

March 11, 2015

Via Electronic Mail and U.S. Mail

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101

Re: **Supplement of Calpine Corporation**

In the Matter of the Petition Northern States Power Company for Approval of Competitive Resource Acquisition Proposal and Certificate of Need

Docket Nos.: E-002/CN-12-1240, E-002/M-14-788 and E-002/M-14-789

Dear Mr. Wolf:

On March 6, 2015, Calpine Corporation and its affiliate Mankato Energy Center, LLC (“Calpine”) submitted their Answer to the Minnesota Department of Commerce’s (“Department”) Request for Clarification or Reconsideration (“Department Request”) and Invenergy Thermal Development LLC’s (“Invenergy”) Petition for Rehearing and Reconsideration (“Invenergy Petition”) in the above-captioned proceedings.

In its Answer, Calpine committed to keeping the Minnesota Public Utilities Commission (“Commission”) informed regarding any action taken by the Federal Energy Regulatory Commission (“FERC”) on the Midcontinent Independent System Operator Inc.’s (“MISO”) request for approval of the Calpine Generator Interconnection Agreement (“GIA”). Attached as Exhibit A is FERC’s March 10, 2015 Order accepting the Calpine GIA effective October 16, 2014, and rejecting Invenergy’s Protest. In its Order FERC concluded “that MISO has provided sufficient information through its Deficiency Letter Response and Answer for the Commission to determine the appropriateness of the proposed amendments to the Original GIA.” *See Midcontinent Independent System Operator Inc.*, 150 FERC ¶ 61,180 at P 23 (2015).

Accordingly, Calpine’s reiterates its request that the Commission reject the Petitions seeking reconsideration and rehearing of its February 5 Order. The February 5 Order reflects reasoned and

Daniel P. Wolf
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reasonable decision-making and nothing in the filed Petitions raise issues or arguments that were not fully considered in the issuance of the Order.

Thank you for your attention to this matter.

Sincerely,

STINSON LEONARD STREET LLP

Brian Meloy

Brian M. Meloy

BMM/cw
Attachments

EXHIBIT A

FERC's March 10, 2015 Order Accepting Calpine Generator Interconnection Agreement

150 FERC ¶ 61,180
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Cheryl A. LaFleur, Chairman;
Philip D. Moeller, Tony Clark,
Norman C. Bay, and Colette D. Honorable.

Midcontinent Independent
System Operator, Inc.

Docket No. ER15-104-001

ORDER ACCEPTING GENERATOR INTERCONNECTION AGREEMENT

(Issued March 10, 2015)

1. On October 15, 2014, Midcontinent Independent System Operator, Inc. (MISO) filed, pursuant to section 205 of the Federal Power Act (FPA)¹ and Part 35 of the Commission's regulations,² an executed Amended and Restated Generator Interconnection Agreement (Amended GIA) among MISO, Mankato Energy Center, LLC (Mankato), and Northern States Power Company, a Minnesota corporation (Northern States Minnesota) (October 15 Filing). We accept the Amended GIA for filing effective October 16, 2014, as discussed in the body of this order.

I. Background

2. On January 21, 2005, the Commission accepted a Generator Interconnection Agreement (Original GIA) among MISO, Mankato, and Northern States Minnesota, by letter order in Docket No. ER05-344-000. MISO's October 15 Filing proposes to make various changes to the Original GIA to reflect Mankato's completion of Phase I of the large generating facility subject to the agreement and the build out of Phase II, which requires installation of network upgrades on Northern State Minnesota's transmission system. MISO also proposes to revise (1) section 5.9 to reflect how the maximum permissible output of the facility will be updated if the network upgrades necessary for interconnection are not in service six months following the commercial operation date

¹ 16 U.S.C. § 824d (2012).

² 18 C.F.R. pt. 35 (2014).

