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December 30, 2021

—Via Electronic Filing—

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

RE: COMMENTS  
ILSR AND VOTE SOLAR REQUEST FOR INTERVENOR MODELING COSTS IN  
UTILITY RESOURCE PLAN DOCKETS  
DOCKET NOS. E002/RP-19-368, E015/RP-21-33, E017/RP-21-339

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these Comments in response to the Commission's November 30, 2021 NOTICE OF PROCEDURAL COMMENT PERIOD and the Institute for Local Self-Reliance (ILSR) and Vote Solar's November 2, 2021 Letter. In the Notice, the Commission requested responses to the following two questions:

1. What process should the Commission use to consider the Institute for Local Self-Reliance and Vote Solar (ILSR/VS) request, given multiple ongoing Integrated Resource Plans (IRPs)? For example, should the request be moved to a separate docket, or discussed in individual resource plan dockets?
2. Are there other issues or concerns related to this matter?

In short, we do not think it is necessary to grant ILSR/VS's request given the unprecedented public and stakeholder participation in our IRP proceeding as well as the lack of statutory authority, precedent, and consensus for utility funding of intervenor activities outside of general rate cases. We provide additional comments in the following sections.

**I. The Company's stakeholder engagement and public participation in our IRP docket have been robust and unprecedented.**

The Company unequivocally supports full, transparent, and informed participation in our IRP proceeding and all other dockets.

The initial filing of our IRP followed an unprecedented stakeholder process that included 13 public workshops organized by the Company and approximately five additional workshops hosted by the Commission, with topics from the evolving resource planning process, to more technical considerations, such as transmission and system reliability. We also engaged a third-party consultant—Energy and Environmental Economics, Inc. (E3) to conduct independent, parallel analysis to inform the Company's future resource strategy, which was presented to stakeholders in subsequent workshops.

Since that initial stakeholder engagement, we have witnessed significant public participation in the Resource Planning process, with more than 9,000 public comments and comparative modelling from a half-dozen parties. This engagement is a direct credit to the Commission's commitment to transparency, the Company's public outreach, and the dedication of Minnesota's energy stakeholders. This experience also clearly suggests that utility funding of modelling software for intervenors is not necessary to promoting widespread participation.

**II. There is no clear statutory authority, precedent, or consensus for utility funding of intervening organizations outside of general rate case proceedings.**

Any proposal of utility funding for intervening parties raises questions around statutory authority. While the Minnesota State Legislature has specifically authorized the Commission to require utilities to support intervenors, it has been for limited circumstances related to general rate cases. Minnesota Statute §216B.16, subdivision 10 discusses intervenor compensation in rate proceedings:

*Subd. 10. **Intervenor compensation.***

*(a) A nonprofit organization or an individual granted formal intervenor status by the commission is eligible to receive compensation.*

*(b) The commission may order a utility to compensate all or part of an eligible intervenor's reasonable costs of participation in a general rate case that comes before the commission*

*when the commission finds that the intervenor has materially assisted the commission's deliberation and when a lack of compensation would present financial hardship to the intervenor. Compensation may not exceed \$50,000 for a single intervenor in any proceeding. For the purpose of this subdivision, "materially assisted" means that the intervenor's participation and presentation was useful and seriously considered, or otherwise substantially contributed to the commission's deliberations in the proceeding.<sup>1</sup>*

Minn. Stat. §216B.16, subd. 10, part (b) explicitly limits the Commission's authority to ordering utility compensation of intervenors to general rate cases and does not include IRP proceedings.

We recognize, however, the importance of intervenor participation in dockets beyond general rate cases. That is why we have supported legislation in recent years that would expand the matters for which certain intervenors could be compensated for their participation.<sup>2</sup> That is also why the Company agreed to provide funding for intervenors as part of the Commission's investigation into Winter Storm Uri. However, that instance also demonstrated that utility funding for intervenor participation in regulatory dockets absent authorizing legislation could create issues relating to potential conflicts of interest. One party refused funding in part because of the impact on pending legislative efforts. Another publicly noted that its acceptance of funding from utilities constituted "unique actions that reflect the unique importance and complexity of the Commission's Investigation and that they are not intended to create any precedent[.]"<sup>3</sup>

Given the clear lack of statutory authorization, past precedent, and stakeholder consensus, we believe the proposal made by ILSR/VS would be best handled through a legislative solution. For the Company's part, and as noted above, we have supported – and would expect to continue to support – legislation that provides broader financial support to intervenors participating in our regulatory proceedings, include resource plan proceedings, provided it is consistent with past proposed legislation.

