

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Valerie Means
Matthew Schuerger
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

Jeremy P. Duehr
Fredrikson and Byron, P.A.
200 South Sixth Street, Suite 4000
Minneapolis, MN, 55402-1425

SERVICE DATE: January 4, 2022

DOCKET NO. IP-7070/CN-21-791

In the Matter of the Petition for Exemption from Certain Certificate of Need Application Content Requirements for the Application of Lake Wilson Solar Energy LLC for a Certificate of Need for an up to 150 MW Lake Wilson Solar and Associated Battery Storage Project in Murray County, Minnesota

The above entitled matter has been considered by the Commission and the following disposition made:

- 1. The Department recommends that the Commission approve the following exemptions conditioned upon Lake Wilson providing alternative data:**
 - **7849.0250 (C) 7: Effect of Project on Rates System-wide;**
 - **7849.0250 (D): Map of Applicant's System;**
 - **7849.0270: Peak Demand and Annual Consumption Forecast;**
 - **7849.0280: System Capacity;**
 - **7849.0300: Consequences of Delay—System; and**
 - **7849.0340: The Alternative of No Facility.**
- 2. The Department recommends that the Commission approve the following exemptions as proposed:**
 - **7849.0240, subp. 2 (B): Promotional Activities;**
 - **7849.0250 (B) 1-5: Description of Certain Alternatives;**
 - **7849.0250 (C) 1 to 6, 8 and 9: Availability of Alternatives to the Facility;**
 - **7849.0290: Conservation Programs; and**
 - **7849.0330: Alternatives Involving an LHVTL.**

This decision is issued by the Commission's consent calendar subcommittee, under a delegation of authority granted under Minn. Stat. § 216A.03, subd. 8 (a). Unless a party, a participant, or a Commissioner files an objection to this decision within ten days of receiving it, it will become the Order of the full Commission under Minn. Stat. § 216A.03, subd. 8 (b).

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert
Executive Secretary



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Southwest Regional Development Commission Project Review

Agenda Item: 6

Meeting Date: December 9, 2021

Project Name: In the Matter of the Application of Lake Wilson Solar Energy LLC for a Certificate of Need for the up to 150 MW Solar and Associated Battery Storage Project in Murray County, Minnesota.

Docket Number: IP7070/CN-21-791

Project Description:

Lake Wilson Solar Energy LLC plans on filing an application for a certificate of need to construct and operate the Lake Wilson Solar Project, an up to 150-megawatt solar energy generating system with associated battery storage to be located in Chanarambie and Leeds townships, Murray County, Minnesota. The primary components of the solar facility would include photovoltaic panels affixed to a linear ground-mounted single-axis tracking system, solar modules, solar inverters, racking, fencing, access roads, an operation and maintenance building, a substation facility, an electrical collection system, weather stations, an up to 50-megawatt battery energy storage system, a short 115-kilovolt overhead transmission line, and other infrastructure typical of a solar energy generating system. The solar facility would connect to the electrical grid at the existing Northern States Power Fenton to Chanarambie 115-kilovolt transmission line.

The project's development footprint within the project area spans approximately 1,581 acres in Chanarambie and Leeds Townships. The proposed timeline would allow for an in-service date of 2024.



Staff Comments and Questions:

- Lake Wilson Solar Energy LLC is in the beginning stages of applying for a Certificate of Need. The question at this point is, "should the Commission grant the exemptions to the certificate of need application content requirements requested by Lake Wilson Solar Energy LLC in its November 16, 2021."
 - Lake Wilson Solar Energy LLC is in the beginning stages of applying for a Certificate of Need. The question at this point is, "should the Commission grant the exemptions to the certificate of need application content requirements requested by Lake Wilson Solar Energy LLC in its November 16, 2021."
- Staff does not see any issues with the exemption requests from Lake Wilson Solar Energy, LLC.
- When the Certificate of Need is submitted, staff will again review this project.

Project Review Time: 1 hour

Income to the SRDC as a result of this Review: \$0

Reviewer: Jason Walker, Development/Energy Planner

December 10, 2021

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. IP-7070/CN-21-791

Dear Mr. Seuffert:

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

Petition for Exemption from Certain Certificate of Need Application Content Requirements for the Application of Lake Wilson Solar Energy LLC for a Certificate of Need for an up to 150 MW Lake Wilson Solar and Associated Battery Storage Project in Murray County, Minnesota.

