



414 Nicollet Mall  
Minneapolis, MN 55401

May 16, 2022

—Via Electronic Filing—

The Honorable Kimberly Middendorf  
Office of Administrative Hearings  
600 N. Robert Street  
P.O. Box 64620  
Saint Paul, MN 55164-0620

RE: IN THE MATTER OF THE APPLICATION OF XCEL ENERGY FOR A SITE  
PERMIT AND TWO ROUTE PERMITS FOR THE UP TO 460 MEGAWATT SHERCO  
SOLAR ENERGY GENERATING SYSTEM AND ASSOCIATED 345 KILOVOLT  
TRANSMISSION LINES IN SHERBURNE COUNTY, MINNESOTA  
MPUC DOCKET NOS. E002/TL-21-189, E002/TL-21-190, E002/GS-21-  
191  
OAH DOCKET NO. 21-2500-37959

Dear Judge Middendorf:

Northern States Power Company, doing business as Xcel Energy, (“Company” or “Applicant”) submits this letter in response to comments received in this matter and raised during the in-person and remote-access public hearings held on April 20 and 21, 2022, respectively, on the Company’s Application for a Site and two Route Permits for an up to 460-Megawatt solar energy generating system and two 345 kilovolt transmission lines in Sherburne County, Minnesota (the “Project”). Specifically, we address the request from the International Brotherhood of Electrical Workers “IBEW” Local 292 that Minnesota Statutes Sections 326B.31 through 326B.399, and related rules, apply—without exception—to the Project, as reflected in its letter dated May 20, 2022.<sup>1</sup> We also address comments received from the Minnesota Department of Commerce Energy Environmental Review Analysis (“EERA”) staff on behalf of the interagency Vegetation Management Planning Working Group (“VMPWG”) on April 14, 2022, regarding the revised Vegetation Management Plan submitted by the Company on December 1, 2021, EERA on May 5, 2022, regarding the decommissioning plan for the Project, the Minnesota Department of Natural Resources (“DNR”) on May 5, 2022 and members of the public before the close of the comment period on May 5, 2022.

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<sup>1</sup> Although the letter is dated May 20, 2022, it was filed as a public comment on April 25, 2022.

Moreover, we note and appreciate the oral comments and letters of support for the Project from Laborers' International Union of North America ("LIUNA") Minnesota & North Dakota, North Central States Regional Council of Carpenters, AFL-CIO Minnesota, Minnesota Farmers Union, Center for Energy and Environment, International Union of Operating Engineers Local 49, Representative Jamie Long and other members of the public.

**Response to IBEW Comments Regarding Minnesota Statutes Sections 326B.31 through 326B.399**

Under Minnesota Statutes Sections 326B.33, Subd. 21(e), utilities are exempt from licensing requirements of Sections 326B.31 through 326B.399, with respect to work performed on, among other things, utility-owned generation and transmission facilities:

*(e) Employees of any electrical, communications, or railway utility, cable communications company as defined in section 238.02, or a telephone company as defined under section 237.01 or its employees, or of any independent contractor performing work on behalf of any such utility, cable communications company, or telephone company, shall not be required to hold a license under sections 326B.31 to 326B.399:*

*(1) while performing work on installations, materials, or equipment which are owned or leased, and operated and maintained by such utility, cable communications company, or telephone company in the exercise of its utility, antenna, or telephone function, and which:*

*(i) are used exclusively for the generation, transformation, distribution, transmission, or metering of electric current, or the operation of railway signals, or the transmission of intelligence and do not have as a principal function the consumption or use of electric current or provided service by or for the benefit of any person other than such utility, cable communications company, or telephone company; and*

*(ii) are generally accessible only to employees of such utility, cable communications company, or telephone company or persons acting under its control or direction; and*

*(iii) are not on the load side of the service point or point of entrance for communication systems;*

*(2) while performing work on installations, materials, or equipment which are a part of the street lighting operations of such utility; or*

*(3) while installing or performing work on outdoor area lights which are directly connected to a utility's distribution system and located upon the utility's distribution poles, and which are generally accessible only to employees of such utility or persons acting under its control or direction.*