### **III. Generating and interpreting credible modelling results requires specialized experience beyond funding and software access, and**

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<sup>1</sup> Minnesota Statute § 216B.16, subdivision 10.

<sup>2</sup> See H.R. 1289, S.F. 1621, available at:

[https://www.revisor.mn.gov/bills/text.php?number=SF1621&version=latest&session=ls92&session\\_year=2021&session\\_number=0&format=pdf](https://www.revisor.mn.gov/bills/text.php?number=SF1621&version=latest&session=ls92&session_year=2021&session_number=0&format=pdf)

<sup>3</sup> November 4, 2021 Letter from Brian Edstrom, Citizens Utility Board of Minnesota, Docket Nos. G-999/M-21-135, G-008/M-21-138, G-004/M-21-235, G-002/CI-21-610, G-011/CI-21-611.

**overlaps with the role of the Minnesota Department of Commerce in Resource Plan proceedings.**

In their request, ILSR/VS make several claims related to modelling software costs, access, and transparency.

First, with regard to software costs, the Company agrees that specialized modelling software costs can be relatively cost-prohibitive depending on an organization's resources and that costs generally vary depending on the type of software. However, there are also alternatives to purchasing software licenses. Rather than relying on utilities to fund software licenses, intervenors could also hire consultants with an active modelling software license and proven expertise in the Resource Planning, which is what several parties elected to do in this current IRP proceeding.

Regarding public access and transparency of modelling software, it is important to clarify that the Company is not the only party with current access to the EnCompass modelling software. The Minnesota Department of Commerce (Department) also holds an Encompass license for the exact purpose of reviewing and verifying the Company's modelling to ensure our Resource Plan is aligned with the public interest. Given the Department's long-established role in reviewing utility modelling results, and intervenors' ability to retain consultants with their own modelling software and licenses, we believe funding modelling software licenses for intervenors would result in diminished returns for the Resource Planning process.

**IV. Ensuring public transparency in the Resource Planning process is not equivalent to providing unencumbered modelling access for intervenors that may represent a special interest or hold a conflict of interest.**

Apart from utility funding support for modelling software licenses, ILSR/VS's request also included granting intervenors with unfettered access to utility data without need for a data request and without regard to confidentiality issues.

The Company cautions that there could be unforeseen implications in providing unrestricted access to a model, inputs, and assumptions for intervenors that may represent a special interest group or a potential conflict of interest, either with board members or funders that represent a political interest, potential competitors, third-party developers, and/or future RFP bidders. Such modelling information

could provide them with an unfair market advantage that may not be in the public interest and could ultimately cause financial harm to customers.

Further, unrestricted access to the modelling information of Minnesota's three electric investor-owned utilities could potentially give an entity with market interests unprecedented access to otherwise confidential contract and operational information for most of MISO Zone 1. This entity would then have more information than any single utility in the region and, in turn, a significant market advantage.

**V. The Commission should discuss utility funding of intervenors' modelling activities in each utility's separate IRP hearings.**

The Company has experienced historic, unprecedented public participation in our ongoing IRP proceeding and is proud of the transparency and engagement displayed in the record.

Given the public's engagement in our IRP proceeding and the clear lack of statutory authority, past precedent, and stakeholder consensus around utility funding for intervenor activities outside of a general rate case, the Company does not believe ILSR/VS's proposal should be approved. Additionally, for efficiency and expediency, we believe ILSR/VS's request is best handled in each of the utility's currently pending IRP proceedings. The Company, for instance, proposes we discuss ILSR/VS's proposal as part of the Commission's hearing on our IRP early next year.

Should the Commission elect to consider ILSR/VS's proposal in a future or separate proceeding, the Company then believes that additional policy guidance is needed for third-party modelling proposals in future Resource Plan proceedings. Apart from ILSR/VS's requests, we believe the following questions would then need to be addressed:

- How does third-party modelling materially assist Resource Planning proceedings?
- What is the threshold for a "material" contribution?
- What best practices or examples show third-party modelling can improve and/or expedite a Resource Plan proceeding without resulting in further delays, confusion, or costs?

- How should intervenors demonstrate their participation does not represent a conflict of interest or grant their organization an unfair market advantage?
- What requirements or parameters should be placed on third-party Resource Plan modelling or proposals?
- Which government entity should review and verify the inputs, assumptions, and outputs from third-party Resource Planning proposals?

We appreciate this opportunity to comment on ILSR/VS's request and thank the Commission for its time and consideration.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Amber Hedlund at [amber.r.hedlund@xcelenergy.com](mailto:amber.r.hedlund@xcelenergy.com) if you have any questions concerning this filing.

