

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of the Application of Xcel Energy for a Certificate of need, Site Permit, Route Permit and Pipeline Route Permit for the Lyon County Generating Station in Lyon County, Minnesota

SERVICE DATE: July 14, 2025

DOCKET NO. E-002/CN-25-145;  
G-002/GS-25-154;  
E-002/TL-25-161;  
G-002/GP-25-163

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

- 1. Accepted the applicant's certificate of need, site, route, and pipeline permit application as substantially complete with respect to the permit application completeness requirements.**
- 2. Required environmental review and hearing processes for the certificate of need and site, route, and pipeline permits jointly, including preparation of an Environmental Assessment in lieu of an environmental report.**
- 3. Did not appoint an advisory task force at this time.**
- 4. Requested a full Administrative Law Judge report with recommendations for the project's public hearing.**

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

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

BY ORDER OF THE COMMISSION



*Michael Bull*  
Mike Bull  
Acting Executive Secretary

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June 6, 2025

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

RE: EERA Comments and Recommendations on Application Completeness  
Lyon County Generating Station Project – Docket Nos. E002/CN-25-145 (Certificate of Need),  
G002/GS-25-154 (Site Permit), E002/TL-25-161 (Route Permit) & G002/GP-25-163 (Pipeline  
Permit).

Dear Mr. Seuffert,

Attached are comments and recommendations of Department of Commerce, Energy Environmental  
Review and Analysis (EERA) staff in the following matter:

In the Matter of Xcel Energy's Combined Application for a Certificate of Need, Site Permit,  
Transmission Line Route Permit, and a Pipeline Partial Exemption Route Permit for proposed  
Lyon County Generating Station Project in Lyon County in Minnesota.

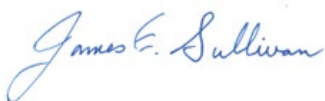
The certificate of need and route permit application was filed on May 9, 2025, by:

Ian M. Dobson  
Lead Assistant General Counsel  
Xcel Energy  
414 Nicollet Mall, 401 – 8th Floor  
Minneapolis, MN 55401

Christine Schwartz  
Regulatory Administrator  
Xcel Energy  
414 Nicollet Mall, 401 – 7th Floor  
Minneapolis, MN 55401

EERA staff recommends that the Site, Route, and Pipeline permit portions of the application be  
accepted as complete. EERA staff is available to answer any questions the Commission may have.

Sincerely,



James E. Sullivan  
Environmental Review Manager

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# BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

## ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS COMMENTS AND RECOMMENDATIONS

### LYON COUNTY GENERATING STATION PROJECT

DOCKET NOS. E002/CN-25-145 (CERTIFICATE OF NEED), E002/GS-25-154 (SITE PERMIT), E002/TL-25-161 (ROUTE PERMIT) AND E002/GP-25-163 (PIPELINE PERMIT)

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**Date:** June 6, 2025

**EERA Staff:** James E. Sullivan | 651.539.1059 | [jim.sullivan@state.mn.us](mailto:jim.sullivan@state.mn.us)

**In the Matter of Xcel Energy’s Combined Application for a Certificate of Need, Site Permit, Transmission Line Route Permit, and a Pipeline Partial Exemption Route Permit for proposed Lyon County Generating Station Project in Lyon County in Minnesota.**

**Issues Addressed:** These comments and recommendations address the completeness of the combined application for a certificate of need, site permit, transmission line route permit, pipeline routing permit, and partial exemption (application), the advisability of conducting the environmental review and hearing processes for the certificate of need and combined site, route, and pipeline permit jointly, the need for an advisory task force, and the presence of contested issues of fact.

**Documents Attached:**

(1) Project Map

Additional documents and information can be found on eDockets: <https://www.edockets.state.mn.us> (CN-25-145; GS-25-154; TL-25-161; GP-25-163) and on the Department of Commerce’s website: <http://mn.gov/commerce/energyfacilities>.

This document can be made available in alternative formats (i.e., large print or audio) by calling 651-296-1530 (voice).

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## Introduction and Background

On May 9, 2025, Northern States Power Company, a Minnesota corporation doing business as Xcel Energy (the applicant), submitted a combined application to the Minnesota Public Utilities Commission (Commission) for the proposed Lyon County Generating Station Project.<sup>1</sup> The application requests a Certificate of Need, Site Permit, Transmission Line Route Permit, and Pipeline Routing Permit for the proposed project.

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<sup>1</sup> Combined Certificate of Need and Route Permit Application for the Lyon County Generating Station Project, Xcel Energy, May 9, 2025, eDocket numbers [20255-218749-01](#) (through –13), [20255-218749-15](#) (through –16) [hereinafter Application].

On May 13, 2025, the Commission issued a notice soliciting comments on the completeness of the application, the advisability of conducting the environmental review and hearing processes for the certificate of need and route permit jointly, the need for an advisory task force, the presence of contested issues of fact, and other related matters.<sup>2</sup>

### ***Project Purpose***

The applicant maintains that the proposed generation project provides a blend of reliability, environmental responsibility, and cost-effective power generation. The project employs combustion turbines (CTs), which will supply firm, dispatchable energy critical during peak demand periods and times of low renewable output. The applicant is using turbines that can start quickly and help stabilize the grid as needed, supporting recommendations from the North American Electric Reliability Corporation (NERC), which emphasized the need for dependable, gas-fired resources and better integration between gas and electric systems, especially during extreme weather events.

The project also enhances transmission system stability for the Minnesota-North Dakota Electric Cooperative (MNEC) through synchronous condenser capabilities. This stability eliminates the need for two standalone condenser units at the Garvin Substation, reducing both costs and infrastructure demands.

Environmentally, the project is designed with a small 30-acre footprint and is co-located with existing Xcel Energy infrastructure and a nearby gas pipeline, minimizing land use and avoiding impacts to sensitive resources. The applicants acknowledge that carbon emissions will occur; however, the plant is expected to operate at a low-capacity factor and has the potential to co-combust hydrogen. Additionally, Xcel Energy is required to conduct a carbon-free feasibility study after the facility becomes operational. This study will explore options for converting the plant to zero emissions, potentially through full hydrogen use, by 2040.

The project will also connect using Xcel Energy's existing interconnection rights at the Sherco Substation, bypassing the Midcontinent Independent System Operator (MISO) interconnection queue and allowing for faster deployment.

The applicant asserts that CTs offer advantages over other firm generation technologies due to their lower capital costs, simple design, and operational efficiency. Emergency generators are included in the project to ensure continued operation during outages, bolstering overall system reliability. Xcel Energy maintains that this project supports their shift from coal to a more sustainable and resilient energy system while enabling further integration of renewable resources.