(COD); (2) section 11.4.1 to update how repayment of amounts advanced for required network upgrades will be determined; (3) Appendix A to reflect an extension of the COD for Phase II of the project from June 1, 2007 to June 1, 2018, including updated costs associated with the network upgrades required to complete Phase II and a current listing of higher-queued projects; and (4) Appendix B to include the new milestones associated with Phase II of the project.³

3. On December 12, 2014, Commission staff, pursuant to delegated authority, issued a letter informing MISO that its October 15 Filing was deficient and that the Commission would need further information in order to process the filing (Deficiency Letter). More specifically, Commission staff asked MISO to explain how the 11-year COD extension is appropriate under MISO's Generation Interconnection Procedures (GIP) and the Original GIA, and to include all factors that MISO took into consideration in finding that the proposed extension is appropriate. On January 9, 2015, MISO filed a response to the Deficiency Letter (Deficiency Letter Response).

II. Notice of Filing and Responsive Pleadings

4. Notice of MISO's October 15 Filing was published in the *Federal Register*, 79 Fed. Reg. 63,111 (2014), with interventions and protests due on or before November 5, 2014. Calpine Corporation (Calpine) filed a timely motion to intervene. Great River Energy filed an out-of-time motion to intervene and comments. On December 1, 2014, MISO filed an answer to Great River Energy's out-of-time motion to intervene and comments. On December 8, 2014, Great River Energy withdrew its out-of-time motion to intervene and comments.

5. Notice of MISO's Deficiency Letter Response was published in the *Federal Register*, 80 Fed. Reg. 2688 (2015), with interventions and protests due on or before January 30, 2015. In response, Great River Energy and American Wind Energy Association (AWEA) filed timely motions to intervene. Calpine filed timely comments. Invenergy Thermal Development LLC and Invenergy Wind Development LLC (collectively, Invenergy) filed a timely motion to intervene and protest. On February 3, 2015, AWEA and Wind on the Wires (WOW) jointly filed comments.⁴

³ While the *pro forma* GIA is organized into articles, this order uses the same nomenclature used by the parties to the proceeding, i.e., sections.

⁴ AWEA and WOW title their February 3, 2015 filing as comments; however, they state that the filing is in response to Invenergy's protest. Therefore, we will treat this filing as an answer for procedural purposes herein.

On February 18, 2015, MISO filed a motion for leave to answer and answer. On March 2, 2015, Calpine filed out-of-time comments.⁵

6. MISO's Deficiency Letter Response explains that, under section 5.16 of the Original GIA, Mankato has three years of suspension rights, which permitted Mankato a COD extension from June 2007 to June 2010.⁶ MISO further explains that, pursuant to section 2.3.1 of the Original GIA, "MISO would wait an additional three consecutive years (until June 1, 2013) from the planned Commercial Operation Date (2010) before considering whether to file to terminate Phase II of the GIA for failing to reach Commercial Operation had the Interconnection Customer [Mankato] not advanced the project."⁷ MISO states that, at some point between June 1, 2010 and June 1, 2013,

⁵ Calpine titles its March 2, 2015 filing as comments; however, the filing almost exclusively addresses arguments advanced in protests by Invenergy and AWEA and WOW. Therefore, we will treat this filing as an answer for procedural purposes herein.

⁶ Section 5.16 of the Original GIA provides the Interconnection Customer suspension rights and states that

[i]n the event Interconnection Customer suspends work by Transmission Owner required under this [Large GIA (LGIA)] pursuant to this Article 5.16, and has not requested Transmission Owner to recommence the work required under this LGIA on or before the expiration of three (3) years following commencement of such suspension, this LGIA shall be deemed terminated. The three-year period shall begin on the date the suspension is requested, or the date of the written notice to Transmission Provider, if no effective date is specified.

⁷ Deficiency Letter Response at 2. Section 2.3 describes agreement termination procedures. As relevant to MISO's argument, section 2.3.1 provides that the Original GIA

may be terminated...by Transmission Provider if the Generating Facility has ceased Commercial Operation for three (3) consecutive years, beginning with the last date of Commercial Operation for the Generating facility, after giving the Interconnection Customer ninety (90) Calendar Days advance written notice. The Generating Facility will not be deemed to have ceased Commercial Operation for purposes of this Section 2.3.1 if the Interconnection Customer can document that it has taken other

(continued ...)