Sincerely,

**BRIA E. SHEA**  
**DIRECTOR, REGULATORY & STRATEGIC ANALYSIS**

c: Service Lists

## CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached lists of persons.

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

xx electronic filing

**Docket Nos.        E002/RP-19-368**  
**E015/RP-21-33**  
**E017/RP-21-339**

Dated this 30<sup>th</sup> day of December 2021

/s/

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Lynnette Sweet  
Regulatory Administrator

[illegible]



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Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-368_19-368_Official
Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC	700 Universe Blvd  Juno Beach, FL 33408	Electronic Service	No	OFF_SL_19-368_19-368_Official
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_19-368_19-368_Official
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_19-368_19-368_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Tim	Wulling	t.wulling@earthlink.net		1495 Raymond Ave.  Saint Paul, MN 55108	Electronic Service	No	OFF_SL_19-368_19-368_Official
Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park	5005 Minnetonka Blvd  St. Louis Park, MN 55416	Electronic Service	No	OFF_SL_19-368_19-368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19- 368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325  Washington, DC 20036	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Laura	Bishop	Laura.Bishop@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd  Saint Paul, MN 55155	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-33_Official CC Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-33_Official CC Service List
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Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Stephanie L	Fitzgerald	sfitzgerald@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515  Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_21-33_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-33_Official CC Service List
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William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora	16 W 2nd Ave N PO Box 160 Aurora, MN 55705	Electronic Service	No	OFF_SL_21-33_Official CC Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Emily	Larson	eLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403 Duluth, MN 55802	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_21-33_Official CC Service List
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_21-33_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4  Canada	Electronic Service	No	OFF_SL_21-33_Official CC Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_21-33_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-33_Official CC Service List
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Jennifer	Peterson	jppeterson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-33_Official CC Service List
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_21-33_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-33_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-33_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Analeisha	Vang	avang@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_21-33_Official CC Service List
Greg	Wannier	greg.wannier@sierraclub.org	Sierra Club	2101 Webster St Ste 1300  Oakland, CA 94612	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_21-33_Official CC Service List

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Laura	Bishop	Laura.Bishop@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_21-339_RP-21-339
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_21-339_RP-21-339
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
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Aaron	Decker	adecker@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515  Saint Paul, MN 55104	Electronic Service	No	OFF_SL_21-339_RP-21-339
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John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-339_RP-21-339
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-339_RP-21-339
Stephanie L	Fitzgerald	sfitzgerald@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515  Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_21-339_RP-21-339



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Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company	PO Box 496  Fergus Falls, MN 56538-0496	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_21-339_RP-21-339
Julie	Goehring	julie@redriverbasincommis sion.org		708 70 Ave NW  Moorhead, MN 56560	Electronic Service	No	OFF_SL_21-339_RP-21-339
Adam	Heinen	aheinen@dakotaelectric.co m	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_21-339_RP-21-339
Shane	Henriksen	shane.henriksen@enbridge .com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	No	OFF_SL_21-339_RP-21-339
Kristin	Henry	kristin.henry@sierraclub.or g	Sierra Club	2101 Webster St Ste 1300  Oakland, CA 94612	Electronic Service	No	OFF_SL_21-339_RP-21-339
Nathan	Jensen	njensen@otpc.com	Otter Tail Power Company	215 S. Cascade St.  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_21-339_RP-21-339
Richard	Johnson	Rick.Johnson@lawmoss.co m	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21-339
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9  Chicago, IL 60604	Electronic Service	No	OFF_SL_21-339_RP-21-339

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kate	Knuth	kate.knuth@gmail.com		2347 14th Terrace NW New Brighton, MN 55112	Electronic Service	No	OFF_SL_21-339_RP-21-339
Randy	Kramer	rlkramer89@gmail.com	Water and Soil Resources Board	42808 Co. Rd. 11 Bird Island, MN 55310	Electronic Service	No	OFF_SL_21-339_RP-21-339
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21-339
Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_21-339_RP-21-339
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-339_RP-21-339
Jan	Malcolm	Health.Review@state.mn.us	Minnesota Department of Health	PO Box 64975 St. Paul, MN 55164-0975	Electronic Service	No	OFF_SL_21-339_RP-21-339
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21-339
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_21-339_RP-21-339
Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_21-339_RP-21-339
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-339_RP-21-339

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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John	Saxhaug	john_saxhaug@yahoo.com		3940 Harriet Ave Minneapolis, MN 55409	Electronic Service	No	OFF_SL_21-339_RP-21-339
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 St. Paul, Minnesota 55104	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_21-339_RP-21-339
Cameron	Winton	winton.cam@dorsey.com	Dorsey & Whitney LLP	50 S 6TH ST STE 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21-339
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21-339