

February 16, 2024

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E002/CN-23-212

Dear Mr. Seuffert:

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

Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation: Completeness Review.

The Petition was filed by Bria E. Shea, Regional Vice President, Regulatory Policy, Northern States Power Company, d/b/a Xcel Energy, on January 22, 2024.

The Department recommends the Commission **declare the proposals complete upon submission of additional data**. Steve Rakow is available to answer any questions the Commission may have.

Sincerely,

/s/ LOUISE MILTICH  
Assistant Commissioner of Regulatory Analysis

SR/ar  
Attachment

## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/CN-23-212

#### I. INTRODUCTION

On April 15, 2022, the Minnesota Public Utilities Commission (Commission) issued its *Order Approving Plans with Modifications and Establishing Requirements for Future Filings* (IRP Order) in Northern States Power Company d/b/a Xcel Energy's (Xcel or the Company) 2020–2034 Integrated Resource Plan (IRP); Docket No. E002/RP-19-368.<sup>1</sup> Point 3 of the IRP Order stated that:

the Commission finds that it is more likely than not that there will be a need for approximately, but not more than, 800 MW of generic firm dispatchable resources between 2027 and 2029. In a future resource plan, Certificate of Need application, or applicable resource acquisition proceeding, Xcel shall include an evaluation of renewable resources and storage that can deliver the identified necessary grid attributes to meet the need for approximately, but not more than, 800 MW of generic firm dispatchable resources between 2027 and 2029.

Xcel's petition in the Company's current resource plan (Docket No. E002/RP-24-67) included a complete evaluation of the need for firm dispatchable resources.<sup>2</sup> Xcel's analysis included both renewable resources and energy storage as options. In addition, proposals in this proceeding also offer renewable resources and energy storage. Therefore, the Department concludes that the requirement to include an evaluation of renewable resources and storage has been met.

In subparts to Order point 3, The IRP Order defined the term "firm dispatchable" as follows:

- A. For purposes of Ordering Paragraph 3, "firm dispatchable" means a resource or combination of resources that is able to provide capacity and energy.
- B. Other characteristics for a firm dispatchable resource that may be considered include:
  - 1) energy availability to meet load for extended durations of energy in the context of the system as a whole,
  - 2) the value from production capabilities during potential system restoration events of unknown duration,
  - 3) environmental impacts,
  - 4) costs, and
  - 5) the ability to foster integration of renewable resources.

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<sup>1</sup> Available at [20224-184828-01](#)

<sup>2</sup> Available at [20242-203027-01](#)

Regarding re-verification of the need for resources, in a subpart to Order point 3, the IRP Order stated:

- C. Xcel shall analyze this likely need based on up-to-date system-wide modeling, including corrected modeling of wind fleet variability and of exchanges with MISO, in order to –
- 1) establish the capacity, energy, resource adequacy, energy availability, ancillary service, and reliability needs, and
  - 2) quantify and compare the contribution of the electric system attributes from the different resource options considered to meet the identified grid needs.<sup>3</sup>

On May 24, 2023, Xcel filed a petition requesting to initiate a resource acquisition process to acquire 800 megawatts (MW) of firm dispatchable generation per the IRP Order.<sup>4</sup>

On November 3, 2023, the Commission issued its *Order Approving Petition and Requiring Compliance Filing* (CN Order).<sup>5</sup> The CN Order approved the following schedule:

- November 13, 2023: Xcel compliance filing;
- November 22, 2023: Xcel notice published;
- January 22, 2024: Xcel and interested competitors file proposals to meet the need;
- March 28, 2024: Commission determination of completeness, referral to the Office of Administrative Hearings (OAH), if warranted;
- October 25, 2024: Administrative Law Judge's Report, if referred to OAH; and
- December 19, 2024: Commission decision on competitive process.

The CN Order at point 6 delegated authority to the Commission's Executive Secretary to modify, via notice, the established timelines, and deadlines. The CN Order also approved Xcel's Applicant Guide and Filing Requirements with modifications. Finally, the CN Order required Xcel to make a compliance filing containing the materials with the Commission's required modifications.

On November 13, 2023, Xcel filed its *Compliance Filing* showing the Applicant Guide and Filing Requirements as modified by the CN Order.

