

December 30, 2021

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. E-002/RP-19-368, E-015/RP-21-33, and E-017/RP-21-339

Dear Mr. Seuffert:

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

Xcel Energy's 2020-2034 Integrated Resource Plan.

Minnesota Power's 2021-2035 Integrated Resource Plan.

Otter Tail Power Company's 2022-2036 Integrated Resource Plan.

Institute for Local Self-Reliance and Vote Solar Request for Commission Consideration of Intervenor Modeling Costs in Utility Resource Plan Dockets

The Petition was filed on November 2, 2021 by:

John Farrell
Institute for Local Self-Reliance
2720 E. 22nd St.
Minneapolis, MN 55406

Will Kenworthy, Regulatory Director, Midwest
Vote Solar
332 S Michigan Ave FL 9
Chicago, IL 60604

The Department recommends the Minnesota Public Utilities Commission **reject the petition without prejudice and allow the parties to provide a more complete petition at a later date**, as listed further in these comments. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Steve Rakow
Analyst Coordinator

SR/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. E-002/RP-19-368, E-015/RP-21-33, and E-017/RP-21-339

I. INTRODUCTION

On November 2, 2021, ILSR and Vote Solar (ILSR/VS) filed a request asking the Minnesota Public Utilities Commission (Commission) to order public utilities subject to the Commission's resource planning requirements to acquire EnCompass modeling licenses for intervening organizations in resource plan dockets.

ILSR/VS further requested the Commission consider requiring utilities to provide, without a data request, modeling inputs, including settings and outputs, assumptions, any post-processing spreadsheets, and the model manual. The petition was filed in the pending Xcel Energy, Minnesota Power, and Otter Tail Power resource plan dockets.

ILSR/VS cite Minnesota Statutes § 216B.2422 Subd. 2, Minnesota's resource planning statute, as supporting a finding that it would be in the public interest for utilities to provide free access to modeling licenses in integrated resource plans. Specifically, ILSR/VS state:

A robust stakeholder process involving transparent access to modeling software better ensures that the resulting resource plan benefits from a full array of perspectives and areas of expertise. Requiring utilities to pay a few thousand dollars to cover modeling costs for intervenors can save electric customers millions of dollars in the end by finding the most cost-effective resource plans.

On November 30, 2021 the Commission issued its *Notice of Procedural Comment Period*, which stated that the following topics are open for comment:

1. What process should the Commission use to consider the Institute for Local Self-Reliance and Vote Solar (ILSR/VS) request, given multiple ongoing 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?

II. DEPARTMENT ANALYSIS

A. *MORE DETAIL IS REQUIRED IN ORDER TO FULLY CONSIDER THE PETITION*

The lack of detail in the petition leads the Department to recommend that ILSR/VS should be allowed to provide additional detail before its petition could be fully commented on and considered on its merits.

For instance, the first page of ILSR/VS's petition states that licenses for "...this kind of modeling software can be prohibitively expensive...".¹ However, ILSR/VS do not provide a cost estimate and in the Department's experience, the license for modeling software will not be the most expensive component of integrated resource plan (IRP) participation; rather, hiring a modeler will be significantly more expensive than cost of the Encompass license. In addition, ILSR/VS have not stated whether the proposal involves acquiring the computers necessary to run the adequately run the software. ILSR/VS should file a revised petition stating whether the costs to retain a modeler and computers are also prohibitively expensive. Further, ILSR/VS should provide estimates of each of the costs it is requesting be covered; only then could the Department and other commenters better evaluate the benefits and costs of the petition.

It is not clear if ILSR/VS intend for each utility to purchase licenses for each intervenor, if one license is to be purchased and shared by intervenors, if there are limits on the number of licenses to be acquired and so on. Without a clear statement on the quantity of licenses at issue it is not possible to estimate the cost of the proposal nor whether the proposal is in the public interest.

It is also not clear whether ILSR/VS is asking the Commission to direct the utilities to pay for these costs in the currently pending IRPs, or for the next (yet-to-be scheduled) IRPs. The Xcel IRP has been open since July 2019 and as of the date of the writing of these comments, 2,227 have been documents filed in the record, including IRs and comments from ILSR/VS². No comment due dates are pending for the Xcel IRP. The MP IRP has already been open since February 2021; the Department is conducting its modeling and anticipates filing its comments on February 28, 2022, the current comment deadline set by the Commission. Finally, OTP's IRP has been open since September 2021 and the current comment deadline is April 11, 2022.

