

**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

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Joseph Sullivan	Vice-Chair
Valerie Means	Commissioner
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In the Matter of Xcel Energy’s Petition for
Approval of the Sherco Solar Project

DOCKET NO. E-002/M-20-891

**COMMENTS OF THE OFFICE OF
THE ATTORNEY GENERAL**

INTRODUCTION

The Office of the Attorney General – Residential Utilities Division (“OAG”) respectfully submits these Comments in response to the Commission’s April 16, 2021 Notice of Comment Period regarding the petition of Northern States Power Company d/b/a Xcel Energy (“Xcel” or “Company”) for approval of the Sherco Solar Project (“the Project”). In its Notice, the Commission requests comments on (1) whether the Project requires a certificate of need and (2) whether the Commission has sufficient information to evaluate the Project.

For the reasons explained below, the Sherco Solar Project requires a certificate of need and does not qualify for any exceptions to that requirement. Accordingly, the Commission should require Xcel to seek a certificate of need if it wishes to continue with the Project. But even if the need for the Project were established, the current record is not adequate to evaluate the Project’s reasonableness compared to alternatives. Therefore, if the Commission disagrees with the OAG’s certificate-of-need analysis, it should protect ratepayers by requiring a new procurement process that ensures robust competition and a complete record on which to evaluate the Project’s cost.

ANALYSIS

I. THE SHERCO SOLAR PROJECT REQUIRES A CERTIFICATE OF NEED.

The OAG previously argued that the Sherco Solar Project requires a certificate of need.¹ The Project is a 460 megawatt (“MW”) solar photovoltaic facility proposed to be located near Xcel’s existing Sherburne County (“Sherco”) generating station and to go into service in 2024. Because it would have a capacity greater than 50 MW, the Project would be a “large energy facility.”² No large energy facility can be sited or constructed in Minnesota unless the Commission issues a certificate of need for the facility.³ Therefore, Xcel must obtain a certificate of need for the Project before siting or constructing it.

Xcel has identified two statutory exceptions to the certificate-of-need requirement for which it believes the Project qualifies.⁴ Neither exception, however, applies to the Project. First, Xcel argues that the Sherco Solar Project will be used to meet the Company’s Renewable Energy Standard obligations.⁵ But as the OAG previously explained, Xcel already has a significant supply of solar resources well in excess of its Renewable Energy Standard requirements.⁶

Second, Xcel argues that the Sherco Solar Project does not require a certificate of need because the Company is acquiring the Project through the “modified Track 2” bidding process

¹ See *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota’s Economic Recovery from the COVID-19 Pandemic*, Docket No. E,G-999/CI-20-492, OAG Reply Comments at 5–11 (Oct. 30, 2020). The OAG incorporates those arguments herein by reference.

² A large energy facility is “any electric power generating plant or combination of plants at a single site with a combined capacity of 50,000 kilowatts or more” Minn. Stat. § 216B.2421, subd. 2(1).

³ See Minn. Stat. § 216B.243, subd. 2 (“No large energy facility shall be sited or constructed in Minnesota without the issuance of a certificate of need by the commission”).

⁴ See Docket No. E,G-999/CI-20-492, Xcel Comments at 10–11 (Oct. 16, 2020); Docket No. E-002/M-20-891, Petition for Approval of the Acquisition of Solar Generation at Xcel Energy’s Sherburne County Site at 40–42 (Apr. 12, 2021) (hereinafter “Xcel Petition”).

⁵ See Minn. Stat. § 216B.243, subd. 9 (stating that certificate-of-need statute “does not apply to a wind energy conversion system or a solar electric generation facility that is intended to be used to meet the obligations of section 216B.1691 . . .”).

⁶ Docket No. E,G-999/CI-20-492, OAG Reply Comments at 7–9.

approved in its last integrated resource plan (“IRP”) proceeding.⁷ As the OAG previously explained, however, the Commission’s IRP order did not approve a bidding process for solar additions with in-service dates after 2021.⁸ The Commission, instead, identified a need for “approximately 750 MW of intermediate capacity” in 2026 and authorized Xcel to “file a petition for a certificate of need” to address it.⁹

A certificate of need is not merely a legal requirement; it fulfils an important ratepayer-protection function. Acquiring resources of the wrong size or type—or even the right size and type too soon—would harm ratepayers by requiring them to pay for a suboptimal resource mix. A certificate of need helps ensure that this does not happen by requiring a utility to show that it needs the resource to provide reliable service to ratepayers. In seeking approval of a large energy facility for which it has not yet established any need, Xcel is asking the Commission to put the cart before the horse. The Commission should instead protect ratepayers by directing the Company to pursue a certificate of need for the Sherco Solar Project, consistent with the Commission’s IRP order.