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<sup>3</sup> Xcel's 2024 resource plan petition (Docket No. E002/RP-24-67) includes a re-analysis of the likely need based on up-to-date modeling. Xcel's re-analysis concluded that the Company needed approximately 1.5 GW of firm dispatchable resources in the 2027-2028 timeframe plus 0.75 GW soon thereafter, in 2030. See Figure 4-1 of the resource plan petition: [20242-203027-01](#)

<sup>4</sup> Available at: [20235-196110-02](#)

<sup>5</sup> Available at: [202311-200215-01](#)

On January 20, 2024, proposals were filed by the following bidders:

- DESRI Renewable Energy Development, LLC, an affiliate of D. E. Shaw Renewable Investments (DESRI);
- Invenergy LLC (Invenergy);
- National Grid Renewables (NG Renewables);
- NextEra Energy Resources Development, LLC (NextEra);
- Onward Energy Holdings (Onward);
- Rondo Energy, Inc. (Rondo); and
- Xcel.

On January 26, 2024, the Commission issued its *Notice of Comment Period on the Completeness of Xcel Energy's and Alternative Bidders' Resource Proposals* (Notice). The Notice established comment periods and stated that the following topics are open for comment:

- The completeness of Xcel Energy's and alternative bidders' resource proposals under the requirements outlined in the revised Attachment C-Appendix A, filed as part of Xcel's November 13, 2023, compliance filing.
- Should the Commission refer the matter to the Office of Administrative Hearings (OAH) for contested case proceedings?
- Any other completeness or initial procedural issues that should be addressed before the review process and the evaluation of the merits begin.

On February 16, 2024 Invenergy filed supplemental information.

Below is the Department's completeness review of the bidders' resource proposals and procedural recommendation as required by the Notice.

## **II. DEPARTMENT ANALYSIS**

The Department begins by noting that these completeness comments do not reflect the Department's views on the merits of any of the proposals offered. Instead, they merely assess the presence or absence of required information. The Department expects that the various bidders will provide the information identified as missing in reply comments. The merits of the proposals that are determined by the Commission to be complete will be reviewed at a later time, after the Commission makes its completeness determination in late March.

### **A. COMPLETENESS**

The first issue listed in the Notice is "The completeness of Xcel Energy's and alternative bidders' resource proposals under the requirements outlined in the revised Attachment C-Appendix A, filed as part of Xcel's November 13, 2023, compliance filing." The results of the Department's completeness

review using Xcel's compliance filing are provided below.<sup>6</sup> Some of the information listed as missing below may not apply to the bids offered. If that is the case a simple statement to that effect in reply would be sufficient. In addition, the Department may have not seen the required information even though it is present. In that case a citation from the bidder as to where the information is located would be sufficient.

*1. DESRI*

DESRI provided a proposal for battery storage added as a surplus storage generation interconnection agreement (GIA) to an existing solar facility.<sup>7</sup> The Department did not locate the following information regarding DESRI's proposal:

1. Minn. R. 7829.2500, Sub. 2—Brief summary of filing on separate page sufficient to apprise potentially interested parties of its nature and general content;
2. Minn. R. 7849.0240 sub. 2 C—Effects of the facility in inducing future development;
3. Minn. R. 7849.0250 A (1)—Discussion of the impact of economies of scale on facility size and timing;
4. Minn. R. 7849.0320 B—Estimated amount of vehicular, rail, and barge traffic due to construction and operation;
5. Minn. R. 7849.0320 E (1), (2), and (3)—Regarding water use:
  - a. Estimated maximum use including:
    - i. Groundwater pumping rate in gallons/minute
    - ii. Surface water appropriation in cubic feet/second
  - b. Estimated groundwater appropriation in million gallons/year;
  - c. Annual consumption in acre-feet;
6. Minn. R. 7849.0320 I—Potential sources/types of audible noise;
7. Minn. R. 7849.0320 J—Estimated work force required for construction and operation;
8. IRP Order, point C 1—Planned maintenance;
9. IRP Order, point C 2— Expected minimum load;
10. 800 FD Order, Metric 32—Provide a climate change analysis of the proposal consistent with the Minnesota Environmental Quality Board's environmental assessment worksheet guidance for developing a carbon footprint and incorporating climate adaptation and resilience;<sup>8</sup>
11. 800 FD Order, Metric 32—Identifying whether the proposal is located in an environmental justice area using census criteria in Minnesota Statute 216B.1691, subd. 1(e);

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<sup>6</sup> Note that certain bidders' proposals did not include a formal cover letter per Minn. R. 7849.0200, Subp. 4. However equivalent information is available within the Bid Intake Form's Applicant Info and References tab and this was considered acceptable.

<sup>7</sup> Note that DESRI provided two variations of the proposal.