Under Minnesota Statutes Section 326B.36, Subd. 7(2)(ii), utilities are similarly exempt from the inspection requirements of Sections 326B.31 through 326B.399:

*Installations, materials, or equipment shall not be subject to inspection under sections 326B.31 to 326B.399:*

*...*

*when owned or leased, and operated and maintained by any electrical, communications, or railway utility, cable communications company as defined in section 238.02, or telephone company as defined under section 237.01, in the exercise of its utility, antenna, or telephone function; and*

*(i) are used exclusively for the generations, transformation, distribution, transmission, or metering of electric current, or the operation of railway signals, or the transmission of intelligence, and do not have as a principal function the consumption or use of electric current by or for the benefit of any person other than such utility, cable communications company, or telephone company; and*

*(ii) are generally accessible only to employees of such utility, cable communications company, or telephone company or persons acting under its control or direction; and*

*(iii) are not on the load side of the service point or point of entrance for communication systems*

Because the Project will be owned by the Company when constructed and generally only accessible by Company employees, the construction work on the Project is exempt from the applicable licensing and inspection requirements of these Sections. As noted in the May 5, 2022 Comments from the North Central States Regional Council of Carpenters, the Company's exemption from these Sections was confirmed in the January 11, 2022 meeting of the State Board of Electricity, when the General Counsel for the Department of Labor and Industry

verified the Project would meet the requirements for these exemptions. The Company, moreover, has not and does not agree to waive these exemptions. Notwithstanding the foregoing, the Company will follow the safety and construction standards contained within the National Electrical Code, as adopted by Minnesota.

While other solar installations in the state may have followed the licensing and inspection requirements of Sections 326B.31 through 326B.399, we are unaware of any such projects being completed by utilities, and therefore subject to the exemptions under Sections 326B.33, Subd. 21(e) and 326B.36, Subd. 7(2)(ii). And, contrary to the suggestion in IBEW's letter, applying the exemptions will not have a negative impact on the Project's ability to support local workers, diversity and inclusion, and apprenticeship and training opportunities. A key requirement of the Company's solicitation for the Project specified that bids include the use of union labor for Project construction. Consistent with this requirement, and as noted elsewhere in this record, the Company will use local union labor to construct the Project:

*The Solar Project will also create new local job opportunities for various trade professionals that live and work in the area and it is typical to advertise locally to fill required construction positions. Xcel Energy will utilize union labor to construct the Solar Project. Use of union labor will ensure the payment of prevailing wages for construction workers. Xcel Energy estimates, the Project will provide an estimated \$115 million in wages from nearly 900 union construction jobs.<sup>2</sup>*

The Project will also provide the first opportunity for implementation of the Company's recently-approved Workforce and Training Development Program on a project, which will help provide utility industry skills and training to women and members of the black, indigenous and people of color ("BIPOC") community.<sup>3</sup> The contractors who have bid on our Project submitted pricing and workforce planning based not only on these requirements, but also the assumption that the utility exemptions would continue to apply.

None of the local workforce benefits from the Project, moreover, are tied to the application of the exemptions under Section 326B.33, Subd. 21(e) or 326B.36, Subd. 7(2)(ii), which are normal elements of the Company's business. For

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<sup>2</sup> Application for a Site Permit and Two Route Permits for the Sherco Solar Project, at 93, April 20, 2021; Direct Testimony of Aaron Brixius, at 3, April 6, 2022.

<sup>3</sup> Application for a Site Permit and Two Route Permits for the Sherco Solar Project, at 93.

example, the Company's standard construction and maintenance work at Company-controlled generation facilities falls within the utility exemptions. For the foregoing reasons, we respectfully request that the exemptions continue to apply to the Project as they do to all other utility-owned generation and transmission projects.

### **Response to the VMPWG**

The VMPWG provided various comments regarding the Company's revised Vegetation Management Plan including the use of defined management units to aid in establishment, monitoring and maintenance of the Project's vegetation, site preparation and seeding, seed mixes, herbicides and weed control, and general concerns regarding Project scale and implementation.