### ***Project Description***

The Project consists of three main components:

1. **Generation Project:** Two combustion turbines (CTs), each with a capacity of approximately 210 megawatts (MW), along with associated facilities such as operational buildings, emergency diesel systems, and support infrastructure.
2. **Transmission Lines:** Two short 345 kV transmission line connections (combined length approximately 4,300 feet) that will link the turbines to the grid. Xcel Energy seeks permitting for both the Generation Project and the Transmission Lines through the Commission's alternative review process.

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<sup>2</sup> Notice of Comment Period on Application Completeness, May 13, 2025. eDocket number [20255-218860-01](#).

3. **Pipeline:** A 965-foot natural gas pipeline comprising 700 feet of 12-inch diameter pipe and two 8-inch diameter branches, each serving one turbine. The pipeline, which will operate at approximately 550 psig, will connect to the existing Northern Border Pipeline. Due to its limited scope and impact, Xcel is seeking approval under the Commission's partial exemption rules for pipelines.

The entire Project will be located on two parcels owned by Xcel Energy in Lyon County, adjacent to the proposed Garvin Substation (see Project Map). It will interconnect with the grid via the Minnesota Energy Connection Project (MNEC), a 345-kV transmission line between the Sherco Substation in Becker, MN, and the Garvin Substation. The Project site covers approximately 155 acres, with permanent impacts limited to about 30 acres.

## Regulatory Process and Procedures

In Minnesota, no person may construct a large electric power generating plant without obtaining a site permit from the Commission.<sup>3</sup> A large electric power generating plant is plant with a capacity greater than greater than 50 megawatts (MW).<sup>4</sup> Additionally, no person may construct a high voltage transmission line without obtaining a route permit from the Public Utilities Commission.<sup>5</sup> A high voltage transmission line is defined as an electric conductor designed for and capable of operating at 100 kilovolts (kV) or more and extending more than 1,500 feet in length.<sup>6</sup> The Commission has jurisdiction over the routing of pipelines that have a nominal diameter of six inches or more, and are designed to transport hazardous liquids, or are designed to transport natural gas at pressures greater than 275 pounds per square inch (psig).<sup>7</sup>

The proposed project will have a capacity of more than 50 MW and utilize high voltage transmission lines to connect to the electrical grid; thus, the project requires a site permit and a route permit. Additionally, because the project will transport natural gas at a pressure greater than 275 psig, the project will require a pipeline routing permit<sup>8</sup>

Because the project qualifies as a large energy facility, it also requires a certificate of need (CN).<sup>9</sup> The CN must be considered using the processes prescribed by Minnesota Statute 216B.243 and Minnesota Rules 7849. The applicants requested exemptions from certain content requirements for a CN application pursuant to Minn. R. 7849.0200, subp. 6.<sup>10</sup> The Commission approved the applicant's request for exemptions.<sup>11</sup>

The applicant maintains that the project is eligible to use the alternative review process prescribed by Minnesota Statute 216E.04.<sup>12</sup> They have indicated their intent to use the alternative review process through their May 9, 2025, Commission notice.<sup>13</sup>

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<sup>3</sup> Minnesota Statute 216E.03.

<sup>4</sup> Minnesota Statute 216E.01, Subp. 5.

<sup>5</sup> Minnesota Statute 216E.03.

<sup>6</sup> Minnesota Statute 216E.01.

<sup>7</sup> Minnesota Statute 216G.02.

<sup>8</sup> Ibid.

<sup>9</sup> Minnesota Statutes 216B.2421 and 216B.243.

<sup>10</sup> March 14, 2025, Applicant's CN exemption request. eDocket number. [20253-216416-01](#)

<sup>11</sup> May 8, 2025, Commission order. eDocket number. [20255-218960-01](#)

<sup>12</sup> Minnesota Statute 216E.04, Subd. 2(3) provides this alternative for high voltage transmission lines of between 100 and 200 kilovolts.

<sup>13</sup> Applicant's May 9, 2025, correspondence. eDocket number. [20255-218749-01](#)

### ***Application Acceptance***

Applications for site permits and for high voltage transmission line route permits must provide specific information about a project including applicant information, site and route descriptions, and potential environmental impacts and mitigation measures.<sup>14</sup> Under the alternative review process, applicants must propose one site/route in their permit application and discuss any other sites/routes considered and rejected for the project.<sup>15</sup>

The applicant maintains that the natural gas pipeline associated with its project will have minimal impacts to people and the environment and requests use of the partial exemption process for permitting of the pipeline.<sup>16</sup> Applications under the partial exemption process must provide information about the pipeline, land requirements, right-of-way preparation, and potential environmental impacts.<sup>17</sup>

The Commission may accept an application as complete, reject an application and require additional information to be submitted, or accept an application as complete upon filing of supplemental information.<sup>18</sup> The environmental review and permitting process begins on the date the Commission determines that the combined site, route, and pipeline permit application is complete.<sup>19</sup> The Commission has six months (or nine months, with just cause) from the date of this determination to reach a route permit decision.<sup>20</sup>

### ***Environmental Review***

Site and route permit applications are subject to environmental review conducted by Department of Commerce, Energy Environmental Review and Analysis (EERA) staff.<sup>21</sup> Projects proceeding under the alternative review process require the preparation of an environmental assessment (EA).<sup>22</sup> An EA is a document that describes the potential human and environmental impacts of a proposed project and possible mitigation measures. Public meetings will be held to solicit comments on the scope of the EA.<sup>23</sup>

### ***Certificate of Need and Joint Environmental Review***

As noted above, the project requires a certificate of need from the Commission; the applicants have applied to the Commission for this approval. Certificate of need applications are subject to environmental review conducted by EERA staff, including preparation of an environmental report for these projects.<sup>24</sup>

If a certificate of need and a site/route permit are required for the same project, EERA staff may elect to combine the two environmental review processes and prepare an EA in lieu of an environmental report.<sup>25</sup> If an EA is prepared in lieu of an environmental report, the EA must include an analysis of alternatives to the project that would otherwise be required in an environmental report.<sup>26</sup>

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<sup>14</sup> Minnesota Rule 7850.3100.

<sup>15</sup> Ibid.

<sup>16</sup> See Minn. R. 7852.0600 and .0700

<sup>17</sup> Minnesota Rule 7852.2100 through 7852.3000.

<sup>18</sup> Minnesota Rule 7850.3200.

<sup>19</sup> Ibid.