<sup>8</sup> The guidance document is located here:

<https://www.eqb.state.mn.us/sites/eqb/files/documents/2023%20EAW%20Climate%20Guidance.pdf>

12. 800 FD Order, Metric 61—Information necessary for consideration of Energy Justice factors:
  - a. Socioeconomic factors of a project's location;
  - b. Involvement of local government, community organizations and, where relevant, Tribal Nations;
  - c. Estimated local tax revenue it will produce;
  - d. The temporary and permanent jobs it will create;
  - e. The commitment to the use of diverse suppliers, as demonstrated by a history of use on recent projects; and
  - f. The payment of prevailing wages, and workforce training opportunities;
13. 800 FD Order, Metric 32—Minn. R. 7849.1500 sup. 2: Impacts of Power Plants:
  - G. The anticipated amount of water that will be appropriated to operate the plant and the source of the water if known; and
  - J. The anticipated noise impacts of a project, including the distance to the closest receptor where state noise standards can still be met.

The Department recommends DESRI provide the above information in reply comments.

## *2. Invenergy*

Invenergy provided proposals for two projects:

- extend the power purchase agreement (PPA) with Xcel for the existing Cannon Falls combustion turbines (CT); and
- a solar plus battery hybrid project.

The Department notes that Invenergy was the only bidder that did not fill out Xcel's bid intake form for either bid. The Department recommends Invenergy fill out the bid intake form.<sup>9</sup>

The Department did not locate the following information regarding Invenergy's Cannon Falls proposal:

1. IRP Order, point C 2—Expected minimum load;
2. 800 FD Order, Metric 61—Information necessary for consideration of Energy Justice factors:
  - a. Socioeconomic factors of a project's location;
  - b. Involvement of local government, community organizations and, where relevant, Tribal Nations;
  - e. The commitment to the use of diverse suppliers, as demonstrated by a history of use on recent projects; and
  - f. The payment of prevailing wages, and workforce training opportunities.

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<sup>9</sup> Available at: [Xcel Firm Dispatchable Website](#)

The Department did not locate the following information regarding Invenergy's Lake Wilson proposal:

1. IRP Order, point C 2—Expected minimum load; and
2. IRP Order, point C 4—Limitations on operations.

All of the above information was provided in Invenergy's February 16, 2024 comment.

### *3. NG Renewables*

NG Renewables provided proposals for two projects:

- Harmony solar plus storage project; and
- Plum Creek wind plus storage project.

The Department did not locate the following information regarding NG Renewables' Harmony proposal:

1. Minn. R. 7849.0250 A (1)—Discussion of the impact of economies of scale on facility size and timing;
2. Minn. R. 7849.0320 E (1), (2), and (3)—Regarding water use:
  - a. Estimated maximum use including:
    - i. Groundwater pumping rate in gallons/minute
    - ii. Surface water appropriation in cubic feet/second
  - b. Estimated groundwater appropriation in million gallons/year;
  - c. Annual consumption in acre-feet;
3. Minn. R. 7849.0320 H—Potential types/quantities of solid wastes produced in tons/year;
4. IRP Order B (5)—Fixed operations and maintenance payment;
5. IRP Order B (6)—Variable operations and maintenance payment;
6. IRP Order B (8)—Tax-related payments and other costs;
7. IRP Order C (1) to (4)—Scheduling provisions, including but not limited to:
  - a. Planned maintenance;
  - b. Expected minimum load;
  - c. Ramp rates; and
  - d. Limitations on operations.
8. IRP Order D—Discussion of the guaranteed performance factors, such as construction costs, unit completion, availability, and efficiency;
9. 800 FD Order, Metric 32—Provide a climate change analysis of the proposal consistent with the Minnesota Environmental Quality Board's environmental assessment worksheet guidance for developing a carbon footprint and incorporating climate adaptation and resilience;<sup>10</sup> and

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<sup>10</sup> The guidance document is located here:  
<https://www.eqb.state.mn.us/sites/eqb/files/documents/2023%20EAW%20Climate%20Guidance.pdf>

10. 800 FD Order, Metric 32—Identifying whether the proposal is located in an environmental justice area using census criteria in Minnesota Statute 216B.1691, subd. 1(e).

The Department did not locate the following information regarding NG Renewables' Plum Creek proposal:

1. IRP Order B (5)—Fixed operations and maintenance payment;
2. IRP Order B (6)—Variable operations and maintenance payment;
3. IRP Order B (8)—Tax-related payments and other costs;
4. IRP Order C (1) to (4)—Scheduling provisions, including but not limited to:
  - a. Planned maintenance;
  - b. Expected minimum load;
  - c. Ramp rates; and
  - d. Limitations on operations.
5. IRP Order D—Discussion of the guaranteed performance factors, such as construction costs, unit completion, availability, and efficiency'
6. 800 FD Order, Metric 32—Provide a climate change analysis of the proposal consistent with the Minnesota Environmental Quality Board's environmental assessment worksheet guidance for developing a carbon footprint and incorporating climate adaptation and resilience;<sup>11</sup> and
7. 800 FD Order, Metric 32—Identifying whether the proposal is located in an environmental justice area using census criteria in Minnesota Statute 216B.1691, subd. 1(e).