¹ Note that for 2019 VS reported revenues of about \$6.8 million and ILSR reported revenues of about \$3.5 million; see their annual Department of the Treasury, Internal Revenue Service Form 990s, available at guidestar.org, for details. For context, the Commission's annual budget is about \$8.3 million for FY2020.

² Edockets indicates that ILSR/VS filed comments in February 2021 and issued 23 IRs to Xcel in the currently pending IRP.

Consistent with normal Commission practice, the initial filing date for each of these three IRPs was set by order well in advance; for instance, OTP's Sept 1, 2021 IRP filing date was set by PUC Order on December 30, 2019. IRPs are one of the few dockets where the filing date is set by Order, after a discussion at an agenda meeting. This is unusual among dockets, and is done in part to ensure that IRPs are timed so that the Commission can consider and make resource decisions in time for utility resource planning and acquisition. Parties therefore have ample lead time to determine what resources they may need in order to participate in IRPs.

In the Department's experience, once a party obtains a license and modeler, it may take 6 months to one year for the modeler to learn EnCompass, become familiar with each utility's modeling processes, conduct new modeling runs, and file comments. It may be more appropriate for the Commission to determine that a filing like ILSR/VS must be filed prior to each utility's next IRP. The Department suggests that the Commission establish a filing deadline of 4 months prior to each utility's IRP.

On the second part of ILSR/VS's request, for utilities to provide certain data without an Information Request (IR), the Department again suggests that this appears to be an issue that should be taken up prior to a utility's IRP being filed, so that the utility can provide all information directed by the PUC in its initial filing.

B. SHOULD THE COMMISSION TAKE UP THE MERITS OF THE PETITION AT A LATER DATE, IT MAY NEED TO ESTABLISH CRITERIA

ILSR/VS's petition also should be revised to spell out what criteria the Commission would be using in considering its filing. It should include a discussion of the rate case intervenor compensation statute and what authority the Commission would be using to require compensation for these expenses. ILSR/VS's current filing focuses on the expense of the license; however, if expense were the only criteria for requiring utilities to pay for a license, then one imagines that dozens of organizations will follow with similar requests and expect to have them granted. The rate case intervenor compensation statute, currently the only statute which allows for compensation for intervenors, sets up a structure and process whereby the intervenor must first participate in the docket without compensation, demonstrate that no other funding is available, and then at the conclusion show that they have "materially assisted the Commission's deliberation."³ That statute lists other criteria for the Commission to consider.

Further, depending on how the license is structured, if organizations were given a paid-for EnCompass license, they might be able to use that license for other state proceedings, even though Minnesota ratepayers would have paid for that expense. In such instances the Commission would need to determine how it would establish criteria for cost sharing with other jurisdictions.

³ Minn. Stat. §216B.16 subd.10.

The Department wishes to clarify it welcomes the participation of all stakeholders in IRP and other proceedings, and meets with stakeholders during the course of pending proceedings to identify ways to collaborate, share information, and develop the record in the manner most useful to the Commission. The purpose of the Department's comments at this time are to provide recommendations that encourage certainty, clarity, and structure during proceedings. One important element of encouraging participation and transparency in Commission proceedings is for there to be clear "rules of the road" so that the expectations of stakeholders are known well in advance of the proceeding. The Department's recommendations below are written with this goal in mind.

III. DEPARTMENT RECOMMENDATION

- 1) Deny without prejudice the request of ILSR/VS. Find that ILSR/VS may refile their petition no later than four months prior to Xcel's, MP's, and OTP's next IRPs. Any filing requesting compensation or payment for modeling license or other resources shall include the following information:
 - a) A discussion of the rate case intervenor compensation statute, as well as any relevant statutes, rules, or other legal considerations that must be considered in such a request;
 - b) A full list of the expenses ILSR/VS are requesting the Commission order the utilities to pay for, the estimated dollar amounts for each, and a cost benefit analysis, including non-monetary benefits and costs, demonstrating that benefits exceed costs;
 - c) An explanation of how the Encompass license could be used in other jurisdictions' proceedings, and a proposal to share costs with those proceedings; and
 - d) Further explanation on the criteria the Commission should use to decide on the merits of these petitions.