The Company looks forward to continued collaboration with the VMPWG to develop a final Vegetation Management Plan that will aid it in meeting the "gold standard" of the Minnesota Board of Water and Soil Resources Wildlife Friendly Solar Program. The Company recognizes the significant benefits that the site can provide to pollinator species and overall watershed health by converting large tracts of agricultural land to long term, perennial vegetative cover and looks forward to being a leader in vegetation management in utility-scale solar installations in Minnesota. We appreciate the DNR's previous comments from September 15, 2021 noting it "appreciates the applicant's extensive early project coordination regarding the Vegetation Management Plan. From our agency's perspective, this project has the potential to provide valuable pollinator habitat. We appreciate the effort made to refine the native seed mixes to suit site conditions and pollinator needs. DNR staff, in conjunction with other members of the Vegetation Management Working Group, look forward to further coordination on the applicant's recently updated plan."

In coordination with the VMPWG, the Company has made significant updates to the Vegetation Management Plan. The Company is confident that with some additional VMPWG coordination, targeted changes and incorporation of information from the final selected Project contractor, the Vegetation Management Plan can be finalized for implementation. The Company looks forward to continuing the dialogue based on the VMPWG's most recent comments. The next scheduled meeting with the VMPWG is May 17, 2022.

We have no objection to inclusion of site permit language to ensure the preparation of a final Vegetation Management Plan prior to construction. Section 4.3.9 of the Sample Site Permit filed to eDocket No. E002/GS-21-191 on

November 24, 2021 (“Sample Site Permit”) requires the submission of a Vegetation Management Plan prior to the pre-construction meeting.

### **Response to EERA’s Comments Regarding Decommissioning**

EERA staff provided comments regarding the Project’s Decommissioning Plan with regard to organization, objectives, additional information, and financial assurance methods. EERA staff recommended an updated decommissioning plan be developed prior to the pre-construction meeting.

Regarding financial surety, the original decommissioning plan for the Project incorrectly asserted the Company will guaranty adequate funding for decommissioning of the Project using a financial surety. Instead, the Company will utilize the net salvage rate methodology used for all its generation facilities. At the time of decommissioning, the costs of removal will be treated as a debit to the Company’s depreciation reserve and the reserve balance will be reduced. The decommissioning plan for the Project will be updated to reflect this methodology and, in a separate docket, the Company will seek Commission approval of the net salvage rates used for the Project.

Section 9.1 of the Sample Site Permit requires the Company to submit a decommissioning plan at least 14 days prior to the pre-operation meeting. The Company has no objection to this condition.

### **Response to DNR Comments**

The DNR’s comments addressed snowmobile trails, loggerhead shrike, Blanding’s turtle, security fencing, wildlife-friendly erosion control, facility lighting, vegetation management plan, dust control, avian flight diverters, and constructing near wetlands.

#### Snowmobile Trail

DNR staff proposed adding a special permit condition requiring the permittee to coordinate with the local snowmobile trail associations to reroute County Trail #209247.

The Company has initiated conversations with the Big Lake Sno Cruisers, the local snowmobile club, who posted a letter of support for the Project on May 20, 2021. The Company remains committed to coordinating any necessary reroutes with the Big Lake Sno Cruisers prior to construction and has no objection to including a

special condition regarding snowmobile reroutes. Accordingly, the Company proposes the following modified site permit special condition as modified from that which was included in the Sample Site Permit:

### ***Snowmobile Trail***

*The Permittee shall coordinate with local snowmobile trail associations to reroute Sherburne County Trail #209247. At least ~~30~~ 14 days prior to the preconstruction meeting, the Permittee shall provide the Commission with documentation identifying the location of the rerouted snowmobile trail.*

### **Loggerhead Shrike**

DNR staff proposed adding a special condition requiring adherence to tree and shrub removal restrictions between April 1<sup>st</sup> and July 31<sup>st</sup>.