The Department recommends NG Renewables provide the above information in reply comments.

#### 4. *NextEra*

NextEra provided proposals for three projects at three different locations:

- a solar plus battery hybrid project;
- a wind plus battery hybrid project; and
- a surplus storage project.

The Department did not locate the following information regarding all three of NextEra's proposals:

1. Minn. R. 7829.2500, Subp. 2—Brief summary of filing on separate page sufficient to apprise potentially interested parties of its nature and general content;
2. Minn. R. 7849.0200, Subp. 2—Title Page and Table of Contents;
3. Minn. R. 7849.0240, Subp. 1—Summary of the major factors that justify the need for the proposed facility;

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<sup>11</sup> The guidance document is located here:  
<https://www.egb.state.mn.us/sites/egb/files/documents/2023%20EAW%20Climate%20Guidance.pdf>



4. Minn. R. 7849.0240, Subp. 2—Relationship of the proposed facility to the following socioeconomic considerations:
  - a. Effects of the facility in inducing future development;
5. Minn. R. 7849.0250 A (1)—Discussion of the impact of economies of scale on facility size and timing;
6. Minn. R. 7849.0250, D—A map showing applicant’s system (here the proposed project);
7. Minn. R. 7849.0320 E (1), (2), and (3)—regarding water use:
  - a. Estimated maximum use including:
    - i. groundwater pumping rate in gallons/minute
    - ii. surface water appropriation in cubic feet/second
  - b. Estimated groundwater appropriation in million gallons/year;
  - c. Annual consumption in acre-feet;
8. Minn. R. 7849.0320 H—Potential types/quantities of solid wastes produced in tons/year;
9. Minn. R. 7849.0320 I—Potential sources/types of audible noise;
10. Minn. R. 7849.0320 J—Estimated work force required for construction and operation;
11. IRP Order, point C 1—Planned maintenance;
12. IRP Order, point C 3—Ramp rates;
13. IRP Order, point C 4—Limitations on operations;
14. IRP Order, point D—Discussion of the guaranteed performance factors, such as construction costs, unit completion, availability, and efficiency;
15. IRP Order, point E—Any other key contract terms the provider requires;
16. 800 FD Order, Metric 32—Provide a climate change analysis of the proposal consistent with the Minnesota Environmental Quality Board’s environmental assessment worksheet guidance for developing a carbon footprint and incorporating climate adaptation and resilience;<sup>12</sup>
17. 800 FD Order, Metric 32—Identifying whether the proposal is located in an environmental justice area using census criteria in Minnesota Statute 216B.1691, Subd. 1(e);
18. 800 FD Order, Metric 61—Information necessary for consideration of Energy Justice factors:
  - a. Socioeconomic factors of a project’s location;
  - b. Involvement of local government, community organizations and, where relevant, Tribal Nations;
  - c. Estimated local tax revenue it will produce;
  - d. The temporary and permanent jobs it will create;
  - f. The payment of prevailing wages, and workforce training opportunities.
19. 800 FD Order, Metric 32 G—The anticipated amount of water that will be appropriated to operate the plant and the source of the water if known;
20. 800 FD Order, Metric 32 H—The potential wastewater streams and the types of discharges associated with such a project including potential impacts of a thermal discharge;
21. 800 FD Order, Metric 32 I—The types and amounts of solid and hazardous wastes generated by such a project, including an analysis of what contaminants may be found in the ash and where the ash might be sent for disposal or reuse; and

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<sup>12</sup> The guidance document is located here:

<https://www.eqb.state.mn.us/sites/eqb/files/documents/2023%20EAW%20Climate%20Guidance.pdf>

22. 800 FD Order, Metric 32 J—The anticipated noise impacts of a project, including the distance to the closest receptor where state noise standards can still be met.

The Department did not locate the following information regarding NextEra’s solar plus battery hybrid and wind plus battery hybrid proposals:

1. Minn. R. 7849.0320, A—Estimated land requirements for facility, water storage, cooling system, and solid waste storages;
2. Minn. R. 7849.0320, B—Estimated amount of vehicular, rail, and barge traffic due to construction and operation; and
3. IRP Order, point C 3—Expected minimum load.