<sup>20</sup> Minnesota Rule 7850.3900.

<sup>21</sup> Minnesota Statute 216E.04, Subd. 5.

<sup>22</sup> Ibid.

<sup>23</sup> Minnesota Rule 7850.2500.

<sup>24</sup> Minnesota Rule 7849.1200.

<sup>25</sup> Minnesota Rule 7849.1900.

<sup>26</sup> Ibid.

### ***Public Hearing***

Site and route permit applications under the alternative review process require that a public hearing be held in the project area after the EA for the project has been completed and released.<sup>27</sup> The hearing is typically presided over by an administrative law judge (ALJ) from the Office of Administrative Hearings. If certificate of need and site/route permitting processes are proceeding concurrently, the Commission may order that a joint hearing be held to consider both need and permitting.<sup>28</sup>

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

### ***Advisory Task Force***

The Commission may appoint an advisory task force to aid the environmental review process.<sup>29</sup> An advisory task force must include representatives of local governmental units in the project area.<sup>30</sup> A task force assists EERA staff with identifying impacts and mitigation measures to be evaluated in the EA. A task force expires upon issuance of the EA scoping decision.<sup>31</sup>

The Commission is not required to appoint an advisory task force for every project. If the Commission does not appoint a task force, citizens may request that one be appointed.<sup>32</sup> If such a request is made, the Commission must determine at a subsequent meeting if a task force should be appointed or not. The decision whether to appoint an advisory task force does not need to be made at the time of application acceptance; however, it should be made as soon as practicable to ensure its charge can be completed prior to issuance of the EA scoping decision.

## **EERA Staff Analysis and Comments**

EERA staff provides the following analysis and comments in response to the Commission's notice requesting comments on completeness and other issues related to the applicant's certificate of need and combined site, route, and pipeline permit application.

### ***Application Completeness***

EERA staff has conferred with the applicant regarding the proposed project and has reviewed a draft application. EERA staff believes that staff comments on the draft application have been addressed in the application submitted to the Commission. Staff has evaluated those portions of the application related to the project siting, transmission line and pipeline routing, against the application completeness requirements (Tables 1 through 3). Staff finds that the application contains appropriate and complete information with respect to these requirements. Staff did not review the application for its compliance with certificate of need completeness requirements. EERA staff has no opinion on these requirements.

### ***Joint Environmental Review***

The Commission has before it a combined certificate of need, site, route, and pipeline permit application for the Project. It appears to EERA staff that the need and permitting processes for the Project will proceed

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<sup>27</sup> Minnesota Rule 7850.3800.

<sup>28</sup> Minnesota Statute 216B.243, Subd. 4.

<sup>29</sup> Minnesota Statute 216E.08.

<sup>30</sup> Ibid.

<sup>31</sup> Minnesota Rule 7850.3600.

<sup>32</sup> Ibid.

concurrently, including the pipeline partial exemption. Thus, at this time, EERA staff anticipates that it will prepare one Environmental Assessment (EA) document for the Project.

EERA staff believes that preparation of an EA in lieu of an environmental report for the certificate of need will not lengthen the certificate of need or route permitting processes. Additionally, the applicants have requested that the certificate of need, siting, transmission line route, and pipeline permitting processes be conducted jointly.<sup>33</sup> Finally, EERA believes that joint environmental review is relatively more efficient for the public, local governments, agencies, and tribes, and that there are benefits to having an environmental analysis of need and routing in one document.

### ***Joint Public Hearings***

As noted above, EERA believes that joint environmental review is appropriate for the Project. Thus, public information and scoping meetings would also be joint and directed toward developing the scope of an EA that would address both the certificate of need and site, route, and pipeline permits.

The applicants have also proposed joint hearings to address both project need and site/route permitting.<sup>34</sup> Per Minnesota Statute 216B. 2343, joint hearings should be held unless they are not feasible or efficient or otherwise not in the public interest.<sup>35</sup> EERA staff believes that joint hearings are feasible, efficient and in the public interest.

### ***Advisory Task Force***

When analyzing the necessity for a project advisory task force, EERA staff deliberated on four key characteristics: project size, project complexity, known or anticipated controversy, and sensitive resources. Staff concludes that a task force is not warranted for the project at this time.

- **Project Size.** The Project area is approximately 155 acres in size, with approximately 30 acres operating as the developed project footprint. Permanent impacts are expected because of the two 210 MW natural gas combustion turbines, two 345 kV transmission lines (approximately 4,300 feet), and a 12-inch pipeline with two 8-inch branches (965 feet in total). All property is owned by the applicant.

Through EERA experience, an advisory task force is best suited for specific, defined geographies and impacts. In this situation, EERA staff believe existing public participation and engagement practices provide adequate opportunity to identify potential project impacts. The project site, including the natural gas combustion turbines and related infrastructure, transmission line and pipeline are confined to the approximately 30 acre developed footprint on property owned by the applicant, located in Custer Township, Lyon County. An advisory task force in this situation would likely perform no different than the existing public participation practices (i.e., public scoping comments, public meetings, and public hearings).

- **Project Complexity.** Land use within the Project area is agricultural, characterized by cultivated crop fields, and related agricultural production, rural homesteads, and existing electrical infrastructure.<sup>36</sup> Given the project size and short, linear nature of the proposed line, project complexity factors do not support a task force.

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<sup>33</sup> Application, p. 2-2.

<sup>34</sup> Ibid.

<sup>35</sup> Minnesota Statute 216B.243, Subd. 4.

<sup>36</sup> Application, p. 8-1.

Both transmission line and pipeline routes are relatively short and are within the boundaries of property owned by the applicant. Given the proposed transmission line and pipeline route lengths and alternative routes considered and rejected, the applicant has considered and documented their initial evaluation of potential impacts to human and environmental resources in their application. An advisory task force would not add additional value to the project as there is little potential for project complexity.

**Known or Anticipated Controversy.** To date, EERA has not received any comments regarding potential project impacts. The applicant held public outreach events in the area and did not report any public concerns during their public engagement process. They did encounter questions pertaining to water usage, noise, and impacts to local ditches and drain tile in the area, as well as the regulatory process and construction timeline.<sup>37</sup> Given the relatively short transmission and pipeline route length and existing land use and right of way, this factor does not weigh in favor of a task force.