The Company committed to avoidance of tree and shrub removal between April 1<sup>st</sup> and July 31<sup>st</sup> on page 174, 176, and 177 of the Site and Route Permit Application for the Project. Accordingly, the Company has no objection to including a special permit condition for the loggerhead shrike and proposes the following special permit condition for the site and route permits:

### ***Loggerhead Shrike***

*“The Permittee shall avoid the removal of trees and shrubs for the facility between April 1<sup>st</sup> and July 31<sup>st</sup>, unless coordinated with the DNR.”*

### **Blanding’s Turtle**

DNR staff proposed a special condition for Blanding’s turtle avoidance measures.

The Company committed to various protective measures for the Blanding’s turtle on Page 174 of the Site and Route Permit Application and remains committed to these measures. The Company holds no objection to including a special condition regarding these measures and proposes the following special permit condition for the site and route permits:

### ***Blanding’s Turtle***

*The Permittee shall initiate the following measures during construction to avoid and or mitigate for impacts to the Blanding’s turtle during construction:*

- *Avoid wetland impacts during hibernation season, between October 15th and April 15th, unless the area is unsuitable for hibernation*

- *Provide the DNR developed Blanding's turtle flyer to all contractors working in the area.*
- *Monitor for turtles during construction and report any sightings to the DNR Nongame Specialist.*
- *If turtles are in imminent danger, they must be moved by hand out of harm's way, otherwise they are to be left undisturbed.*

#### Security Fencing

DNR staff proposed a special permit condition requiring additional coordination with the DNR and EERA to develop a satisfactory fencing plan.

The Company notes that while the Environmental Assessment prepared by EERA for the Project noted that 6-foot fence topped with 3 strands of smooth wire would be used for the Project, in the Site and Route Permit Application, the Company proposed an 8-foot agricultural woven wire fence, without additional wire strands on top of the fence. The Company continues to coordinate with the DNR regarding best practices for fencing and has no objection to including a special permit condition to coordinate with the DNR to develop a final fencing plan. In lieu of the special permit condition related to perimeter fencing included in the Sample Site Permit, the Company proposes the following special site permit condition for the site permit:

#### ***Perimeter Fencing***

*The Permittee shall coordinate with the DNR to further refine the appropriate fence design. The results of the coordination shall be submitted to the Commission with the site plan pursuant to Section 8.3.*

#### Wildlife-Friendly Erosion Control

DNR staff proposed a special permit condition for wildlife-friendly erosion control.

The Company holds no objection to including a special permit condition related to wildlife friendly erosion control and proposes the following special site permit condition for the site permit and route permits:

#### ***Wildlife-Friendly Erosion Control***

*The Permittee shall use only "bio-netting" or "natural netting" types of erosion control materials and mulch products without synthetic (plastic) fiber additives.*



### Facility Lighting

DNR staff recommended a special permit condition for downward facing lighting that minimizes blue hue at the Project substations.

The Company has no objection to including a special permit condition in the site permit to implement shielded, downward facing and LED lighting measures at the Project substations that minimize blue hue and proposes the following site permit condition, which is slightly modified from that which was proposed by the DNR:

### **Facility Lighting**

*Permittee must use shielded and downward facing lighting and LED lighting that minimizes blue hue at the project substations. Downward facing lighting must be clearly visible on the site plan submitted for the project.*

### Vegetation Management Plan

DNR staff recommend continued coordination with the VMPWG. DNR staff also proposed the restriction of mowing between April 15<sup>th</sup> and August 15<sup>th</sup>.

The Company maintains that the facility is first and foremost an energy producing facility that needs to be properly maintained as an energy producing facility. We acknowledge and support that Section 4.3.8 of the Sample Site Permit requires the implementation of native perennial vegetation and foraging habitat beneficial to gamebirds, songbirds and pollinators. We believe the facility can be operated in a manner that provides beneficial habitat as required under Section 4.3.8. However, implementing mowing season restrictions such as those proposed by the DNR would severely limit the time within which vegetation management activities could occur and would suggest that habitat creation is more important than energy generation. The large size of the facility will take a significant amount of time to mow and maintain and such maintenance activities are likely to occur within the dates suggested by the DNR. For example, while seeding selection is being carefully considered to limit vegetation height, some panel shading is possible if vegetation is left for long periods of growth. Shading of panels would adversely impact solar production. The Company cannot commit to restrictions to mowing due to the need to maintain the facility in an acceptable condition to maximize solar energy production. The Company remains committed to working with the VMPWG to discuss vegetation management issues further, and feels that any concerns from the DNR regarding mowing duration or timing can be addressed via additional coordination within the VMPWG, and in the final Vegetation Management Plan.