Mankato informed MISO that it was ready to proceed with Phase II, and that MISO began the interconnection studies to determine the necessary transmission upgrades to accommodate Phase II of the agreement.⁸ MISO states that the October 15 Filing and the new 2018 COD are products of the restudies.

7. MISO further explains that it does not require a project to achieve Commercial Operation prior to the In-Service Dates of the full required Network Upgrades and Contingent Facilities for the project. MISO states that while an interconnection customer may voluntarily choose to utilize MISO's limited operations provisions in order to begin operations prior to the completion of other projects' Network Upgrades (often with long-term In-Service Dates), it does not require interconnection customers to do so. MISO notes that in Exhibit A10 of the Amended GIA, the restudies found that Phase II of the project is conditional upon MISO Multi-Value Projects being completed. These projects have in-service dates in 2018. Consequently, the interconnection customer requested a 2018 COD for the Phase II portion of the GIA, and MISO was agreeable with that date.⁹

8. Calpine filed comments supporting MISO's Deficiency Letter Response, claiming that MISO fully satisfied the Commission's request for information and that the COD extension is consistent with the terms of the Original GIA.¹⁰ Calpine believes that MISO correctly applied sections 5.16 and 2.3.1 to permit a COD extension until June 1, 2013 before MISO would consider whether to terminate Phase II for failing to meet commercial operation. Calpine states that before June 1, 2013, Mankato informed MISO it was ready to proceed with Phase II, and that MISO performed the interconnection

significant steps to maintain or restore operational readiness of the Generating Facility for the purpose of returning the Generating Facility to Commercial Operation as soon as possible.

⁸ Deficiency Letter Response at 2 (citing *Midwest Indep. Transmission Sys. Operator, Inc.*, 116 FERC ¶ 61,252, at PP 39-42 (2006) (rejecting proposed revisions to add specific post-suspension procedures in the Appendices of an LGIA, but noting that a Transmission Owner may reasonably find that developing a new schedule after suspension requires restudy consistent with sections 6.4, 7.6, and 8.5 of the then-effective GIP); *Jeffers South, LLC v. Midwest Indep. Transmission Sys. Operator, Inc.*, 144 FERC ¶ 61,033, at P 77 (2013) (after a suspension period, the Commission noted that it was appropriate to "take into account the existing interconnection queue.")).

⁹ *Id.* at 2-3.

¹⁰ Calpine Comments I at 1-2.

restudies accordingly, consistent with the GIP and Commission precedent.¹¹ Calpine urges the Commission to accept the Amended GIA because the Minnesota Public Utility Commission (Minnesota Commission) recently approved a long-term power purchase agreement (PPA) between Mankato and Xcel Energy (Xcel) that requires deliveries from Phase II in 2018, and because the Minnesota Commission determined that Phase II is a required capacity addition to ensure reliability for Xcel and its customers.¹²

9. Invenergy protests the October 15 Filing because it believes that MISO's Deficiency Letter Response did not adequately respond to the Deficiency Letter and that MISO improperly implemented section 2.3.1 of the Original GIA to allow a three-year COD extension beyond that attendant to the suspension rights provided in section 5.16. Invenergy requests that the Commission seek further explanation from MISO and clarify the applicability of section 2.3.1 of the Original GIA and section 3.3.1 of the MISO GIP in processing requests for COD extensions.¹³ Invenergy believes that section 2.3.1 may

¹¹ *Id.* at 3 & n.11 (citing *Midwest Indep. Transmission Sys. Operator, Inc.*, 138 FERC ¶ 61,233 (2012) (Queue Reform III Order), *order on reh'g and compliance*, 139 FERC ¶ 61,253, at P 36 (2012) (Queue Reform III Rehearing Order) (finding that Mankato "would not be required to transition to [MISO's] revised GIP at this time" because the Original GIA had been filed with the Commission but "that section 8.7 of the GIP provides that a restudy shall be performed subject to the GIP in effect at the time that an interconnection customer receives notice of a restudy from MISO.")).

¹² *Id.* at 4.