- **Sensitive Natural Resources.** The applicant reviewed federal and state data bases for the existence of rare and unique natural resources within the project area. Three federally listed species have the potential to occur in the project area, including the Northern long-eared bat, the Tricolored bat, and the Monarch butterfly.<sup>38</sup> Additionally, 16 bird species protected under the Migratory Bird Treaty Act (MBTA) may occur within or adjacent to the project area.<sup>39</sup> Additionally, the applicants conducted a review of the National Heritage Information System for potential effects to rare features.<sup>40</sup> Given the relatively short line length, route siting and construction practices, this factor does not support the use of a project task force.

As there are no trees within the Project Study Area and no known bat hibernacula on or near the site, impacts to bats are not anticipated. Similarly, the Project Study Area consists primarily of vegetation associated with agricultural production and lacks suitable habitat for Monarch butterflies; therefore, no impacts to this species are expected. Avian species protected under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act are also unlikely to be impacted, as the area lacks trees and other habitat features typically required by these species. Most of these protected birds are associated with undeveloped landscapes such as wetlands, lakes, shorelines, or forested areas, which are absent from the site. Additionally, a review by the Natural Heritage Information System (NHIS) confirmed that the Project will not affect any known occurrences of rare species or features, and no further evaluation is necessary.<sup>41</sup>

In summary, EERA believes an advisory task force is unnecessary for addressing potential impacts and mitigation measures associated with the project.

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<sup>37</sup> Application, p. 94.

<sup>38</sup> Application, p. 90.

<sup>39</sup> Application, pp. 90-91.

<sup>40</sup> Application, p. 91.

<sup>41</sup> Application. P. 91.

### ***Contested Issues of Fact***

Based on its review of the combined certificate of need, route, site, and pipeline permit application and the record to date, EERA staff has not identified any contested issues of fact. Staff is unaware of any issues or concerns associated with the application or project that require a contested case hearing.

EERA staff recommends that the Commission request a full ALJ report for the project's public hearing. EERA staff believes that a full ALJ report with recommendations provides an unbiased, efficient, and transparent method to air and resolve any issues that may emerge as the record is developed. Requiring a full ALJ report reduces the burden on Commission staff and helps to ensure that the Commission has a robust record on which to base its decision. Additionally, a full ALJ report does not significantly lengthen the route permitting process. EERA staff has provided a draft schedule for the environmental review and permitting process, which includes a comparison of potential hearing work products and schedules (i.e., a summary of public testimony vs. a full ALJ report with findings, conclusions, and recommendations) (see Table 2).

### **EERA Staff Recommendations**

EERA staff recommends that the Commission:

- Accept the applicant's certificate of need, site, route, and pipeline permit application as substantially complete with respect to the permit application completeness requirements.
- Conduct the environmental review and hearing processes for the certificate of need and site, route, and pipeline permits jointly, including preparation of an EA in lieu of an environmental report.
- Not appoint an advisory task force at this time.
- Request a full ALJ report with recommendations for the project's public hearing.

**Application Completeness Requirements  
Lyon County Generating Station  
Table 1. Site Permit Application Completeness Checklist**

Authority	Site Permit Application Required Information	Location in Application
<b>Minn. R. 7850.2800, Eligible Projects</b>		
Subp. 2	An applicant for a permit for one of the qualifying projects in Minn. R. 7850.2800, subpart 1, who intends to follow the alternative permitting process procedures of parts 7850.2800 to 7850.3700, shall notify the PUC of such intent, in writing, at least ten days before submitting an application for the project. <i><b>EERA Staff Comments:</b></i> The applicant has provided timely notice and demonstrated their qualification for the alternative permitting process.	Section 1.1 and Appendix B
<b>Minn. R. 7850.1900, Subpart 1, Site Permit For Large Electric Power Generating Plant</b>		
A.	A statement of proposed ownership of the facility as of the day of filing and after commercial operation. <i><b>EERA Staff Comments:</b></i> Information is provided to satisfy this requirement.	Section 1.2
B.	The precise name of any person or organization to be initially named as permittee or permittees and the name of any other person to whom the permit may be transferred if transfer of the permit is contemplated. <i><b>EERA Staff Comments:</b></i> Information is provided to satisfy this requirement.	Section 2.1
C.	At least two proposed sites for the proposed large electric power generating plant and identification of the applicant's preferred site and the reasons for preferring the site. <i><b>EERA Staff Comments:</b></i> Information is provided to satisfy this requirement.	Section 3.1.8
D.	A description of the proposed large electric power generating plant and all associated facilities, including the size and type of the facility. <i><b>EERA Staff Comments:</b></i> Information is provided to satisfy this requirement.	Section 3.1.1
E.	The environmental information required under Subpart 3. <i><b>EERA Staff Comments:</b></i> Information is provided to satisfy this requirement.	Section 7.0
F.	The names of the owners of the property for the proposed site. <i><b>EERA Staff Comments:</b></i> Information is provided to satisfy this requirement.	Section 1.2
G.	The engineering and operational design for the large electric power generating plant. <i><b>EERA Staff Comments:</b></i> Information is provided to satisfy this requirement.	Section 3.1
H.	A cost analysis of the large electric power generating plant, including the cost of constructing and operating the facility that is dependent on design and site. <i><b>EERA Staff Comments:</b></i> Information is provided to satisfy this requirement.	Sections 2.4, 6.2.1, and 6.4.1

Authority	Site Permit Application Required Information	Location in Application
<b>Minn. R. 7850.1900, Subpart 1, Site Permit For Large Electric Power Generating Plant (Cont.)</b>		
I.	An engineering analysis of the site, including how the site could accommodate expansion of generating capacity in the future. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Sections 3.1 and 4.4
J.	Identification of transportation, pipeline, and electrical transmission systems that will be required to construct, maintain, and operate the facility. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Sections 6.2 and 6.4
K.	A listing and brief description of federal, state, and local permits that may be required for the project. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Table 9-1, Section 9.0
L.	A copy of the Certificate of Need for the project from the Public Utilities Commission or documentation that an application for a Certificate of Need has been submitted or is not required. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 1.8
<b>Minn. R. 7850.1900, Subpart 3, Environmental Information</b>		
A.	A description of the environmental setting for the site. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.0
B.	A description of the effects of construction and operation of the facility on human settlement, including, but not limited to, public health and safety, displacement, noise, aesthetics, socioeconomic impacts, cultural values, recreation, and public services. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.1
C.	A description of the effects of the facility on land-based economies, including, but not limited to, agriculture, forestry, tourism, and mining. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.2
D.	A description of the effects of the facility on archaeological and historic resources. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.3
E.	A description of the effects of the facility on the natural environment, including effects on air and water quality resources and flora and fauna. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.4
F.	A description of the effects of the facility on rare and unique natural resources. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.5
G.	Identification of human and natural environmental effects that cannot be avoided if the facility is approved at a specific site or route. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.6
H.	A description of measures that might be implemented to mitigate the potential human and environmental impacts identified in items A to G and the estimated costs of such mitigation measures. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Sections 7.1 and Section 7.5