II. THE RECORD LACKS SUFFICIENT INFORMATION TO EVALUATE THE PROJECT.

Even if Xcel had established a need for 460 MW of new solar generation in 2024, there is insufficient information in this record to evaluate the Sherco Solar Project. There are at least two reasons for this. First, contrary to the normal Track 2 bidding process, Xcel artificially constrained competition by limiting eligible proposals to build–transfer projects located at the Sherco site.¹⁰ Second, and likely because of this limitation, the Company received too few bids to ensure that

⁷ See Minn. Stat. § 216B.2422, subd. 5(a) (stating that utility “may select resources to meet its projected energy demand through a bidding process approved or established by the commission” in a resource-planning proceeding).

⁸ See Docket No. E,G-999/CI-20-492, OAG Reply Comments at 10 n.31. The Commission approved a bidding process “for the limited purpose of acquiring wind and solar resources in the 2016–2021 timeframe.” *In the Matter of Xcel Energy’s 2016–2030 Integrated Resource Plan*, Docket No. E-002/RP-15-21, Order Approving Plan with Modifications and Establishing Requirements for Future Resource Plan Filings at 8 (Jan. 11, 2017) (hereinafter “IRP order”). The Sherco Solar Project’s Q4 2024 in-service date is well outside this timeframe.

⁹ IRP order at 11.

¹⁰ Xcel Petition at 32.

the winning proposal was competitively priced. For these reasons, if the Commission determines that the Project is needed, it should direct Xcel to undertake a new solar solicitation with additional conditions designed to ensure a truly competitive result.

A. Xcel Artificially Limited Competition, Contrary to Standard Practice.

The first reason the record is incomplete is that Xcel's request for proposals ("RFP") limited bids to "build-transfer" projects interconnecting at the Sherco site.¹¹ One effect of this limitation was that it prevented participants from submitting power purchase agreement ("PPA") proposals. PPAs—as compared to utility-owned generation—benefit ratepayers because they reduce costs in the early years of a project, limit operational risks, and can often reduce overall ratepayer cost. Including PPA proposals in a solicitation thus protects ratepayers by requiring utility self-build proposals and build-transfer proposals to compete against PPAs.¹²

In this case, however, Xcel limited competing proposals to projects interconnecting near the existing Sherco plant, to be built by Xcel or transferred to the Company.¹³ Not only did this foreclose PPA proposals, but it also foreclosed build-transfer proposals at locations other than Sherco. Xcel states that projects needed to interconnect near the Sherco plant, and be owned by Xcel, to take advantage of the Company's valuable interconnection rights at the Sherco site. The OAG does not dispute that interconnection rights have value. But by preventing other owners and locations from even being considered, Xcel arbitrarily limited competition and prevented the Commission from understanding the market price of large-scale solar.

¹¹ "Build-transfer" denotes a project whose ownership is transferred to the utility once the project is complete.

¹² See also *In the Matter of Xcel Energy's Application for Approval of Its 2004 Resource Plan*, Docket No. E-002/RP-04-1752, Order Establishing Resource Acquisition Process, Establishing Bidding Process Under Minn. Stat. § 216B.2422, Subd. 5, and Requiring Compliance Filing at 6 (May 31, 2006) ("The purpose of the competitive process—getting the best overall price for ratepayers—cannot be achieved without robust competition.").

¹³ Xcel Petition, attach. B at 6 (RFP evaluation).

The Company, in other words, is asking the Commission to simply assume that its interconnection rights make the Sherco site preferable to any other possible location. Once again, Xcel has gotten the process backwards. The purpose of an RFP is to compare competing proposals on their merits; but by artificially constraining the types of projects that could be considered, the Company put its thumb on the scale in a way that favored its own proposal. Put differently, if Xcel's interconnection rights are as valuable as Xcel suggests, its proposal would naturally "win" a competitive-bidding process. But Xcel prevented that process altogether, essentially claiming that it was not necessary because its bid *would have* won. Approving the Sherco Solar Project based on this flawed RFP process would not be in the public interest.

B. Xcel Received Too Few Bids to Ensure a Competitive Price.

The record is incomplete for a second, related reason: Xcel's RFP garnered too few competing bids to establish that the Sherco Solar Project's price is reasonable.