The Department did not locate the following information regarding NextEra’s wind plus battery hybrid proposal:

1. 800 FD Order, Metric 32 C—The anticipated contribution of the project to impairment of visibility within a 50-mile radius of the plant.

The Department recommends NextEra provide the above information in reply comments.

### *5. Onward*

Onward provided a proposal to extend the PPA with Xcel for existing natural gas fired generating facility, Mankato Energy Center I. Onward provided a main proposal and two black start unit additions as variations for three proposals total. The Department did not locate the following information regarding Onward’s proposals:

Regarding the base proposal and the two black start units:

1. IRP Order, point B 5—Fixed operations and maintenance payment;
2. IRP Order, point B 6—Variable operations and maintenance payment;
3. IRP Order, point B 7—Fuel payment;
4. IRP Order, point B 8—Tax-related payments and other costs;
5. 800 FD Order, Metric 32—Provide a climate change analysis of the proposal consistent with the Minnesota Environmental Quality Board’s environmental assessment worksheet guidance for developing a carbon footprint and incorporating climate adaptation and resilience;<sup>13</sup>
6. 800 FD Order, Metric 61—commitment to the use of diverse suppliers, as demonstrated by a history of use on recent projects; and

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<sup>13</sup> The guidance document is located here:  
<https://www.egb.state.mn.us/sites/egb/files/documents/2023%20EAW%20Climate%20Guidance.pdf>

7. 800 FD Order, Metric 61—The payment of prevailing wages, and workforce training opportunities.

Regarding the diesel black start unit:

1. Minn. R. 7849.0250 A (1)—Nominal generating capability of the facility, and discussion of economies of scale on facility size and timing;
2. Minn. R. 7849.0250 A (4)—Anticipated heat rate of the facility; and
3. IRP Order, point B 3—Contract capacity.

The Department recommends **Onward** provide the above information in reply comments.

#### *6. Rondo*

Rondo provided a proposal for a thermal heat battery. The Department did not locate the following information regarding Rondo's proposal:

1. Minn. R. 7849.0250 A (1)—Discussion of the impact of economies of scale on facility size and timing;
2. Minn. R. 7849.0320 A—An estimate of the land requirement (in acres);
3. Minn. R. 7849.0320 B—Estimated amount of vehicular traffic due to construction and operation;
4. Minn. R. 7849.0320 E (1), (2), (3), and (4)—Regarding water use:
  - a. Estimated maximum use including:
    - i. Groundwater pumping rate in gallons/minute
    - ii. Surface water appropriation in cubic feet/second
  - b. Estimated groundwater appropriation in million gallons/year;
  - c. Annual consumption in acre-feet;<sup>14</sup>
5. Minn. R. 7849.0320 F—Potential sources/types of discharges to water;
6. Metric 32 G—Anticipated amount of water that will be appropriated to operate the plant;<sup>15</sup>

The Department recommends **Rondo** provide the above information in reply comments.

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<sup>14</sup> Note that Rondo states that the project would use water rights held by Xcel's Sherco facility. However, Rondo did not estimate the amounts of water to be used, which is what the rule requires.

<sup>15</sup> Again, Rondo states that the project would use water rights held by Xcel's Sherco facility. However, Rondo did not estimate the amounts of water to be used, which is what Metric 32 G requires.

## 7. *Xcel*

Xcel provided proposals for three projects:

- Bison Generating Station—Two combustion turbine (CT) generators and three reciprocating internal combustion engines (RICE);
- Lyon County Generating Station—Two CTs; and
- Sherco West BESS—two variations on battery energy storage systems (BESS).

The Department did not locate the following overall information regarding Xcel's proposals:

1. Minn. R. 7849.0270 Subp. 2, the following data for each forecast year:
  - A. Annual consumption by ultimate consumers within applicant's Minnesota service area;
  - B. Estimates of total ultimate consumers and their annual consumption for several customer classes,
  - C. Estimate of demand on applicant's system at time of annual system peak demand, including breakdown of demand into consumer categories;
  - D. Applicant's system peak demand by month;
  - E. Estimated annual revenue requirement/kWh for system in current dollars;
  - F. Applicant's estimated average system weekday load factor by month;
2. Minn. R. 7849.0270 Subp. 3 D (3)—Results of appropriate statistical tests;
3. Minn. R. 7849.0270 Subp. 3 F—Brief analysis of methodology used, including:
  - (1) Strengths and weaknesses;
  - (2) Suitability to the system;
  - (3) Cost considerations;
  - (4) Data requirements;
  - (5) Past accuracy; and
  - (6) Other significant factors;
4. Minn. R. 7849.0270 Subp. 5, Essential forecast assumptions made regarding:
  - C. Future electricity prices in applicant's system and their effect on system demand;
  - D. Subpart 2 data that is not available historically nor created by applicant for forecast;
5. Minn. R. 7849.0270 Subp. 6, Coordination of forecasts:
  - A. Description of extent applicant coordinates load forecasts with other systems; and
  - B. Description of forecast coordination, including problems experienced.
6. Minn. R. 7849.0280 System Capacity Description:
  - E. Load and generation capacity data requested in item D/sub-items (1)-(13) for summer and winter seasons for each forecast year subsequent to the year of application, including purchases, sales, and generating capability contingent on the proposed facility;
  - F. For the summer season and for the winter season corresponding to each forecast year subsequent to the year of application, the load and generation capacity data requested in item D, subitems (1) to (13), including all projected purchases, sales, and generating capability;

