



414 Nicollet Mall  
Minneapolis, MN 55401

August 23, 2022

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

—Via Electronic Filing—

RE: REPLY COMMENTS  
SUPPLEMENTAL FILING - SHERCO SOLAR PROJECT  
DOCKET NO. E002/M-20-891

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) this Reply to parties' August 17, 2022 Comments on our July 27, 2022 Supplemental Filing regarding our proposed 460 MW Sherco Solar Project (Project) in the above-noted docket.

We appreciate Parties' comments in support of the Project and their help to keep this project on track. In this letter, we confirm we support the Department of Commerce's (Department) additional customer protections and reporting recommendations and respond to the Office of the Attorney General's (OAG) proposals. We also provide an update on the Inflation Reduction Act passage and its anticipated impact on the Project.

**A. We Agree to the Department's Recommendations**

We appreciate the Department's support of this project and partnership to keep the project on track. The Department proposed additional customer protections and reporting requirements. We share the Department's desire to protect customers and ensure robust reporting, and we support the Department's recommendations. We have reflected these additions to the customer protection conditions below.

## **B. The OAG's Modifications are Overly Complex and Not Necessary**

In its August 17, 2022 Comments, the OAG proposed two modifications to the customer protection conditions provided in our July 27, 2022 Supplemental Filing.

First, the OAG suggested revising the conditions to be based on 260 MW of potential projects interconnecting at Sherco rather than 300 MW, as agreed to by the Company and Department.

We acknowledge that the Commission specifically approved the acquisition of 720 MW of Company-owned solar interconnecting at Sherco by 2026 in Order Point 2.a.5 of its IRP Order,<sup>1</sup> which is 260 MW more than Sherco Solar's capacity. That said, the customer protection conditions, as proposed, reflect our recently issued RFP, which seeks approximately 300 MW of resources to fill the remainder of Sherco 2's interconnection. Because the conditions are designed to ensure that Sherco Solar would have been selected as a project in the RFP, we believe this is the appropriate benchmark. We recognize, however, that there could be some confusion as to why we would seek (and potentially select) more resources in the RFP than specifically identified in Order Point 2.a.5 of the IRP Order, and we discuss that below.

We intentionally sought somewhat more capacity than the minimum we must acquire to preserve interconnection rights for a number of reasons. First, projects will often be adjusted when going through site permitting and construction processes, and thus requesting slightly more than the amount we need to fulfill the interconnection provides insurance against such potential size and scope modifications, or in the event an individual project we select in the upcoming RFP does not materialize as expected. Further, seeking an additional 40 MW is appropriately conservative to protect customer interests; oversizing the resources fulfilling the interconnection by 40 MW amounts to approximately five percent of the overall size of the interconnection, and any incremental MW can go toward the requirements for fulfilling Sherco 1's interconnection when that unit retires in 2026 (one year after the required in-service date of resources selected in the RFP). This approach is also supported by Order Point 5 of the Commission's IRP Order, which states that we shall "deploy renewable resources ... faster than in its Alternate Plan" if such deployment "would be cost-effective, maintain reliability, and aid in achieving compliance with decarbonization policies[.]"

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<sup>1</sup> ORDER APPROVING PLAN WITH MODIFICATIONS AND ESTABLISHING REQUIREMENTS FOR FUTURE FILINGS (April 15, 2022), Docket No. E002/RP-19-368 (IRP Order).

As a general matter, it is also worth noting that resource plans should not be viewed as an exact prescription of resources, rather a roadmap, given that we model based on generic assumptions that will inevitably differ in some way from realized market conditions. We have not historically procured, nor do we expect to procure, exactly every MW in precisely each year indicated in a resource plan. For instance, if a plan indicates we need 100 MW of resources in 2028, it would not be beneficial to customers for us to reject a cost-effective 105 MW project (a five percent overage, similar to that discussed above) with a COD of 2027 for being slightly larger, or slightly earlier, than generic resource modeling indicated.

Second, the OAG proposed that the cost cap be based on the lower of the dollar *per kWh* [instead of *per kW*] cost of the revised Project pricing from our July 27, 2022 Supplemental Filing, or the highest-price completed project selected in the RFP. OAG recommends this change to “allow the Commission to compare Sherco Solar to PPAs, and potentially allow a PPA to set the cost cap,” which we understand to be grounded in the fact that power purchase agreement (PPA) pricing for renewable resources often is done on an energy-production (kWh) basis. We disagree with this recommendation; the per-kW price is the best basis for this cost cap for two main reasons, which we outline below.