**Lyon County Generating Station**  
**Table 2. Route Permit Application Completeness Checklist**

Authority	Route Permit Application Required Information	Location in Application
<b>Minn. R. 7850.2800, Eligible Projects</b>		
Subp. 2	An applicant for a permit for one of the qualifying projects in Minn. R. 7850.2800, subpart 1, who intends to follow the alternative permitting process procedures of parts 7850.2800 to 7850.3700, shall notify the PUC of such intent, in writing, at least ten days before submitting an application for the project. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 1.1 and Appendix B
<b>Minn. R. 7850.1900, Subpart 2, Route Permit for HVTL</b>		
A.	A statement of proposed ownership of the facility at the time of filing the application and after commercial operation. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 1.2
B.	The precise name of any person or organization to be initially named as permittee or permittees and the name of any other person to whom the permit may be transferred if transfer of the permit is contemplated. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 2.1
C.	At least two proposed routes for the proposed HVTL and identification of the applicant's preferred route and the reasons for the preference. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 3.2.4
D.	A description of the proposed HVTL and all associated facilities including the size and type of the HVTL. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 3.2
E.	The environmental information required under subpart 3. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.0
F.	Identification of land uses and environmental conditions along the proposed routes. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.1.9
G.	The names of each owner whose property is within any of the proposed routes for the HVTL. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 1.2
H.	United States Geological Survey topographical maps or other maps acceptable to the Commission showing the entire length of the HVTL on all proposed routes. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Appendix C
I.	Identification of existing utility and public rights-of-way along or parallel to the proposed routes that have the potential to share the right-of-way with the proposed line. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 3.2.2
J.	The engineering and operational design concepts for the proposed high voltage transmission line, including information on the electric and magnetic fields of the transmission line. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Sections 3.2.3, 6.4.2, and 7.1.12
K.	Cost analysis of each route, including the costs of constructing, operating, and maintaining the HVTL that are dependent on design and route. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Sections 2.4 and 6.4.2

L.	A description of possible design options to accommodate expansion of the HVTL in the future. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 4.4
M.	The procedures and practices proposed for the acquisition and restoration of the right-of-way, construction, and maintenance of the HVTL. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Sections 3.2, 6.2.2, and 6.4.2
N.	A listing and brief description of federal, state, and local permits that may be required for the proposed HVTL. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Table 9-1, Section 9.0
O.	A copy of the Certificate of Need (CN) or the certified HVTL list containing the proposed HVTL or documentation that an application for a CN has been submitted or is not required. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 1.8
<b>Minn. R. 7850.1900, Subpart 3, Environmental Information</b>		
A.	A description of the environmental setting for the site. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.0
B.	A description of the effects of construction and operation of the facility on human settlement, including, but not limited to, public health and safety, displacement, noise, aesthetics, socioeconomic impacts, cultural values, recreation, and public services. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.1
C.	A description of the effects of the facility on land-based economies, including, but not limited to, agriculture, forestry, tourism, and mining. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.2
D.	A description of the effects of the facility on archaeological and historic resources. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.3
E.	A description of the effects of the facility on the natural environment, including effects on air and water quality resources and flora and fauna. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.4
F.	A description of the effects of the facility on rare and unique natural resources. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.5
G.	Identification of human and natural environmental effects that cannot be avoided if the facility is approved at a specific site or route. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 7.6
H.	A description of measures that might be implemented to mitigate the potential human and environmental impacts identified in items A to G and the estimated costs of such mitigation measures. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Sections 7.1 through 7.5

**Lyon County Generating Station**

**Table 3. Pipeline Routing Permit & Partial Exemption Application Completeness Checklist**

Authority	Pipeline Routing Permit & Partial Exemption Application Required Information	Location in Application
<b>EERA Staff Comments:</b>		
Subp. 1	<p><b>Cover letter.</b> Each application must be accompanied by a cover letter signed by an authorized representative or agent of the applicant. The cover letter must specify the type, size, and general characteristics of the pipeline for which an application is submitted.</p> <p><b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.</p>	Cover Letter; Cover Page
Subp. 2	<p><b>Title page and table of contents.</b> Each application must contain a title page and a complete table of contents.</p> <p><b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.</p>	Table of Contents
Subp. 3	<p><b>Statement of ownership.</b> Each application must include a statement of proposed ownership of the pipeline as of the day of filing and an affidavit authorizing the applicant to act on behalf of those planning to participate in the pipeline project.</p> <p><b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.</p>	Section 1.2
Subp. 4	<p><b>Background information.</b> Each application must contain the following information:</p> <p>A. the applicant's complete name, address, and telephone number;</p> <p><b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.</p>	Section 2.1
	<p>B. the complete name, title, address, and telephone number of the authorized representative or agent to be contacted concerning the applicant's filing;</p> <p><b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.</p>	Section 2.1
	<p>C. the signatures and titles of persons authorized to sign the application, and the signature of the preparer of the application if prepared by an outside representative or agent; and</p> <p><b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.</p>	Cover Letter; Cover Page
	<p>D. a brief description of the proposed project which includes:</p> <ol style="list-style-type: none"> <li>(1) general location;</li> <li>(2) planned use and purpose;</li> <li>(3) estimated cost;</li> <li>(4) planned in-service date; and general design and operational specifications for the type of pipeline for which an application is submitted.</li> </ol> <p><b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.</p>	Sections 1.1, 1.2, 1.3, 2.1, 2.3, and 2.4