- G. List of proposed additions/retirements in net generating capability for each forecast year subsequent to the year of application; and
- H. Graph showing monthly adjusted net demand, monthly adjusted net capability, and difference between adjusted net capability and actual, planned, or estimated maintenance outages of generation/ transmission for specified time periods.

The above forecast information is available in the Company's *Electric Utility Annual Report* filed under Minn. R. 7610<sup>16</sup> The Department recommends Xcel file the most recent *Electric Utility Annual Report* to cover these requirements.

The Department did not locate the following information regarding Xcel's Bison and Lyon County proposals:

- 1. Minn. R. 7849.0240 Subp. 2 C—Effects of the facility in inducing future development; and
- 2. Minn. R. 7849.0250 A (1)—Discussion of economies of scale on facility size and timing.

The Department did not locate the following information regarding Sherco West BESS proposal:

- 1. Minn. R. 7849.0320 H—Potential types/quantities of solid wastes produced in tons/year.

The Department recommends Xcel provide the above information in reply comments.

#### **B. PROCESS FOR THE DOCKET**

The second issue listed in the Notice is "Should the Commission refer the matter to the Office of Administrative Hearings (OAH) for contested case proceedings?"

At this time the Department does not have any contested issues of fact. Therefore, the Department does not request the Commission refer the matter to OAH for a contested case proceeding.

#### **C. OTHER ISSUES**

The third issue listed in the Notice is "Any other completeness or initial procedural issues that should be addressed before the review process and the evaluation of the merits begin."

Given the technical complexity of the evaluation criteria<sup>17</sup> the Department recommends the process be structured so that Xcel evaluates the bids deemed complete as comments or direct testimony and for

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<sup>16</sup> The most recent filing is available in Docket No. E999/PR-23-11.

<sup>17</sup> For example, the Flexibility (Nos. 43 to 48) and Essential Reliability Services (Nos. 49 to 58) in the Resource Attributes Matrix, provided as Attachment A, Appendix A of Xcel's November 13, 2023 Compliance Filing.

other parties to then respond to Xcel's evaluation in a subsequent round of analysis. This is the standard process in recent RFPs.<sup>18</sup>

The Commission-approved schedule, provided above, has approximately 7 months<sup>19</sup> between the date of the Commission's completeness determination and the end of the record development. This schedule was in part driven by Xcel's need for capacity in the 2027 to 2029 timeframe. The Company's most recent resource plan, filed February 1, 2024, indicates that Xcel continues to have a need for capacity by summer 2027.<sup>20</sup>

With the bids now available, the Department recommends that Xcel indicate in reply comments how much time would be required for the Company to complete the required evaluation of bids and present that evaluation (in comments or testimony) so that the viability of the current schedule can be determined by the Commission.

### **III. DEPARTMENT RECOMMENDATION**

The Department recommends the Commission declare the proposals of:

- DESRI;
- NG Renewables;
- NextEra;
- Onward;
- Rondo; and
- Xcel;

as being complete upon submission of additional data as specified above.

The Department recommends Invenergy's proposals be declared complete as of Invenergy's February 16, 2024 comment.

The Department also recommends the process be structured so that Xcel analyzes the bids deemed complete in comments or direct testimony and for other parties to then respond to Xcel's evaluation in a subsequent round of analysis. Finally, the Department recommends that Xcel indicate in reply comments how much time would be required for the Company to complete the required evaluation of bids.

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<sup>18</sup> For two recent examples see the processes followed in Docket Nos. E002/M-23-342 and E002/M-22-403.

<sup>19</sup> The Department recognizes, as cited above, that the Commission also delegated authority to the Commission's Executive Secretary to modify the established deadlines.