Xcel's RFP elicited only two competing proposals. The first was almost immediately eliminated because it was incomplete.¹⁴ The second bid was eliminated in the initial evaluation phase because it was "unable to show a clear path to site control for the Project or the generator tie line to interconnect the Project to the Sherburne County Substation, and also did not have a complete preliminary technical design."¹⁵ Despite its own proposal being the only one left, Xcel resolutely proceeded to score the proposal to aid in determining "which project or projects to pursue further."¹⁶ After scoring its own proposal, Xcel "shortlisted" it.¹⁷ Finally, Xcel selected its own proposal from the shortlist and brought it forward for approval.¹⁸

¹⁴ Xcel Petition at 33–34 & n.26.

¹⁵ *Id.* at 34.

¹⁶ *Id.*

¹⁷ *Id.* at 35.

¹⁸ *Id.*

The underwhelming response to Xcel's RFP stands in stark contrast to competitive procurements by other Minnesota utilities. For example, in August 2016, Minnesota Power issued an RFP for up to 300 MW of solar generation. In response, the utility received 83 proposals from 26 developers.¹⁹ While an RFP need not garner this much interest to yield a meaningful process, the Commission should not accept a utility's "going through the motions" of competitive procurement as a substitute for actual competition.

Finally, the subdued RFP response in this case was exacerbated by Xcel's apparent lack of a contingency plan to address a failed bidding process. The Commission's last IRP order required Xcel to "file a contingency plan early in [any Track 2 bidding] process . . . to address the potential for the bidding process to fail."²⁰ The Commission did not define a "failed" bidding process, but the clear purpose of this order point is to address a situation where the Company receives insufficient qualifying bids to instill confidence in the result. That is exactly the case here, where the *only* bid that Xcel did not reject was its own.

Given that the purpose of an RFP is to foster robust competition, it is impossible to view Xcel's RFP in this case as a success. Yet the Company never had a contingency plan to address a failed bidding process. Rather than making a contingency plan or simply redoing the solicitation, Xcel opted to charge ahead with an insufficiently vetted proposal. By doing so, however, the Company has created a record on which it *cannot* establish the reasonableness of its own proposal.

CONCLUSION

The OAG supports acquiring renewable generation in a responsible way that maximizes the benefits to all Minnesotans while minimizing the cost to ratepayers. But this cannot be

¹⁹ See Docket No. E-015/M-20-828, Minnesota Power Response to PUC Information Request No. 1 (Jan. 12, 2021) (attaching public and trade-secret versions of July 10, 2017 Independent Evaluation Report for Minnesota Power Company's 2016 Solar Resource Solicitation).

²⁰ IRP order at 11.

accomplished by short-cutting standard regulatory processes designed to protect ratepayers. For the reasons explained above, the Commission should require Xcel to seek a certificate of need for the Sherco Solar Project. Failing that, the Commission should direct the Company to conduct a new competitive procurement under the following conditions:

- The competitive-bidding process shall include a request for proposals that is posted publicly and open to any interested developer.
- The request for proposals shall not include geographic limitations.
- The request for proposals shall be open to power purchase agreements, build-transfer proposals, and utility self-build projects.
- Xcel's proposed bidding process, timeline, evaluation criteria, and request for proposals language shall be filed with the Commission at least one month prior to the issuance of the request for proposals. This filing shall also include a contingency plan describing the subsequent process should the bidding process fail to elicit a meaningful number of bids.

Dated: April 30, 2021

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

/s/ **Peter G. Scholtz**

PETER G. SCHOLTZ
Assistant Attorney General
Atty. Reg. No. 0389936

445 Minnesota Street, Suite 1400
St. Paul, Minnesota 55101-2131
(651) 757-1473 (Voice)
(651) 296-9663 (Fax)
peter.scholtz@ag.state.mn.us

ATTORNEYS FOR OFFICE OF
THE ATTORNEY GENERAL—
RESIDENTIAL UTILITIES DIVISION



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Minnesota Attorney General Keith Ellison
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April 30, 2021

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

Re: *In the Matter of Xcel Energy's Petition for Approval of the Sherco Solar Project*
MPUC Docket No. E-002/M-20-20-891

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ **Peter G. Scholtz**

PETER G. SCHOLTZ

Assistant Attorney General

(651) 757-1473 (Voice)

(651) 296-9663 (Fax)

peter.scholtz@ag.state.mn.us

CERTIFICATE OF SERVICE

Re: *In the Matter of Xcel Energy's Petition for Approval of the Sherco Solar Project*
MPUC Docket No. E-002/M-20-20-891

I, JUDY SIGAL, hereby certify that on the 30th day of April, 2021, I e-filed with eDockets *Comments of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal
JUDY SIGAL

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_20-891_M-20-891
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_20-891_M-20-891
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-891_M-20-891
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_20-891_M-20-891
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-891_M-20-891
Gabriel	Chan	gabechan@umn.edu	University of Minnesota Center	130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, Minnesota 55455	Electronic Service	No	OFF_SL_20-891_M-20-891
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-891_M-20-891
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_20-891_M-20-891