The petition was filed on behalf of Lake Wilson Solar LLC on November 16, 2021 by:

Jeremy P. Duehr
Fredrikson and Byron, P.A.
200 South Sixth Street, Suite 4000
Minneapolis, Minnesota, 55402-1425

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve the data exemption requests with conditions**. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. IP-7070/CN-21-791

I. SUMMARY OF FILING

On November 16, 2021, Lake Wilson Solar Energy LLC (Lake Wilson or the Applicant) filed the Company's *Request for Exemption from Certain Application Content Requirements* (Petition).

On November 24, 2021 the Minnesota Public Utilities Commission (Commission) issued its *Notice of Comment Period on Request for Exemption from Certain Certificate of Need Application Content Requirements* (Notice). The Notice asked: "Should the Commission grant the exemptions to the certificate of need application content requirements as requested by Lake Wilson Solar Energy LLC in its November 16, 2021, filing?"

A. PROJECT BACKGROUND

Lake Wilson is an independent power producer (IPP) that plans to construct and operate an up to 150 MW solar-energy generating system and associated battery storage at a single 3,318 acres site within Chanarambie and Leeds Townships in Murray County, Minnesota (Project). The Project would utilize solar panels affixed to tracking mechanisms that would allow the panels to track the sun throughout the day. In addition the Project would consist of associated facilities including a maintenance building, substation facility, electrical collection system, weather stations, a short 115 kV overhead transmission line, and an up to 50 MW battery energy storage. The Project proposes to interconnect to the existing Northern States Power Fenton to Chanarambie 115 kV line, which is located within the Project development footprint. Lake Wilson plans an in-service date for the project in 2024.

B. EXEMPTION REQUESTS

In the Petition, Lake Wilson requests exemption from providing data relevant to the Minnesota Rules listed below, or the data is otherwise irrelevant to the Petition:

- i. 7849.0240, subp. 2 (B);
- ii. 7849.0250 (B) 1-5;
- iii. 7849.0250 (C) 1 to 6, 8 and 9;
- iv. 7849.0250 (C) 7;
- v. 7849.0250 (D);
- vi. 7849.0270;
- vii. 7849.0280;

- viii. 7849.0290;
- ix. 7849.0300;
- x. 7849.0330; and
- xi. 7849.0340.

Lake Wilson notes that the Commission has previously granted exemption requests for these items for IPP projects.

Below are the Comments of the Department regarding the Petition.

II. DEPARTMENT ANALYSIS

A. GOVERNING STATUTE

Minnesota Statutes § 216B.243, subd. 2 states that no large energy facility (LEF) shall be constructed without a certificate of need (CN). At 280 MW, the proposed Project qualifies as an LEF. Lake Wilson's Petition requests exemption from several of the filing requirements related to a future CN application for the proposed Project.

Minnesota Rules, part 7849.0200, subp. 6 states that an exemption is appropriate if the data requirement is not necessary in order to determine the need, or can be obtained via another document:

Before submitting an application, a person is exempted from any data requirement of parts 7849.0010 to 7849.0400 if the person (1) requests an exemption from specified rules, in writing to the Commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document. A request for exemption must be filed at least 45 days before submitting an application.

The Department examines each specific exemption request separately. The criterion to be considered is whether Lake Wilson has shown that "the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document."

B. EXEMPTION ANALYSIS

1. 7849.0240, subp. 2 (B): Promotional Activities

This rule requires an applicant to provide an explanation of the relationship of the proposed facility to promotional activities that may have given rise to the demand for the facility. Lake Wilson states that

it “has not engaged in any promotional activity” and does not have retail customers. The Department notes that the Commission has granted this exemption to IPPs because these companies do not have captive retail customers.

2. 7849.0250 (B) 1-5: Description of Certain Alternatives

This rule requires an applicant to provide a discussion of the availability of alternatives to the facility, including but not limited to:

- 1) purchased power;
- 2) increased efficiency of existing facilities, including transmission lines;
- 3) new transmission lines;
- 4) new generating facilities of a different size or using a different energy source; and
- 5) any reasonable combinations of the alternatives listed in sub items (1) to (4).

Lake Wilson requests an exemption from information requirements 1, 2, 3 and 5 as they are not applicable and a partial exemption of requirement 4 such that Lake Wilson not address non-renewable alternatives. With respect to 7849.0250 (B) 4 the Department agrees with the Applicant that an exemption to the extent an alternative cannot address the need for renewable power is reasonable.

Regarding Minnesota Rules 7849.0250 (B) 1, Lake Wilson is proposing to produce power to sell to utilities in the market or other potential off-takers, and thus purchased power is not an alternative. Thus, an exemption is appropriate.

The requirements of Minnesota Rules 7849.0250 (B) 2, 3 and 5 are not applicable to Lake Wilson as the Applicant is not a vertically integrated regulated utility and therefore has no existing facilities in Minnesota for which efficiency could be improved in order to mitigate the need for the project, and does not own or plan to own transmission lines other than those needed for the interconnection of the project. Therefore, the Department recommends that the exemption be granted.