**Minn. R. 7852.2200, Proposed Pipeline and Associated Facilities Description**

Subp. 1	<p><b>Pipeline design specifications.</b> The specifications for pipeline design and construction are assumed to be in compliance with all applicable state and federal rules or regulations unless determined otherwise by the state or federal agency having jurisdiction over the enforcement of such rules or regulations. For public information purposes, the anticipated pipeline design specifications must include but are not limited to:</p> <p>A. pipe size (outside diameter) in inches;  <i>EERA Staff Comments:</i> Information is provided to satisfy this requirement.</p>	Section 3.3.2
	<p>B. pipe type;  <i>EERA Staff Comments:</i> Information is provided to satisfy this requirement.</p>	Section 3.3.2
	<p>C. nominal wall thickness in inches;  <i>EERA Staff Comments:</i> Information is provided to satisfy this requirement.</p>	Section 3.3.2
	<p>D. pipe design factor;  <i>EERA Staff Comments:</i> Information is provided to satisfy this requirement.</p>	Section 3.3.2
	<p>E. longitudinal or seam joint factor;  <i>EERA Staff Comments:</i> Information is provided to satisfy this requirement.</p>	Section 3.3.2
	<p>F. class location and requirements, where applicable;  <i>EERA Staff Comments:</i> Information is provided to satisfy this requirement.</p>	Section 3.3.2
	<p>G. specified minimum yield strength in pounds per square inch; and  <i>EERA Staff Comments:</i> Information is provided to satisfy this requirement.</p>	Section 3.3.2
	<p>H. tensile strength in pounds per square inch.  <i>EERA Staff Comments:</i> Information is provided to satisfy this requirement.</p>	Section 3.3.2
Subp. 2	<p><b>Operating pressure.</b> Operating pressure must include:</p> <p>A. operating pressure (psig); and  <i>EERA Staff Comments:</i> Information is provided to satisfy this requirement.</p>	Section 3.3.2
	<p>B. maximum allowable operating pressure (psig).  <i>EERA Staff Comments:</i> Information is provided to satisfy this requirement.</p>	Section 3.3.2
Subp. 3	<p><b>Description of associated facilities.</b> For public information purposes, the applicant shall provide a general description of all pertinent associated facilities on the right- of-way.  <i>EERA Staff Comments:</i> Information is provided to satisfy this requirement.</p>	Section 3.3.3
Subp. 4	<p><b>Product capacity information.</b> The applicant shall provide information on planned minimum and maximum design capacity or throughput in the appropriate unit of measure for the types of products shipped as defined in part 7852.0100.  <i>EERA Staff Comments:</i> Information is provided to satisfy this requirement.</p>	Section 3.3.4
Subp. 5	<p><b>Product description.</b> The applicant shall provide a complete listing of products the pipeline is intended to ship and a list of products the pipeline is designed to transport, if different from those intended for shipping.  <i>EERA Staff Comments:</i> Information is provided to satisfy this requirement.</p>	Section 3.3.4
Subp. 6	<p><b>Material safety data sheet.</b> For each type of product that will be shipped through the pipeline, the applicant shall provide for public information purposes the material identification, ingredients, physical data, fire and explosive data, reactivity data, occupational exposure limits, health information, emergency and first aid procedures, transportation requirements, and other known regulatory controls.  <i>EERA Staff Comments:</i> Information is provided to satisfy this requirement.</p>	Appendix E

Minn. R. 7852.2300, Land Requirements		
	For the proposed pipeline, the applicant shall provide the following information: A. permanent right-of-way length, average width, and estimated acreage; <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 3.3.1
	B. temporary right-of-way (workspace) length, estimated width, and estimated acreage; <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 3.3.1
	C. estimated range of minimum trench or ditch dimensions including bottom width, top width, depth, and cubic yards of dirt excavated; <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 3.3.1
	D. minimum depth of cover for state and federal requirements; and <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 3.3.1
	E. rights-of-way sharing or paralleling: type of facility in the right-of-way, and the estimated length, width, and acreage of the right-of-way. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 3.3.1
Minn. R. 7852.2400, Project Expansion		
	If the pipeline and associated facilities are designed for expansion in the future, the applicant shall provide a description of how the proposed pipeline and associated facilities may be expanded by looping, by additional compressor and pump stations, or by other available methods. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 4.4
Minn. R. 7852.2500, Right-of-Way Preparation Procedures and Construction Activity Sequence		
	Each applicant shall provide a description of the general right-of-way preparation procedures and construction activity sequence anticipated for the proposed pipeline and associated facilities. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Sections 6.2.2.2 and 6.2.3
Minn. R. 7852.2600, Preferred Route Location, Environment Description		
Subp. 1	<b>Preferred route location.</b> The applicant must identify the preferred route for the proposed pipeline and associated facilities, on any of the following documents which must be submitted with the application: A. United States Geological Survey topographical maps to the scale of 1:24,000, if available; <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	-
	B. Minnesota Department of Transportation county highway maps; or <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	-
	C. aerial photos or other appropriate maps of equal or greater detail in items A and B. The maps or photos may be reduced for inclusion in the application. One full-sized set shall be provided to the commission. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Figure 1-2, Appendix C
Subp. 2	<b>Other route locations.</b> All other route alternatives considered by the applicant must be identified on a separate map or aerial photos or set of maps and photos or identified in correspondence or other documents evidencing consideration of the route by the applicant. <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.	Section 3.2.4

Subp. 3	<p><b>Description of environment.</b> The applicant must provide a description of the existing environment along the preferred route.  <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.</p>	Section 7.0
<b>Minn. R. 7852.2700, Environmental Impact of Preferred Route</b>		
<p>The applicant must also submit to the commission along with the application an analysis of the potential human and environmental impacts that may be expected from pipeline right-of-way preparation and construction practices and operation and maintenance procedures. These impacts include but are not limited to the impacts for which criteria are specified in part 7852.0700 or 7852.1900.  <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.</p>		Sections 3.3, 6.2.3, and 7.0
<b>Minn. R. 7852.2800, Right-of-Way Protection and Restoration Measures</b>		
Subp. 1	<p><b>Protection.</b> The applicant must describe what measures will be taken to protect the right-of-way or mitigate the adverse impacts of right-of-way preparation, pipeline construction, and operation and maintenance on the human and natural environment.  <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.</p>	Sections 6.2.3, 6.3, and 7.1 through 7.5
Subp. 2	<p><b>Restoration.</b> The applicant must describe what measures will be taken to restore the right-of-way and other areas adversely affected by construction of the pipeline.  <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.</p>	Section 6.3
<b>Minn. R. 7852.2900, Operation and Maintenance</b>		
<p>Pipeline operations and maintenance are assumed to be in compliance with all applicable state and federal rules or regulations, unless determined otherwise by the state or federal agency having jurisdiction over the enforcement of such rules or regulations. For public information purposes, the applicant must provide a general description of the anticipated operation and maintenance practices planned for the proposed pipeline.  <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.</p>		Section 6.4.3
<b>Minn. R. 7852.3000, List of Government Agencies and Permits</b>		
<p>Each application must contain a list of all the known federal, state, and local agencies or authorities and titles of the permits they issue that are required for the proposed pipeline and associated facilities.  <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.</p>		Table 9-1, Section 9.0
<b>Minn. R. 7852.3100, Evidence of Consideration of Alternative Routes</b>		
<p>If the applicant is applying for a pipeline routing permit under parts 7852.0800 to 7852.1900, the applicant shall provide a summary discussion of the environmental impact of pipeline construction along the alternative routes consistent with the requirements of parts 7852.2600 to 7852.2700 and the rationale for rejection of the routing alternatives.  <b>EERA Staff Comments:</b> Information is provided to satisfy this requirement.</p>		Not applicable if applicant is granted a partial exemption from the pipeline route selection procedures under Minn. R. 7852.0600.