AND

- 2) Upon receiving a revised petition, the Commission issue a notice requesting comments on the criteria the Commission should use to issue a decision on the merits of the request, as well as any other topics the Executive Secretary deems necessary to build the record.

CERTIFICATE OF SERVICE

I, Marcella Emeott, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

MINNESOTA DEPARTMENT OF COMMERCE – COMMENTS

Docket Nos. E-002/RP-19-368, E-015/RP-21-33, and E-017/RP-21-339

Dated this **30th** day of **December 2021**

/s/Marcella Emeott

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| 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_19-368_19-368_Official |
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| Andrew R. | Shedlock | Andrew.Shedlock@KutakRock.com | Kutak Rock LLP | 60 South Sixth St Ste 3400 Minneapolis, MN 55402-4018 | 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 |
|------------|-----------|--------------------------------|---|---|--------------------|-------------------|-------------------------------|
| Joshua | Smith | joshua.smith@sierraclub.org | | 85 Second St FL 2 San Francisco, California 94105 | Electronic Service | No | OFF_SL_19-368_19-368_Official |
| Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | 76 W Kellogg Blvd St. Paul, MN 55102 | Electronic Service | No | OFF_SL_19-368_19-368_Official |
| Beth H. | Soholt | bsoholt@windonthewires.org | Wind on the Wires | 570 Asbury Street Suite 201 St. Paul, MN 55104 | Electronic Service | No | OFF_SL_19-368_19-368_Official |
| Anna | Sommer | ASommer@energyfuturesgroup.com | Energy Futures Group | PO Box 692 Canton, NY 13617 | Electronic Service | No | OFF_SL_19-368_19-368_Official |
| Mark | Spurr | mspurr@fvbenergy.com | International District Energy Association | 222 South Ninth St., Suite 825 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_19-368_19-368_Official |
| Byron E. | Starns | byron.starns@stinson.com | STINSON LLP | 50 S 6th St Ste 2600 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_19-368_19-368_Official |
| Scott | Strand | SStrand@elpc.org | Environmental Law & Policy Center | 60 S 6th Street Suite 2800 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_19-368_19-368_Official |
| James M | Strommen | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered | 150 S 5th St Ste 700 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_19-368_19-368_Official |
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | 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 |
|------------|-----------|-------------------------------------|-------------------------------------|---|--------------------|-------------------|-------------------------------|
| Lynnette | Sweet | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | No | OFF_SL_19-368_19-368_Official |
| Thomas | Tynes | jjazynka@energyfreedomcoalition.com | Energy Freedom Coalition of America | 101 Constitution Ave NW Ste 525 East Washington, DC 20001 | Electronic Service | No | OFF_SL_19-368_19-368_Official |
| 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@grenergy.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 |
| Hillary | Creurer | hcreurer@allte.com | Minnesota Power | 30 W Superior St Duluth, MN 55802 | Electronic Service | No | OFF_SL_21-33_Official CC Service List |
| 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 |
| Adam | Heinen | aheinen@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024 | Electronic Service | No | OFF_SL_21-33_Official CC Service List |
| Sarah | Johnson Phillips | sarah.phillips@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_21-33_Official CC Service List |
| 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 |
| 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 |
| 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 |
| 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 | jjpeterson@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 PI 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 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------|-----------------------------------|---|---|--------------------|-------------------|-------------------------|
| 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 |
| Brooke | Cooper | bcooper@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022191 | Electronic Service | No | OFF_SL_21-339_RP-21-339 |
| 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 |
| Kristin W | Duncanson | kristin@duncansongrowers.com | | 57746 Highway 30 Mapleton, MN 56065 | Electronic Service | No | OFF_SL_21-339_RP-21-339 |
| James C. | Erickson | jericksonkbc@gmail.com | Kelly Bay Consulting | 17 Quechee St Superior, WI 54880-4421 | Electronic Service | No | OFF_SL_21-339_RP-21-339 |
| 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 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|---------------------------------------|---|---|--------------------|-------------------|-------------------------|
| Barb | Freese | bfreese@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 |
| 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 |
|------------|------------|--------------------------------|---|--|--------------------|-------------------|-------------------------|
| Stephan | Roos | stephan.roos@state.mn.us | MN Department of Agriculture | 625 Robert St N Saint Paul, MN 55155-2538 | Electronic Service | No | OFF_SL_21-339_RP-21-339 |
| 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 |