164 United States				
120	Marsha	Parlow	mparlow@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
121	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
122	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
123	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
124	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
125	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-67
126	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
127	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-67
128	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	24-67
129	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	24-67
130	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
131	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
132	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	24-67
133	Zachary	Ruzycki	zruzycki@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
134	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	24-67
135	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
136	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-67
137	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
138	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
139	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-67
140	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-67
141	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-67
142	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
143	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
144	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-67
145	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Portage MN, 55605 United States				
146	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	24-67
147	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
148	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
149	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
150	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
151	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
152	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	24-67
153	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	24-67
154	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
155	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	24-67
156	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	24-67
157	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	24-67
158	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
159	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	24-67
160	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	24-67
161	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	24-67
162	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	24-67
163	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
164	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
165	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
166	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
167	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
168	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
169	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
170	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	24-67
171	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-67
172	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
4	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
5	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		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
6	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
7	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
8	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
9	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-	Electronic Service		No	Northern States Power Company dba Xcel

[illegible]

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
18	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
19	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
20	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
21	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
22	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
23	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
24	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
25	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Misl Electric
26	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Northern States Power Company dba Xcel

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
										Energy-ElecXcel Miscl Electric
27	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Miscl Electric
28	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Miscl Electric
29	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Miscl Electric
30	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Miscl Electric
31	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-ElecXcel Miscl Electric