¹³ Section 3.3.1 of MISO's GIP states, in relevant part, that

[t]he expected In-Service Date of the Generating Facility shall be no later than the process window for the Transmission Provider's regional expansion planning period not to exceed seven years from the date the Interconnection Request is received by Transmission Provider, unless Interconnection Customer demonstrates that engineering, permitting and construction of the Generating Facility will take longer than the regional expansion planning period, nor shall it be any sooner than the process time described in the Generator Interconnection Procedures and confirmed in the Pre-Queue Phase. The In-Service Date may succeed the date the Interconnection Request is received by Transmission Provider by a period up to ten years, or longer where Interconnection Customer and Transmission Provider agree, such agreement not to be unreasonably withheld.

have been improperly applied because it believes that section 2.3.1 addresses circumstances that arise when a project has reached commercial operation and subsequently goes out of service, rather than providing a three-year extension to the COD of a project that has not reached commercial operation, such as the extension of the Phase II COD to June 1, 2013. Further, in light of MISO's endorsement of Mankato's COD extension, Invenergy requests clarification that section 3.3.1 of MISO's GIP does not prohibit accommodating a COD for any project that extends more than ten years beyond the date of the Interconnection Request. Invenergy further requests that the Commission require MISO to demonstrate that it applies its practices consistently and/or has not harmed other generation developers through its practices and notes that, because Market Participants have no way to monitor MISO's administration of queue procedures and GIAs, Market Participants must rely on the Commission to oversee such practices. Accordingly, Invenergy proposes a set of directives to MISO to provide information regarding its generator interconnection practices.¹⁴

10. AWEA and WOW state that they are concerned about the issues highlighted in Invenergy's protest. Specifically, they have concerns that MISO is giving preferential treatment to certain interconnection customers, and that MISO is failing to follow its tariff and the terms of GIAs and the GIP.¹⁵ AWEA and WOW suggest that MISO's treatment of Mankato's COD extension is inconsistent with MISO's recent efforts to terminate GIAs for wind projects that do not meet their GIA schedules. They also encourage the Commission to clarify the procedures that should be used to properly extend a project COD, specifically that section 3.3.1 is not a bar on extending a project COD beyond ten years of the project's interconnection request.¹⁶

11. In its answer, MISO disagrees that its actions did not comply with the GIP and GIA, or that it acted in an unduly discriminatory manner.¹⁷ MISO reiterates that Mankato was put into suspension under section 5.16 of the Original GIA, extending the COD for Phase II until June 1, 2010. MISO further explains that because Mankato's Phase II was considered suspended from 2007 to 2010, MISO would not have sought to terminate the Original GIA with respect to Phase II until three years later, as called for in section 2.3.1

¹⁴ Invenergy Protest at 7-10.

¹⁵ AWEA and WOW Answer at 2.

¹⁶ *Id.* at 3.

¹⁷ MISO Answer at 3.

of the Original GIA and consistent with treatment applied to other customers.¹⁸ MISO disputes AWEA's and WOW's assertion that MISO improperly permitted Mankato's Phase II to proceed while moving to terminate the GIAs of recent wind projects, noting that MISO applied the same treatment accorded the Mankato project to recent filings to terminate GIAs for failure to reach commercial operation pursuant to section 2.3.1 by waiting the required three years afforded under section 2.3.1 before filing to terminate those GIAs. MISO explains, however, that Mankato ultimately notified MISO that it was ready to proceed with Phase II before it faced the risk of termination under section 2.3.1 (prior to June 2013).¹⁹

12. MISO also explains that MISO's current process requires more recently negotiated GIAs to include readiness milestones that were not required in the Original GIA for Phase II of the project, and failure to meet these milestones or other payment milestones has been the basis for the recent GIA termination filings identified by AWEA and WOW.²⁰ MISO states that any appearance of differing treatment of Mankato and other customers whose GIAs have been terminated is not due to any undue discrimination, but is the result of Phase II of the project not being similarly situated to other projects in the queue because of its vintage and the lack of milestones in the Original GIA.²¹ MISO also states that this is particularly true because MISO's *pro forma* GIA now limits suspension rights under section 5.16.1 to situations where "a *Force Majeure* event occurs."²² MISO also argues that because the Commission found that Mankato would not be subject to the

¹⁸ *Id.* at 4-6. MISO states it has recently filed notices of termination based on section 2.3.1 of the *pro forma* GIA. *See id.* at 4 n. 8 (citing filing in Docket No. ER15-254 (letter order issued January 27, 2015, accepting notice of termination based on failure to achieve Commercial Operation)).