<sup>20</sup> See Tables 3-4 to 3-7 of Xcel's petition in Docket No. E002/RP-24-67. Available at: [20242-203027-01](#)

## **CERTIFICATE OF SERVICE**

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

**Minnesota Department of Commerce**  
**Comments**

**Docket No. E002/CN-23-212**

Dated this **20<sup>th</sup>** day of **February 2024**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	ross.abbay@us-solar.com	United States Solar Corp.	100 North 6th St Ste 222C  Minneapolis, MN 55403	Electronic Service	No	OFF_SL_23-212_Official
Gary	Ambach	Gambach@slipstreaminc.org	Slipstream, Inc.	8973 SW Village Loop  Chanhassen, MN 55317	Electronic Service	No	OFF_SL_23-212_Official
Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato	P.O. Box 3368  Mankato, MN 560023368	Electronic Service	No	OFF_SL_23-212_Official
Mara	Ascheman	mara.k.ascheman@xcenergy.com	Xcel Energy	414 Nicollet Mall Fl 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-212_Official
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325  Washington, DC 20036	Electronic Service	No	OFF_SL_23-212_Official
Sarah	Beimers	sarah.beimers@state.mn.us	Department of Administration - State Historic Preservation Office	50 Sherburne Avenue Suite 203 St. Paul, MN 55155	Electronic Service	No	OFF_SL_23-212_Official
David	Bell	david.bell@state.mn.us	Department of Health	POB 64975  St. Paul, MN 55164	Electronic Service	No	OFF_SL_23-212_Official
David	Bender	dbender@earthjustice.org	Earthjustice	1001 G Street NW Suite 1000 Washington, DC 20001	Electronic Service	No	OFF_SL_23-212_Official
Tracy	Bertram	tbertram@ci.becker.mn.us		12060 Sherburne Ave Becker City Hall Becker, MN 55308-4694	Electronic Service	No	OFF_SL_23-212_Official
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-212_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC	855 Village Center Drive #256  North Oaks, MN 55127	Electronic Service	No	OFF_SL_23-212_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_23-212_Official
Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy	10 2nd St NE Ste. 400  Minneapolis, MN 55413	Electronic Service	No	OFF_SL_23-212_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_23-212_Official
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_23-212_Official
Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350	729 6th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_23-212_Official
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_23-212_Official
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-212_Official
Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 401-8  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-212_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_23-212_Official
J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Ste 350  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_23-212_Official
Christopher	Droske	christopher.droske@minneapolismn.gov	City of Minneapolis	661 5th Ave N  Minneapolis, MN 55405	Electronic Service	No	OFF_SL_23-212_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_23-212_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_23-212_Official
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_23-212_Official
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_23-212_Official
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_23-212_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_23-212_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International	5600 N Highway 169  Minneapolis, MN 55428-3096	Electronic Service	No	OFF_SL_23-212_Official
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E  Little Canada, MN 55117	Electronic Service	No	OFF_SL_23-212_Official
Amy	Fredregill	afredregill@environmental-initiative.org	Environmental Initiative, MN Sustainable Growth Coalition	211 First St N Ste 250  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-212_Official
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_23-212_Official
Todd	Green	Todd.A.Green@state.mn.us	Minnesota Department of Labor & Industry	443 Lafayette Rd N  St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_23-212_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_23-212_Official
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_23-212_Official
Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.	570 Colonial Park Drive Suite 305 Roswell, GA 30075-3770	Electronic Service	No	OFF_SL_23-212_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_23-212_Official
Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-212_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club	2101 Webster St Ste 1300  Oakland, CA 94612	Electronic Service	No	OFF_SL_23-212_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_23-212_Official
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-212_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave.  Marathon, FL 33050	Electronic Service	No	OFF_SL_23-212_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-212_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_23-212_Official
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9  Chicago, IL 60604	Electronic Service	No	OFF_SL_23-212_Official
Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-212_Official
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_23-212_Official
Frank	Kohlasch	frank.kohlasch@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N.  St. Paul, MN 55155	Electronic Service	No	OFF_SL_23-212_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Kolbinger	brian@beckertownship.org	Becker Township Board	PO Box 248 12165 Hancock St Becker, MN 55308	Electronic Service	No	OFF_SL_23-212_Official
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_23-212_Official
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd.  St. Paul, MN 55155	Electronic Service	No	OFF_SL_23-212_Official
Kay	Kuhlmann	Teri.Swanson@ci.red-wing.mn.us	City Of Red Wing	315 West Fourth Street  Red Wing, MN 55066	Electronic Service	No	OFF_SL_23-212_Official
Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce	401 N Robert Street Suite 150 St Paul, MN 55101	Electronic Service	No	OFF_SL_23-212_Official
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-212_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_23-212_Official
Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello	505 Walnut St Ste 1  Monticello, MN 55362	Electronic Service	No	OFF_SL_23-212_Official