### Dust Control

DNR staff recommended a special permit condition for dust control measures containing chloride products.

The Company has no objection to including a special permit condition in the site permit to implement non-chloride dust control methods and proposes the following special permit condition for the site permit:

### ***Dust Control***

*Permittee shall utilize non-chloride products for onsite dust control during construction.*

### Avian Flight Diverters

DNR staff recommended a special permit condition for the addition of the transmission lines for migratory birds due to the proximity to the Mississippi River.

Section 5.3.15 of the Sample Route Permit, filed to Docket Nos. E002/TL-21-189 and E002/TL-21-190 on November 24, 2021, requires that the Company coordinate with the DNR to identify areas where bird flight diverters will be incorporated into the transmission line design. The Company has no objection to this Section 5.3.15 and will coordinate with the DNR on placement of bird flight diverters.

### Site Alternative 1A

The DNR noted that revisions of the Project design to accommodate Site Alternative 1A may reduce the distance between solar panels and wetlands within the Project area. The DNR encouraged the avoidance of wetlands and recommended adherence to local regulations related to wetland buffers.

The Company remains committed to avoidance of wetlands across the site, and no impacts to wetlands are anticipated due to potential solar panel infill associated with a revised Project design for Site Alternative 1A. Section 4.3.5 of the Sample Site Permit contains specific permit requirements related to wetlands and is sufficient to ensure wetlands and riparian areas are protected. Accordingly, no additional special permit condition is necessary.

We have electronically filed this document, and copies have been served on the parties on the attached service lists. Please contact me at

[bria.e.shea@xcelenergy.com](mailto:bria.e.shea@xcelenergy.com) or (612) 330-6064 if you have any questions regarding our RFP process or this filing.

Sincerely,

*/s/ Bria E. Shea*

BRIA E. SHEA  
REGIONAL VICE PRESIDENT, REGULATORY POLICY

c: Service List

**Certificate of Service**

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**In the Matter of the Application of Xcel Energy for a  
Route Permit for the West 345 kV transmission line  
for the Sherco Solar Project in Sherburne County.  
Docket No. E-002/TL-21-189**

**In the Matter of the Application of Xcel Energy for a  
Route Permit for the East 345 kV transmission line  
for the Sherco Solar Project in Sherburne County.  
Docket No. E-002/TL-21-190**

**In the Matter of the Application of Xcel Energy for a  
Site Permit for the up to 460 MW Sherco Solar  
Project in Sherburne County.  
Docket No. E-002/GS-21-191**

**OAH Docket No. 21-2500-37959**

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Breann L. Jurek certifies that on the 16<sup>th</sup> day of May 2022, she e-filed on behalf of Northern States Power Company, doing business as Xcel Energy true and correct copies of the following documents:

1. Response to Public Comments; and
2. Certificate of Service.

A copy has also been served on the individuals listed on the attached service lists.

Executed on: May 16, 2022

Signed: /s/ Breann L. Jurek  
Fredrikson & Byron, P.A.  
200 South Sixth Street  
Suite 4000  
Minneapolis, MN 55401

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-189_Official CC Service List
Judge Kimberly	Middendorf	kimberly.middendorf@state.mn.us	Office of Administrative Hearings	PO Box 64620  Saint Paul, MN 55164-0620	Electronic Service	Yes	OFF_SL_21-189_Official CC Service List
Marie	Pflipsen	mpflipsen@ci.becker.mn.us	City of Becker	12060 Sherburne Avenue PO BOX 250 Becker, Minnesota 55308	Electronic Service	No	OFF_SL_21-189_Official CC Service List
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_21-189_Official CC Service List
Victoria	Reinhardt	Victoria.Reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy	Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-189_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_21-189_Official CC Service List
William	Risse	wrisse@nationalgridrenewables.com	National Grid Renewables Development, LLC	8400 Normandale Blvd Ste 1200  Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-189_Official CC Service List
Melissa	Schmit	melissa@nationalgridrenewables.com	National Grid Renewables	8400 Normandale Lake Blvd Ste 1200  Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-189_Official CC Service List
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_21-189_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-189_Official CC Service List
William	Storm	bill.storm@state.mn.us	Department of Commerce	Room 500 85 7th Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_21-189_Official CC Service List
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-189_Official CC Service List
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-189_Official CC Service List