¹⁹ *Id.* at 6-7.

²⁰ *Id.* at 7.

²¹ *Id.* at 8.

²² *Id.* at 7 (citing MISO Tariff, Attachment X, Appendix 6 (*pro forma* GIA), section 5.16.1).

new GIP,²³ the new required milestones did not apply and Mankato retained its suspension rights under section 5.16 of the Original GIA.²⁴

13. MISO disagrees with Invenergy's argument that section 2.3.1 of the Original GIA only applies in circumstances when a project begins commercial operation and then goes out of service, and argues that Invenergy misapplies language from MISO's Order No. 2003 compliance filing.²⁵ MISO states that in its Order No. 2003 compliance filing MISO spoke generally about concerns of hoarding capacity, which applies to both projects that enter then cease commercial operation, as well as those that never reach commercial operation.²⁶ MISO also clarifies that the *pro forma* GIA now expressly states that section 2.3.1 applies "if the Generating Facility or a portion of the Generating Facility fails to achieve Commercial Operation for three (3) consecutive years following the Commercial Operation Date, or has ceased Commercial Operation for three (3) consecutive years, beginning with the last date of Commercial Operation for the Generating Facility"²⁷

14. MISO also disagrees with Invenergy's concern that MISO did not perform adequate analysis regarding the state of the interconnection queue. MISO states that it followed its process to restudy the project taking into account the queue at the time, and as a result Mankato will be required to construct upgrades for Phase II.²⁸ Furthermore, MISO states that it restudied the project separately, but in accordance with its usual Definitive Planning Phase process, including all study deposit and entry milestone payments.²⁹ With regard to Invenergy's request that the Commission provide clarification regarding section 3.3.1 of the GIP, MISO states that, as Invenergy acknowledges in its protest, section 3.3.1 applies only to the COD requested at the

²³ MISO Answer at 8 (citing Queue Reform III Rehearing Order, 139 FERC ¶ 61,253 at P 36).

²⁴ *Id.* at 8.

²⁵ *Id.* at 5 (citing Invenergy Protest at 11).

²⁶ *Id.*

²⁷ *Id.* at 5 (citing MISO Tariff, Attachment X, Appendix 6 (*pro forma* GIA), section 2.3.1).

²⁸ *Id.* at 8-9.

²⁹ *Id.*

application stage, and as such the provision is irrelevant in this proceeding involving modifications to the Original GIA. MISO also states that if Invenergy has general questions regarding the MISO tariff, Invenergy should raise those questions with MISO or in the MISO stakeholder process.³⁰ MISO also states that the Commission should deny Invenergy's request for additional information.³¹

15. In its March 2, 2015 comments, Calpine again urges the Commission to accept the Amended GIA and denies that MISO had acted improperly or engaged in any unduly preferential or discriminatory behavior. Calpine emphasizes that, as MISO states, any differing treatment between Mankato and other customers results from the vintage of the Original GIA and the associated lack of readiness milestones. Calpine states that Mankato fully complied with the terms of the Original GIA in invoking its suspension rights and the terms of the GIP during the restudy process.³²

III. Discussion

A. Procedural Matters

16. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2014), the timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

17. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2014), prohibits an answer to a protest unless otherwise ordered by the decisional authority. We will accept the answers because they have provided information that assisted us in our decision-making process.

B. Commission Determination

18. We accept the Amended GIA for filing, effective October 16, 2014, as requested, including MISO's application of sections 5.16 and 2.3.1 in the Original GIA to extend the COD of Phase II to June 1, 2013. Notably, the Original GIA's suspension and termination provisions differ from those in the current *pro forma* GIA. The Original GIA provides interconnection customers unqualified suspension rights under section 5.16, while the current *pro forma* GIA now limits suspension rights to situations where a

³⁰ *Id.* at 9.