3. 7849.0250 (C) 1 to 6, 8 and 9: Availability of Alternatives to the Facility

This rule requires an applicant to provide the following information for the proposed facility and each of the alternatives provided in response to Minnesota Rules 7849.0250 (B):

- 1) capacity costs in current dollars per kilowatt;
- 2) service life;
- 3) estimated average annual availability;
- 4) fuel costs in current dollars per kilowatt hour;
- 5) variable operating and maintenance costs in current dollars per kilowatt hour;
- 6) total cost in current dollars of a kilowatt hour provided by it;

- 7) estimate of its effect on rates system wide and in Minnesota;
- 8) efficiency, expressed as the estimated heat rate; and
- 9) major assumptions made in providing the above information (e.g., escalation rates used, projected capacity factors).

Lake Wilson requests a partial exemption from this Rule to limit its discussion to only renewable alternatives, similar to their request for exemption from Minnesota Rules 7849.0250 (B). Specifically, since the intent of the project is to provide renewable energy to sell to the market, examination of non-renewable alternatives would be irrelevant.

The Department agrees that the required information—regarding non-renewable alternatives—is not relevant to analysis of alternatives to Lake Wilson’s proposed Project and that limiting the requirement to renewable alternative data will better address the proposed need. Therefore, the Department recommends that the Commission grant the proposed exemption.

4. *7849.0250 (C) 7: Effect of Project on Rates System-wide*

This rule requires an applicant to provide an estimate of the project’s effect on rates system-wide and in Minnesota, assuming a test year beginning with the proposed in-service date. Lake Wilson requests an exemption because Lake Wilson does not operate a system, is not a utility with retail rates, and has not secured a purchaser for power produced by the Project. The Commission has granted a similar exemption to other IPPs because IPPs do not have a system. Lake Wilson proposes to submit data on the Project’s impact on state or regional wholesale prices instead. Therefore, the Department recommends that the Commission grant the proposed exemption with the provision of the alternative data.

5. *7849.0250 (D): Map of Applicant’s System*

This rule requires an applicant to provide a map of the applicant’s system. Lake Wilson requests an exemption because Lake Wilson does not operate a system and thus the information does not exist. As an alternative, Lake Wilson proposes to file a map showing the site of the Project and its location relative to the power grid. The Department agrees that the proposed alternative map would contain more relevant data. Therefore, the Department recommends that the Commission approve the requested exemption with the provision of Lake Wilson’s proposed alternative data.

6. *7849.0270: Peak Demand and Annual Consumption Forecast*

This rule requires an applicant to provide system forecast data. Lake Wilson requests an exemption because it does not have a service area or a system. Because the Applicant also has not identified a buyer yet, Lake Wilson cannot reasonably forecast peak demand for the buyer’s service area. Lake Wilson proposes to submit regional demand, consumption, and capacity data to demonstrate the need

for independently produced renewable energy. The Department agrees that the Applicant's proposed alternative data is relevant. Therefore, the Department recommends that the Commission approve the requested exemption and require Lake Wilson to provide data regarding regional demand, consumption, and capacity.

7. *7849.0280: System Capacity*

This rule requires an applicant to provide information regarding the ability of its existing system to meet the demand for electrical energy forecast in response to part 7849.0270. Again, Lake Wilson does not have a system but proposes to submit regional demand, consumption and capacity data. The Department recommends that the Commission approve the requested exemption and require Lake Wilson to provide data regarding regional demand, consumption and capacity.

8. *7849.0290: Conservation Programs*

This rule requires an applicant to provide information related to conservation programs. Lake Wilson requests an exemption to this rule because Lake Wilson is not a regulated utility, has no retail customers, and plans to sell the project's output into the wholesale market. For these reasons and the fact that the Project is a renewable energy project, conservation programs could not serve as an alternative to the Project.

The Department agrees that conservation program information is not relevant to the determination of need for the Project and recommends that the Commission approve the requested exemption.

9. *7849.0300: Consequences of Delay—System*

This rule requires an applicant to provide information regarding anticipated consequences to its system, neighboring systems, and the power pool should the proposed facility be delayed one, two, and three years, or postponed indefinitely. Lake Wilson requests an exemption because the Applicant does not have a system, and requests instead to provide data on the consequences of delay to its potential customers and the region. The Department recommends that the Commission approve the requested exemption and require Lake Wilson to provide data regarding the consequences of delay on its potential customers and the region.