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_23-212_Official
Alice	Madden	alice@communitypowermn.org	Community Power	2720 E 22nd St  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_23-212_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_23-212_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_23-212_Official
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Taylor	McNair	taylor@gridlab.org		668 Capp Street San Francisco, CA 94110	Electronic Service	No	OFF_SL_23-212_Official
Melanie	Mesko Lee	Melanie.Lee@burnsvillemn.gov	City of Burnsville	100 Civic Center Parkway Burnsville, MN 55337-3867	Electronic Service	No	OFF_SL_23-212_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_23-212_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_23-212_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-212_Official
Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_23-212_Official
Alan	Muller	alan@greendel.org	Energy & Environmental Consulting	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_23-212_Official
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-212_Official
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M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-212_Official
Ric	O'Connell	ric@gridlab.org	GridLab	2120 University Ave  Berkeley, CA 94704	Electronic Service	No	OFF_SL_23-212_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_23-212_Official
J. Gregory	Porter	greg.porter@nngco.com	Northern Natural Gas Company	1111 South 103rd St  Omaha, NE 68124	Electronic Service	No	OFF_SL_23-212_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_23-212_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_23-212_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_23-212_Official
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_23-212_Official
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N  Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_23-212_Official
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW  Rochester, MN 55901	Electronic Service	No	OFF_SL_23-212_Official
Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-212_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Mark	Schoennauer	markwsch@hotmail.com		607 19th St NW Apt 17  Rochester, MN 55901	Electronic Service	No	OFF_SL_23-212_Official
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Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_23-212_Official
Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center	8421 Wayzata Blvd Ste 300  Golden Valley, MN 55426	Electronic Service	No	OFF_SL_23-212_Official
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_23-212_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	Yes	OFF_SL_23-212_Official
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Edyta	Sitko	esitko@ucsusa.org	Union of Concerned Scientists	1 N Lasalle Ave  CHICAGO, IL 60602	Electronic Service	No	OFF_SL_23-212_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_23-212_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency	Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago, IL 60604-3590	Electronic Service	No	OFF_SL_23-212_Official
Carla	Vita	carla.vita@state.mn.us	MN DEED	Great Northern Building 12th Floor 180 East Fifth Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-212_Official
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Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 St. Paul, MN 55104	Electronic Service	No	OFF_SL_23-212_Official
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, MN 55155-4040	Electronic Service	No	OFF_SL_23-212_Official
Alan	Whipple	sa.property@state.mn.us	Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul, MN 551463340	Electronic Service	No	OFF_SL_23-212_Official
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_23-212_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-212_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Tim	Wulling	t.wulling@earthlink.net		1495 Raymond Ave. Saint Paul, MN 55108	Electronic Service	No	OFF_SL_23-212_Official
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_23-212_Official
Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park	5005 Minnetonka Blvd St. Louis Park, MN 55416	Electronic Service	No	OFF_SL_23-212_Official
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-212_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sarah	Beimers	sarah.beimers@state.mn.us	Department of Administration - State Historic Preservation Office	50 Sherburne Avenue Suite 203 St. Paul, MN 55155	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS
David	Bell	david.bell@state.mn.us	Department of Health	POB 64975  St. Paul, MN 55164	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS
Randall	Doneen	randall.doneen@state.mn.us	Department of Natural Resources	500 Lafayette Rd, PO Box 25  Saint Paul, MN 55155	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS
Annie	Felix Gerth	annie.felix-gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS
Todd	Green	Todd.A.Green@state.mn.us	Minnesota Department of Labor & Industry	443 Lafayette Rd N  St. Paul, MN 55155-4341	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500  St. Paul, MN 55101	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS
Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers	180 5th St # 700  Saint Paul, MN 55101	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd.  St. Paul, MN 55155	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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	SPL_SL__CN - CERTIFICATE OF NEEDS
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N  Saint Paul, MN 55155-2538	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS
Jayme	Trusty	execdir@swrdc.org	SWRDC	2401 Broadway Ave #1  Slayton, MN 56172	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS
Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency	Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago, IL 60604-3590	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, MN 55155-4040	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS
Alan	Whipple	sa.property@state.mn.us	Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul, MN 551463340	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety	445 Minnesota St Ste 147  Woodbury, MN 55125	Electronic Service	No	SPL_SL__CN - CERTIFICATE OF NEEDS