³¹ *Id.* at 10.

³² Calpine Comments II at 4.

Force Majeure event occurs such that the initial three-year suspension rights utilized here by Mankato are no longer available under GIAs negotiated more recently.

19. We disagree that section 2.3.1 must be interpreted to apply only where a project has gone into commercial operation and subsequently gone out of service. As MISO notes, section 2.3.1 contemplates the reservation of interconnection capacity for non-operational projects, and MISO has since clarified this section in its *pro forma* GIA to expressly include projects that “fail[] to achieve Commercial Operation for three (3) consecutive years following the Commercial Operation Date.”³³ Section 2.3.1 of the Original GIA grants the Transmission Provider a positive and *permissive* right to terminate an agreement when the project fails to achieve commercial operation three years after its COD.³⁴ On the other hand, section 5.16 of the Original GIA provides interconnection customers three years of positive suspension rights, the purpose of which is to allow interconnection customers to maintain their position in the interconnection queue for three years in the event of unforeseen delays. It is a justifiable interpretation of the contract, and an interpretation apparently shared by the parties of the Original GIA, that these provisions provide two distinct three-year periods, and that MISO may apply its section 2.3.1 termination rights rather than deeming the agreement terminated under section 5.16. As noted above, the current *pro forma* GIA provides suspension rights to interconnection customers only in *Force Majeure* circumstances, and *Non-Force Majeure* instances of failure to achieve Commercial Operation are subject only to the termination provisions in section 2.3.1 under the *pro forma* GIA.

20. As Mankato notified MISO prior to June 1, 2013 that it was ready to proceed with Phase II, MISO, consistent with Commission precedent,³⁵ “followed its process to

³³ MISO Answer at 5 (citing MISO Tariff, Attachment X, Appendix 6 (*pro forma* GIA), section 2.3.1.).

³⁴ Section 2.3.1 of the Original GIA provides that the Transmission Provider *may* terminate the agreement after the three-year period.

³⁵ See *Midwest Indep. Transmission Sys. Operator, Inc.*, 116 FERC ¶ 61,252 at PP 39-42 (noting that a Transmission Owner may reasonably find that developing a new schedule after suspension requires restudy consistent with Sections 6.4, 7.6, and 8.5 of the then-effective GIP); *Midwest Indep. Transmission Sys. Operator, Inc.*, 144 FERC ¶ 61,033 at P 77 (after a suspension period, the Commission found it “appropriate that MISO must consider configurations consistent with a ‘but for’ analysis and which take into account the existing interconnection queue.”).

restudy the project taking into account the state of the queue at the time.”³⁶ Upon restudy, MISO determined that a number of network upgrades would be necessary to accommodate Phase II, and a COD of 2018 was consistent with the timing of other projects that must be in-service for Phase II to proceed. MISO notes in its Deficiency Letter Response that it does not require a project to achieve commercial operation prior to the in-service dates of the full required network upgrades and contingent facilities for the project.³⁷ As MISO states, an interconnection customer may often voluntarily choose to utilize MISO’s limited operations provisions in order to begin operations prior to the completion of other projects’ network upgrades with long-term in-service dates, but MISO does not require interconnection customers to do so.³⁸ Furthermore, we note that the Commission has found that a transmission provider should not force a customer to use a COD that is earlier than the in-service date of the network upgrades that would permit the requested interconnection service.³⁹ According to Exhibit A10 of the Amended GIA, the restudies found that Phase II of the project is conditional upon the completion of certain MISO Multi-Value Projects with in-service dates in 2018.⁴⁰ In this instance, the interconnection customer requested a 2018 COD for the Phase II portion of the GIA, and MISO was agreeable with that date.⁴¹ We therefore accept the Amended GIA with the extension of the COD for Phase II to June 1, 2018.

21. We are not persuaded by AWEA’s and WOW’s assertion that MISO is giving preferential treatment to certain interconnection customers and is failing to follow its tariff and the terms of its standard GIA and GIP. MISO notes that any appearance of differing treatment of Mankato and other customers whose GIAs have been terminated is due to the fact that the Original GIA significantly predates MISO’s recent queue reform efforts⁴² and includes language that does not conform to more recent GIAs.⁴³ For

³⁶ MISO Answer at 8.