First, we note that PPA projects cannot fulfill the interconnection reuse plans at Sherco, due to restrictions on transferring interconnection rights, and the Commission has, therefore, approved Company ownership of the resources needed to fulfill the interconnection. In other words, in the current RFP, we are appropriately seeking and expecting specific bids for Company-owned projects interconnecting at Sherco that will be the best comparison point for the Sherco Solar project.

Further, while PPA prices may be comparable to Company-owned projects for project selection in an RFP, they are not directly comparable for purposes of a capital rider cost cap. The full cost of (and therefore revenue required to support) a third party-owned project is not transparent to the Company or the Commission. PPAs are routinely proposed for time periods that are shorter than the full life of a project, depending on the owner’s particular strategy and internal rate of return targets. The dollar-per-MWh (or kWh) price of the PPA may reflect the owner’s full revenue requirement over the life of the system, or it may be something higher or lower than the full LCOE of the project depending on the project owner’s bidding strategy and assumptions regarding residual value of the asset after the PPA term expires. For these reasons, a dollar-per-MWh figure from PPA bids are not directly comparable to projects the Company will own, and there is no way for the Company, nor the Commission, to compel the owners of PPA projects to divulge their full assumed costs, internal rate of return, and realized tax credit benefits. Thus, for purposes of

calculating a capital cost cap, comparing PPA pricing directly to projects the Company will own – where the full revenue requirement, including the Company’s allowed rate of return, is transparent – is not appropriate.

Second, a per-kW price cap is a straightforward and final comparison point that is fully aligned to how the cost of Sherco will be recovered from customers in rates. While a project’s realized net capacity factor is an important measure of its efficiency, it is not static and therefore a per-kWh cost is subject to change based on weather and other factors. As a result, using per-kWh numbers for calculating the cap would either result in a moving target (to be compared to a changing revenue requirement for the project based on depreciation and other factors) or require assumptions of project efficiency and other attributes that may or may not be completely accurate to derive a per-kW number to actually use for the cap. How such assumptions would be considered, moreover, is itself unclear. For example, the value of tax credits third-party owners are able to capture will be factored into their PPA offers, whereas for an owned project like Sherco Solar, those benefits would flow back to customers’ bills but not factor directly into the total capital cost of the project, for purposes of rate recovery. As a result, deriving a per-kW cost cap for Sherco Solar based on a PPA’s delivered per kWh price would be unnecessarily complicated. The OAG has not explained how such a cap could reasonably be implemented nor do we see how or why that should be done, particularly when the RFP is specifically seeking bids for resources that can be used as appropriate comparison points on a per-kW basis.

Moreover, to the extent the OAG is concerned about the Sherco Solar project’s assumptions regarding efficiency, we note that one of the additional customer protections proposed by the Department, which we support, provides a sufficient backstop should Sherco Solar generation be consistently lower than anticipated. The provision ensures customers are “protected from risks associated with the non-deliverability of accredited capacity and/or energy from the proposed Project, other than non-deliverability caused by weather.”<sup>2</sup>

### **C. Inflation Reduction Act and Anticipated Customer Savings**

As we have discussed elsewhere in this Docket, one significant advantage of Company owned projects is our ability and willingness to pass on any applicable benefits from changing tax reform to our customers, which the Company demonstrated with our recently completed Dakota Range wind project. Indeed, since our most recent filing in

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<sup>2</sup> This condition was included as Part C of the Department’s August 17, 2022 Comments; we include it as part 1.e in the conditions listed below.

this docket, President Biden signed into law the Inflation Reduction Act of 2022 (IRA), which includes important tax changes to spur U.S. clean energy production. We, along with the rest of the industry, continue to analyze impacts of the legislation, but believe it will lead to significant savings for our customers. Specific to Sherco Solar, we currently estimate that passage of the IRA could lead to incremental customer savings of 20 percent or more compared to estimates provided in our July 27, 2022 Supplemental Filing.

There are several components in the IRA that will require estimation, interpretation, and further guidance from the Internal Revenue Service (IRS) to refine our estimate of the economic impact on the Project. For example, a particularly important component is the ability to transfer/sell tax credits to third parties. This will require the development of a new market to facilitate these transactions. The cost to transact will be determined by several factors including market conditions and transaction structure. We will better understand the cost as the market develops, but we expect the cost to be relatively small compared to the value of the credits and the overall benefits to our customers.