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-891_M-20-891
Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-891_M-20-891
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
Brooke	Cooper	bcooper@allate.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-891_M-20-891
Hillary	Creurer	hcreurer@allate.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_20-891_M-20-891
George	Crocker	gwilc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-891_M-20-891
Bridget	Dockter	Bridget.Dockter@xcenergy.com		N/A	Electronic Service	No	OFF_SL_20-891_M-20-891
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_20-891_M-20-891
Michelle	Dreier	mdreier@electricalassociation.com		N/A	Electronic Service	No	OFF_SL_20-891_M-20-891
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_20-891_M-20-891

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ron	Elwood	relwood@mrilsap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_20-891_M-20-891
James C.	Erickson	jerricksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_20-891_M-20-891
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_20-891_M-20-891
Eric	Fehlhaber	efeihhaber@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-891_M-20-891
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_20-891_M-20-891
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_20-891_M-20-891
Daryl	Fuentes	energy@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_20-891_M-20-891
Brian	Gardow	bgardow@greatermnigas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-891_M-20-891
James	Garness	james.r.garness@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-891_M-20-891
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_20-891_M-20-891

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_20-891_M-20-891
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-891_M-20-891
Anita	Grace	anita@gracemulticultural.com	GRACE Multicultural	12959 196th LN NW Elk River, MN 55330	Electronic Service	No	OFF_SL_20-891_M-20-891
Bill	Grant	bilgrant@minncap.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Dr Ste 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_20-891_M-20-891
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-891_M-20-891
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-891_M-20-891
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_20-891_M-20-891
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_20-891_M-20-891
Michael	Hoppe	lu23@lbew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-891_M-20-891
MJ	Horner	mj.horner@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-891_M-20-891

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-891_M-20-891
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4 h St Bismarck, ND 58501	Electronic Service	No	OFF_SL_20-891_M-20-891
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_20-891_M-20-891
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council	310 McKinzie St Mankato, MN 56001	Electronic Service	No	OFF_SL_20-891_M-20-891
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_20-891_M-20-891
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_20-891_M-20-891
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Fairbault, MN 55021	Electronic Service	No	OFF_SL_20-891_M-20-891

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-891_M-20-891
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-891_M-20-891
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-891_M-20-891
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-891_M-20-891
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-891_M-20-891
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-891_M-20-891
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7 h St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-891_M-20-891
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_20-891_M-20-891
Stacy	Miller	stacy.miller@minneapolisn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-891_M-20-891
David	Moeller	dmoeller@allstate.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-891_M-20-891
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
Samantha	Norris	saman.hanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_20-891_M-20-891
Nate	O'Reilly	nate@iron512.com	Ironworkers Local #512	851 Pierce Butler Route St Paul, MN 55104	Electronic Service	No	OFF_SL_20-891_M-20-891
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-891_M-20-891
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-891_M-20-891
John	Pacheco	johnpachecojr@gmail.com		N/A	Electronic Service	No	OFF_SL_20-891_M-20-891

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Palmer	gpalmer@greatermnogas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Fairbault, MN 55021	Electronic Service	No	OFF_SL_20-891_M-20-891
Ben	Passer	Passer@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-891_M-20-891
Jose	Perez	jose@hispanicsinenergy.com		1017 L Street #719 Sacramento, CA 95814	Electronic Service	No	OFF_SL_20-891_M-20-891
Jennifer	Peterson	jipeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-891_M-20-891
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-891_M-20-891
Kevin	Pranis	kpranis@liunagroc.com	Labors' District Council of MN and ND	81 E Little Canada Road St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_20-891_M-20-891
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_20-891_M-20-891
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_20-891_M-20-891
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-891_M-20-891
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_20-891_M-20-891

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-891_M-20-891
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-891_M-20-891
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
Kevin	Schwain	Kevin.D.Schwain@xcelenergy.com	Xcel Energy	404 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-891_M-20-891
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-891_M-20-891
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_20-891_M-20-891
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-891_M-20-891
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
Jamez	Staples	jstaples@renewablepartners.com	Renewable Energy Partners	3033 Excelsior Blvd S Minneapolis, MN 55416	Electronic Service	No	OFF_SL_20-891_M-20-891

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-891_M-20-891
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-891_M-20-891
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-891_M-20-891
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_20-891_M-20-891
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-891_M-20-891
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_20-891_M-20-891

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Analeisha	Vang	avang@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-891_M-20-891
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_20-891_M-20-891
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_20-891_M-20-891
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_M-20-891