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Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-190_Official CC Service List
Judge Kimberly	Middendorf	kimberly.middendorf@state.mn.us	Office of Administrative Hearings	PO Box 64620  Saint Paul, MN 55164-0620	Electronic Service	Yes	OFF_SL_21-190_Official CC Service List
Marie	Pflipsen	mpflipsen@ci.becker.mn.us	City of Becker	12060 Sherburne Avenue PO BOX 250 Becker, Minnesota 55308	Electronic Service	No	OFF_SL_21-190_Official CC Service List
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_21-190_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_21-190_Official CC Service List
William	Risse	wrisse@nationalgridrenewables.com	National Grid Renewables Development, LLC	8400 Normandale Blvd Ste 1200  Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-190_Official CC Service List
Melissa	Schmit	melissa@nationalgridrenewables.com	National Grid Renewables	8400 Normandale Lake Blvd Ste 1200  Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-190_Official CC Service List
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_21-190_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_21-190_Official CC Service List

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Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-190_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Aaron	Brixius	Aaron.P.Brixius@xcelenergy.com	Xcel Energy	414 Nicollet Mall  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-191_Official CC Service List
Jordan	Burmeister	jordan@nationalgridrenewables.com	National Grid Renewables Development, LLC	8400 Normandale Boulevard Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-191_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_21-191_Official CC Service List
Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.	200 South Sixth Street Suite 4000  Minneapolis, Minnesota 55402-1125	Electronic Service	No	OFF_SL_21-191_Official CC Service List
Scott	Ek	scott.ek@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-191_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_21-191_Official CC Service List
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E  Little Canada, MN 55117	Electronic Service	No	OFF_SL_21-191_Official CC Service List
Gary	Gray	cltwpchair@hotmail.com	Clear Lake Township	PO Box 305  Clear Lake, MN 55319	Electronic Service	No	OFF_SL_21-191_Official CC Service List
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-191_Official CC Service List
Ellen	Heine	ellen.l.heine@xcelenergy.com	Xcel Energy	414 Nicollet Mall, MP-8  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-191_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA	200 South Sixth St Ste 400  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-191_Official CC Service List
Brian	Kolbinger	brian@beckertownship.org	Becker Township Board	PO Box 248 12165 Hancock St Becker, MN 55308	Electronic Service	No	OFF_SL_21-191_Official CC Service List
Gretel	Lee	gllee@flaherty-hood.com	Flaherty & Hood, P.A.	525 Park Street Suite 470 SAINT PAUL, MN 55103	Electronic Service	No	OFF_SL_21-191_Official CC Service List
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-191_Official CC Service List
Judge Kimberly	Middendorf	kimberly.middendorf@state.mn.us	Office of Administrative Hearings	PO Box 64620  Saint Paul, MN 55164-0620	Electronic Service	Yes	OFF_SL_21-191_Official CC Service List
Marie	Pflipsen	mpflipsen@ci.becker.mn.us	City of Becker	12060 Sherburne Avenue PO BOX 250 Becker, Minnesota 55308	Electronic Service	No	OFF_SL_21-191_Official CC Service List
Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road  St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_21-191_Official CC Service List
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_21-191_Official CC Service List
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Melissa	Schmit	melissa@nationalgridrenewables.com	National Grid Renewables	8400 Normandale Lake Blvd Ste 1200  Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-191_Official CC Service List
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_21-191_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_21-191_Official CC Service List
William	Storm	bill.storm@state.mn.us	Department of Commerce	Room 500 85 7th Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_21-191_Official CC Service List
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-191_Official CC Service List
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-191_Official CC Service List