Other factors in the IRA that need further review and clarification include eligibility requirements to qualify for the full credit including prevailing wage and apprenticeship provisions, and requirements to qualify for bonus credits including “energy community” and “domestic content” provisions as defined in the IRA. There is also uncertainty in the language surrounding the inflation adjustment factor and the resulting Production Tax Credit (PTC) value for credits beginning in 2022. Guidance on these and other details of the IRA will help us to refine the expected impact on the Project.

As previously committed to in this docket, we will pass all applicable tax benefits to our customers. We will work to determine the precise impact of the IRA on this project in the coming months as additional guidance is provided by the IRS, but overall, we expect the passage of the IRA will provide significant benefits to our customers in a lower LCOE for the Sherco Solar Project. We will provide the final price impact as well as the potential RFP cost cap comparison in a future quarterly project compliance filing recommended by the Department.<sup>3</sup>

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<sup>3</sup> The final cost cap comparison may not be known for several years until the RFP projects are built and in service.

## CONCLUSION

Considering the many Project benefits and broad stakeholder support, we continue to request that the Commission approve the Sherco Solar Project no later than September 15, 2022 to ensure that construction activities can begin on the Project yet this year, and we can remain on track to fully reuse the Sherco 2 interconnection rights to the benefit of our customers and communities.

Specifically, we ask the Commission to:

1. Approve the Company's acquisition and construction of the 460 MW Sherco Solar Project subject to the following conditions:
  - a. If the forthcoming RFP does not result in sufficient projects to meet the need identified in Order Point 2.a.5 of the IRP Order without also constructing Sherco Solar (in other words, if less than 300 MW of company-owned projects interconnecting at Sherco and an additional 600 MW of solar resources unconstrained by interconnection location or ownership pass through both the completeness and threshold reviews of the RFP, excluding those that are not selected for shortlisting by the Company due to factors outside the Company's control (e.g., the bidder opts to sell the project or energy from the project to a different party)), such that Sherco Solar would have been selected in the RFP were it to be bid in, then rider recovery for Sherco Solar is capped at the revised pricing discussed in the Company's July 27, 2022 filing.
  - b. If the forthcoming RFP results in sufficient projects to meet the need identified in Order Point 2.a.5 of the IRP Order without also constructing Sherco Solar (in other words, if 300 MW or more of company-owned projects interconnecting at Sherco and 600 MW or more of additional projects unconstrained by interconnection location or ownership pass through both the completeness and threshold reviews of the RFP, excluding those that are not selected for shortlisting by the Company due to factors outside the Company's control), then rider recovery for Sherco Solar is capped at the lower of the dollar per kW of (1) the revised pricing discussed in the Company's July 27, 2022 filing or (2) the highest-priced completed project selected in the RFP (meaning, on time, all proposed MW, using union labor), thereby ensuring customers

only pay costs for Sherco Solar at an amount that would have been selected in the RFP.

- c. Xcel Energy must justify any costs (including operations and management expense, ongoing capital expense – including revenue requirements related to capital included in rate base – insurance expense, land-lease expense, and property/production tax expense) that are higher than forecasted in this proceeding.
  - d. Ratepayers will not be put at risk for any assumed benefits that do not materialize.
  - e. Xcel Energy customers must be protected from risks associated with the non-deliverability of accredited capacity and/or energy from the proposed Project, other than non-deliverability caused by weather. The Commission may adjust Xcel Energy's recovery of costs associated with this proposed Project in the future if actual production varies significantly from assumed production over an extended period, for reasons other than those related to weather.
  - f. The Company must report in its fuel clause filing and annual automatic adjustment filings the amount of any curtailment payments, along with explanations for the curtailments, for the proposed Project.
  - g. The Company must clearly account for all costs incurred for the proposed Project.
  - h. The Company must report quarterly, until the proposed Project is in service, project failures along with the options available to the Commission to remedy any failures that occur.
  - i. Report on how the proposed Project as built is consistent with the information requested in the May 20, 2020, notice issued in Docket No. E,G-999/CI-20-492.
2. Authorize the Company to recover costs of the Project through the RES Rider, with future cost recovery limited to the Minnesota jurisdictional allocators approved by the Commission.