**Table 4. Draft Permitting Process Schedule**

Approximate Date	Permitting Day	Permitting Process Step
	--	Application Submitted
	--	Comment Period on Application Completeness
	--	Commission Considers Application Acceptance
	0	Application Acceptance Order
	5	Notice of Public Information and Scoping Meetings
	30	Public Information and Scoping Meetings
	60	Scoping Decision Issued
	210	EA Issued   Notice of EA Availability and Public Hearing
	240	Public Hearing
	270	Public Hearing Comment Period Closes
	270	Applicant Responses to Hearing Comments
<b>Summary of Public Testimony</b>		
	280	Applicant Proposed Findings
	290	EERA Responses to Comments on EA; Technical Analysis; Replies to Applicant Proposed Findings
	290	ALJ Submits Summary of Public Testimony
	320	Commission Staff Prepares Findings and Proposed Route Permit
	340	Commission Considers CN and Route Permit Issuance
<b>Full ALJ Report with Findings, Conclusions, and Recommendations</b>		
	280	Applicant Proposed Findings
	290	EERA Responses to Comments on EA; Technical Analysis; Replies to Applicant Proposed Findings
	320	ALJ Submits Full Report
	335	Exceptions to ALJ Report
	350	Commission Staff Prepares Proposed Route Permit
	370	Commission Considers CN and Route Permit Issuance



June 18, 2025

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

RE: Supplemental Comments of the Minnesota Department of Commerce  
Docket No. E002/CN-25-145

Dear Mr. Seuffert:

The Minnesota Department of Commerce (Department) has reviewed the reply comments filed by Northern States Power Company, doing business as Xcel Energy (Xcel). Based on that review the Department recommends **Xcel's petition be declared substantially complete.**

The Department's remaining recommendations remain as stated in comments:

- use the Commission's informal process;
- use a combined review for Xcel's proposed project and its various permits.

The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

SR/ad  
Attachment

## **CERTIFICATE OF SERVICE**

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

### **Minnesota Public Utilities Commission ORDER**

Docket Number: **E-002/CN-25-145; G-002/GS-25-154; E-002/TL-25-161;  
G-002/GP-25-163**

Dated this **14th** day of **July, 2025**

/s/ Robin Benson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	Official 25-145
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-145
3	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	Official 25-145
4	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	Official 25-145
5	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-145
6	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 25-145
7	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	Official 25-145
8	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	Official 25-145
9	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-145
10	Melissa	Sheffer	sheffer.melissa@epa.gov	EPA Region 5			Electronic Service		No	Official 25-145
11	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	Official 25-145

<b>#</b>	<b>First Name</b>	<b>Last Name</b>	<b>Email</b>	<b>Organization</b>	<b>Agency</b>	<b>Address</b>	<b>Delivery Method</b>	<b>Alternate Delivery Method</b>	<b>View Trade Secret</b>	<b>Service List Name</b>
1	Kevin	Adams	kadams@caprw.org	Community Action Partnership of Ramsey & Washington Counties		450 Syndicate St N Ste 35 Saint Paul MN, 55104 United States	Electronic Service		No	GS-25-154
2	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	GS-25-154
3	Justin	Andringa	justin.andringa@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St Paul MN, 55101 United States	Electronic Service		No	GS-25-154
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6	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	GS-25-154
7	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	GS-25-154
8	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
9	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
10	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	GS-25-154
11	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	GS-25-154

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
12	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	GS-25-154
13	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	GS-25-154
14	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	GS-25-154
15	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	GS-25-154
16	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	GS-25-154
17	George	Crocker	gwilc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	GS-25-154
18	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	GS-25-154
19	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	GS-25-154
20	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	GS-25-154
21	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	GS-25-154

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23	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	GS-25-154
24	Eden	Faure	eden.faure@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
25	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	GS-25-154
26	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	GS-25-154
27	Edward	Garvey	garveyed@aol.com	Residence		32 Law ton St Saint Paul MN, 55102 United States	Electronic Service		No	GS-25-154
28	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	GS-25-154
29	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	GS-25-154
30	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	GS-25-154
31	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	GS-25-154
32	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	GS-25-154
33	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney	445 Minnesota St	Electronic Service		No	GS-25-154

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34	Michael	Hoppe	lu23@ibew 23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	GS-25-154
35	Amrit	Hundal	amrit.hundal@ag.state.mn.us		Office of the Attorney General - Department of Commerce		Electronic Service		No	GS-25-154
36	Geoffrey	Inge	ginge@regintllc.com	Regulatory Intelligence LLC		PO Box 270636 Superior CO, 80027-9998 United States	Electronic Service		No	GS-25-154
37	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellow tail Ave. Marathon FL, 33050 United States	Electronic Service		No	GS-25-154
38	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
39	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
40	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
41	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
42	Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center		35 E Wacker Drive Suite 1600 Chicago IL, 60302 United States	Electronic Service		No	GS-25-154
43	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
44	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis	Electronic Service		No	GS-25-154

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
45	Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25- 154
46	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	GS-25- 154
47	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	GS-25- 154
48	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	GS-25- 154
49	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	GS-25- 154
50	Robert	Manning	robert.manning@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	GS-25- 154
51	Ashley	Marcus	ashley.marcus@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	GS-25- 154
52	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	GS-25- 154
53	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	GS-25- 154
54	Greg	Merz	greg.merz@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	GS-25- 154
55	Joseph	Meyer	joseph.c.meyer@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	GS-25- 154

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
56	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	GS-25-154
57	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	GS-25-154
58	Hirsi	Mohamed	hirsi.mohamed@state.mn.us		Public Utilities Commission	121 7th Place E, Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	GS-25-154
59	Marta	Monti	marta@energycents.org	Energy CENTS Coalition		823 E. 7th Street St. Paul MN, 55106 United States	Electronic Service		No	GS-25-154
60	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
61	Christa	Moseng	christa.moseng@state.mn.us		Office of Administrative Hearings	P.O. Box 64620 Saint Paul MN, 55164-0620 United States	Electronic Service		No	GS-25-154
62	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
63	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	GS-25-154
64	Wendy	Raymond	wendy.raymond@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota Street Suite 600 St. Paul MN, 55101 United States	Electronic Service		No	GS-25-154
65	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	GS-25-154
66	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	GS-25-154
67	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis MN, 55401 United States	Electronic Service		No	GS-25-154