10. *7849.0330: Alternative Involving a Large High Voltage Transmission Line (LHVTL)*

This rule requires an applicant to provide data for each alternative that would involve construction of an LHVTL. Regarding this requirement Lake Wilson states that transmission facilities are not true alternatives to the Project as the purpose of the Project is to increase the available solar energy. Additionally, the Project intends to connect to the existing Fenton to Chanarambie 115 kV line that is owned and operated by Norther States Power in Murray County, Minnesota and any transmission line

for the Project will be short and limited in use to connecting the Project to the broader transmission system. Lake Wilson states that it does not plan to install any facilities that would be defined as an LHVTL. The Department agrees with Lake Wilson's analysis and recommends that the Commission grant the proposed exemption as the rule is not applicable.

11. 7849.0340: The Alternative of No Facility

This rule requires an applicant to provide information regarding the impact of the alternative of no facility on the existing system. Lake Wilson requests an exemption because it does not have a system. The Department recommends that the Commission approve the requested exemption and allow Lake Wilson to provide data regarding the impact on the wholesale market of the "no facility" alternative as the Applicant proposes.

III. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission approve the following exemptions conditioned upon Lake Wilson providing alternative data:

- 7849.0250 (C) 7: Effect of Project on Rates System-wide;
- 7849.0250 (D): Map of Applicant's System;
- 7849.0270: Peak Demand and Annual Consumption Forecast;
- 7849.0280: System Capacity;
- 7849.0300: Consequences of Delay—System; and
- 7849.0340: The Alternative of No Facility.

The Department recommends that the Commission approve the following exemptions as proposed:

- 7849.0240, subp. 2 (B): Promotional Activities;
- 7849.0250 (B) 1-5: Description of Certain Alternatives;
- 7849.0250 (C) 1 to 6, 8 and 9: Availability of Alternatives to the Facility;
- 7849.0290: Conservation Programs; and
- 7849.0330: Alternatives Involving an LHVTL.

December 15, 2021

VIA EDOCKETS

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
Saint Paul, MN 55101-2147

Re: **Reply Comments**
In the Matter of the Application of Lake Wilson Solar Energy LLC for a Certificate of Need for the up to 150 MW Lake Wilson Solar and Associated Battery Storage Project in Murray County, Minnesota

MPUC Docket No. IP-7070/CN-21-791

Dear Mr. Seuffert:

Lake Wilson Solar Energy LLC (“Lake Wilson Solar”) has reviewed the comments filed by the Minnesota Department of Commerce, Division of Energy Resources (“Department”) on December 10, 2021, recommending approval of Lake Wilson’s request for exemption from certain certificate of need application content requirements for the up to 150-megawatt Lake Wilson Solar and Associated Battery Storage Project located in Murray County, Minnesota (the “Project”). The Southwest Regional Development Commission (“SRDC”) also filed a comment letter on December 9, 2021 recommending approval of the exemption requests.

Lake Wilson Solar agrees with the Department’s and SRDC’s recommendations and requests that the Commission approve the data exemption requests as detailed in the Department’s comments.

A copy of this filing has also been served upon the persons on the attached Certificate of Service. Please let me know if you have any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A.

/s/ Jeremy P. Duehr

Jeremy P. Duehr

Direct Dial: 612.492.7413

Email: jduehr@fredlaw.com

JPD:blj: 74703460 v2

Enclosures

CERTIFICATE OF SERVICE

I, Robin Benson, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission ORDER

Docket Number: **IP-7070/CN-21-791**

Dated this **4th** day of **January, 2022**

/s/ Robin Benson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David	Bell	david.bell@state.mn.us	Department of Health	POB 64975 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-791_CN-21-791
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_21-791_CN-21-791
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Randall	Doneen	randall.doneen@state.mn.us	Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul, MN 55155	Electronic Service	No	OFF_SL_21-791_CN-21-791
Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.	200 South Sixth Street Suite 4000 Minneapolis, Minnesota 55402-1125	Electronic Service	Yes	OFF_SL_21-791_CN-21-791
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Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_21-791_CN-21-791
Annie	Felix Gerth	annie.felix-gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_21-791_CN-21-791

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Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA	200 South Sixth St Ste 400 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-791_CN-21-791
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Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-791_CN-21-791
Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers	180 5th St # 700 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-791_CN-21-791
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_21-791_CN-21-791
Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service	Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington, MN 55425	Electronic Service	No	OFF_SL_21-791_CN-21-791
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_21-791_CN-21-791

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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-791_CN-21-791
Jayme	Trusty	execdir@swrdc.org	SWRDC	2401 Broadway Ave #1 Slayton, MN 56172	Electronic Service	No	OFF_SL_21-791_CN-21-791
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