We thank the Commission for its time with and consideration of this transformational project for our customers, and for all of Minnesota.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact me at [bria.e.shea@xcelenergy.com](mailto:bria.e.shea@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA  
REGIONAL VICE PRESIDENT, REGULATORY POLICY

c: Service List



## CERTIFICATE OF SERVICE

I, Christine Schwartz, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

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

xx electronic filing

**Docket No.            E002/M-20-891**

Dated this 23<sup>rd</sup> day of August 2022

/s/

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Christine Schwartz

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_Official
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_Official
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	OFF_SL_20-891_Official
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_Official
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_Official
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_Official
Gabriel	Chan	gabechan@umn.edu	University of Minnesota	130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, Minnesota 55455	Electronic Service	No	OFF_SL_20-891_Official
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_Official
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_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-891_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_20-891_Official
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_Official
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-891_Official
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-891_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-891_Official
Bridget	Dockter	Bridget.Dockter@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-891_Official
Michelle	Dreier	mdreier@electricalassociation.com		N/A	Electronic Service	No	OFF_SL_20-891_Official
Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters	700 Olive Street  St. Paul, MN 55130	Electronic Service	No	OFF_SL_20-891_Official
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_Official
Ron	Elwood	relwood@mnlsap.org	Legal Services Advocacy Project	970 Raymond Avenue Suite G-40 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_20-891_Official
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St  Superior, WI 54880-4421	Electronic Service	No	OFF_SL_20-891_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_Official
Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_20-891_Official
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_Official
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E  Little Canada, MN 55117	Electronic Service	No	OFF_SL_20-891_Official
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St  Chicago, IL 60661	Electronic Service	No	OFF_SL_20-891_Official
James	Garness	james.r.garness@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-891_Official
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_20-891_Official
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_20-891_Official
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_Official
Anita	Grace	anita@gracemulticultural.com	GRACE Multicultural	12959 196th LN NW  Elk River, MN 55330	Electronic Service	No	OFF_SL_20-891_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bill	Grant	billgrant@minncap.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Dr Ste 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_20-891_Official
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_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_20-891_Official
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-891_Official
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street  Farmington, MN 550249583	Electronic Service	No	OFF_SL_20-891_Official
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-891_Official
MJ	Horner	mj.horner@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-891_Official
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-891_Official
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St  Bismarck, ND 58501	Electronic Service	No	OFF_SL_20-891_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave.  Marathon, FL 33050	Electronic Service	No	OFF_SL_20-891_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_Official
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_Official
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-891_Official
Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council	310 McKinzie St  Mankato, MN 56001	Electronic Service	No	OFF_SL_20-891_Official
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_Official
Brian	Kolbinger	brian@beckertownship.org	Becker Township Board	PO Box 248 12165 Hancock St Becker, MN 55308	Electronic Service	No	OFF_SL_20-891_Official
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_Official
Nicolle	Kupser	nkupser@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_Official
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_Official
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_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_Official
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_Official
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-891_Official
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_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-891_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_Official
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_Official
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-891_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-891_Official
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_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_Official
Samantha	Norris	samanthanorris@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_Official
Nate	O'Reilly	nate@iron512.com	Ironworkers Local #512	851 Pierce Butler Route  St Paul, MN 55104	Electronic Service	No	OFF_SL_20-891_Official
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-891_Official
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-891_Official
John	Pacheco	johnpachecojr@gmail.com		N/A	Electronic Service	No	OFF_SL_20-891_Official
Greg	Palmer	gpalmer@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_Official
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560  Minneapolis, Minnesota 55401	Electronic Service	No	OFF_SL_20-891_Official
Jose	Perez	jose@hispanicsinenergy.com	Hispanics in Energy	1017 L Street #719  Sacramento, CA 95814	Electronic Service	No	OFF_SL_20-891_Official
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-891_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-891_Official
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_20-891_Official
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_20-891_Official
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_Official
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_Official
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_Official
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_20-891_Official
Nathaniel	Runke	nrunke@local49.org		611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_20-891_Official
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_Official
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_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_20-891_Official
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_20-891_Official
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_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_20-891_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_Official
Jamez	Staples	jstaples@renewablepartners.com	Renewable Energy Partners	3033 Excelsior Blvd S Minneapolis, MN 55416	Electronic Service	No	OFF_SL_20-891_Official
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_Official
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_Official
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_Official
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-891_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_Official
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_Official
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_Official
Analeisha	Vang	avang@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-891_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_20-891_Official
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_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_Official
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-891_Official