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
68	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
69	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
70	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	GS-25-154
71	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180- 07-MCA Minneapolis MN, 55401- 1993 United States	Electronic Service		Yes	GS-25-154
72	Janet	Shaddix Eling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	GS-25-154
73	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	GS-25-154
74	Melissa	Sheffer	sheffer.melissa@epa.gov	EPA Region 5			Electronic Service		No	GS-25-154
75	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	GS-25-154
76	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	GS-25-154
77	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	GS-25-154
78	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
79	Scott	Strand	sstrand@elpc.org	Environmental Law & Policy Center		60 S 6th Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
80	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
81	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	GS-25-154
82	Anthony	Willingham	anthony.willingham@electrifyamerica.com	Electrify America		1950 Opportunity Way Suite 1500 Reston VA, 20190 United States	Electronic Service		No	GS-25-154
83	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154
84	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	GS-25-154
85	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	GS-25-154

First #	Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	TL-25-161
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	TL-25-161
3	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	TL-25-161
4	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	TL-25-161
5	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	TL-25-161
6	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	TL-25-161
7	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	TL-25-161
8	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	TL-25-161

<b>#</b>	<b>First Name</b>	<b>Last Name</b>	<b>Email</b>	<b>Organization</b>	<b>Agency</b>	<b>Address</b>	<b>Delivery Method</b>	<b>Alternate Delivery Method</b>	<b>View Trade Secret</b>	<b>Service List Name</b>
1	Kevin	Adams	kadams@caprw.org	Community Action Partnership of Ramsey & Washington Counties		450 Syndicate St N Ste 35 Saint Paul MN, 55104 United States	Electronic Service		No	PPL-25-163
2	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	PPL-25-163
3	Justin	Andringa	justin.andringa@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St Paul MN, 55101 United States	Electronic Service		No	PPL-25-163
4	Katherine	Arnold	katherine.arnold@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	PPL-25-163
5	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	PPL-25-163
6	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	PPL-25-163
7	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	PPL-25-163
8	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	PPL-25-163
9	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	PPL-25-163
10	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PPL-25-163
11	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	PPL-25-163

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
12	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	PPL-25-163
13	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	PPL-25-163
14	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	PPL-25-163
15	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	PPL-25-163
16	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	PPL-25-163
17	George	Crocker	gwilc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	PPL-25-163
18	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	PPL-25-163
19	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		Yes	PPL-25-163
20	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	PPL-25-163
21	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	PPL-25-163

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
22	Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy		414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	PPL-25-163
23	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	PPL-25-163
24	Eden	Faure	eden.faure@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	PPL-25-163
25	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	PPL-25-163
26	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	PPL-25-163
27	Edward	Garvey	garveyed@aol.com	Residence		32 Law ton St Saint Paul MN, 55102 United States	Electronic Service		No	PPL-25-163
28	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	PPL-25-163
29	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	PPL-25-163
30	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	PPL-25-163
31	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	PPL-25-163
32	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	PPL-25-163
33	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney	445 Minnesota St	Electronic Service		No	PPL-25-163

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					General - Residential Utilities Division	Suite 1400 St. Paul MN, 55101-2134 United States				
34	Michael	Hoppe	lu23@ibew 23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	PPL-25-163
35	Amrit	Hundal	amrit.hundal@ag.state.mn.us		Office of the Attorney General - Department of Commerce		Electronic Service		No	PPL-25-163
36	Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC		PO Box 270636 Superior CO, 80027-9998 United States	Electronic Service		No	PPL-25-163
37	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellow tail Ave. Marathon FL, 33050 United States	Electronic Service		No	PPL-25-163
38	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	PPL-25-163
39	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	PPL-25-163
40	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	PPL-25-163
41	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	PPL-25-163
42	Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center		35 E Wacker Drive Suite 1600 Chicago IL, 60302 United States	Electronic Service		No	PPL-25-163
43	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	PPL-25-163
44	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis	Electronic Service		No	PPL-25-163

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						MN, 55402 United States				
45	Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	PPL-25- 163
46	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	PPL-25- 163
47	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	PPL-25- 163
48	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	PPL-25- 163
49	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	PPL-25- 163
50	Robert	Manning	robert.manning@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	PPL-25- 163
51	Ashley	Marcus	ashley.marcus@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	PPL-25- 163
52	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	PPL-25- 163
53	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	PPL-25- 163
54	Greg	Merz	greg.merz@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	PPL-25- 163
55	Joseph	Meyer	joseph.c.meyer@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	PPL-25- 163

<b>#</b>	<b>First Name</b>	<b>Last Name</b>	<b>Email</b>	<b>Organization</b>	<b>Agency</b>	<b>Address</b>	<b>Delivery Method</b>	<b>Alternate Delivery Method</b>	<b>View Trade Secret</b>	<b>Service List Name</b>
56	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	PPL-25-163
57	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	PPL-25-163
58	Hirsi	Mohamed	hirsi.mohamed@state.mn.us		Public Utilities Commission	121 7th Place E, Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	PPL-25-163
59	Marta	Monti	marta@energycents.org	Energy CENTS Coalition		823 E. 7th Street St. Paul MN, 55106 United States	Electronic Service		No	PPL-25-163
60	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	PPL-25-163
61	Christa	Moseng	christa.moseng@state.mn.us		Office of Administrative Hearings	P.O. Box 64620 Saint Paul MN, 55164-0620 United States	Electronic Service		No	PPL-25-163
62	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	PPL-25-163
63	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	PPL-25-163
64	Wendy	Raymond	wendy.raymond@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota Street Suite 600 St. Paul MN, 55101 United States	Electronic Service		No	PPL-25-163
65	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	PPL-25-163
66	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	PPL-25-163
67	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis MN, 55401 United States	Electronic Service		No	PPL-25-163

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68	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	PPL-25-163
69	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	PPL-25-163
70	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	PPL-25-163
71	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180- 07-MCA Minneapolis MN, 55401- 1993 United States	Electronic Service		Yes	PPL-25-163
72	Janet	Shaddix Eling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	PPL-25-163
73	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	PPL-25-163
74	Melissa	Sheffer	sheffer.melissa@epa.gov	EPA Region 5			Electronic Service		No	PPL-25-163
75	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	PPL-25-163
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