³⁷ Deficiency Letter Response at 2.

³⁸ *Id.* at 2-3.

³⁹ *Southwest Power Pool, Inc.*, 147 FERC ¶ 61,201, at P 114 (2014).

⁴⁰ Deficiency Letter Response at 3.

⁴¹ *Id.*

⁴² *Id.* at 6 (citing *Interconnection Queuing Practices*, 122 FERC ¶ 61,252, at P 3 (2008) (noting surging volumes of new generation that were taxing queue management in 2008); *Midwest Indep. Transmission Sys. Operator, Inc.*, 124 FERC ¶ 61,183, at PP 4, 17, 105-111 (2008) (Queue Reform I Order) (responding to FERC’s concern by replacing

instance, while MISO's current process requires that readiness milestones be included in more recent GIAs,⁴⁴ the Original GIA only sets forth the COD for Phase II and did not contain specific Phase II milestones.⁴⁵ This difference is pertinent here because, as noted by MISO, failure to meet readiness milestones has been the basis for recent GIA termination filings identified by AWEA and WOW.⁴⁶ Moreover, as noted above, the *pro forma* GIA's suspension rights section differs from that in the Original GIA, thus it is permissible that MISO's treatment of the Original GIA differs from that of those GIAs negotiated more recently.

22. Furthermore, as both Calpine and MISO point out, the Commission has previously found that Mankato would not be subject to MISO's revised GIP when the revised GIP was adopted.⁴⁷ Specifically, the Commission found that because Mankato's Original GIA had been submitted to the Commission and the necessary interconnection studies had already been completed before implementation of the revised GIP, Mankato would not meet the definition of an "outstanding request" and would not be required to transition to MISO's revised GIP at that time.⁴⁸ However, the Commission also stated "that section 8.7 of the GIP provides that a restudy shall be performed subject to the GIP in effect at the time that an interconnection customer receives notice of a restudy from MISO."⁴⁹ The Commission also stated in the Queue Reform III Order that

a "first-come, first-served" methodology with a "first-ready, first-served" emphasis and accepting limitations on suspension under new GIAs)).

⁴³ *Id.* at 6-8.

⁴⁴ In the Queue Reform I Order, the Commission conditionally accepted revisions to the MISO GIP that provided for "a milestone-based approach that would allow projects to proceed based on readiness, rather than solely on queue position." Queue Reform I Order, 124 FERC ¶ 61,183 at P 16.

⁴⁵ Revised Appendix B of the Amended GIA now includes specific payment milestones and dates for Phase II of the project to reach commercial operation.

⁴⁶ Deficiency Letter Response at 7.

⁴⁷ Deficiency Letter Response at 8 (citing Queue Reform III Rehearing Order, 139 FERC ¶ 61,253 at P 36); Calpine Comments I at 3 n.11; Calpine Comments II at 4.

⁴⁸ Queue Reform III Rehearing Order, 139 FERC ¶ 61,253 at P 36.

⁴⁹ *Id.*

“interconnection customers with ‘outstanding requests’ are required to transition to the revised GIP within a reasonable amount of time not to exceed 90 days,” and “MISO defines ‘outstanding requests’ to include... any interconnection request that is in the process of being studied (including restudies).”⁵⁰ Therefore, because MISO has provided notice of its restudy and completed those studies, the project is now considered an “outstanding request,” is now subject to Queue Reform Order III, and is required to transition to the revised GIP. It appears that MISO has transitioned the Original GIA, and now the Amended GIA, to the revised GIP. In fact, MISO states that it “restudied the project separately, but in accordance with its usual Definitive Planning Phase process, including all study deposit and entry milestone payments,”⁵¹ suggesting that MISO has performed the necessary steps to transition the GIA to the revised GIP.

23. Finally, we disagree with Invenergy that the Commission should require MISO to file additional information to address the questions posed in the Deficiency Letter and find that MISO has provided sufficient information through its Deficiency Letter Response and Answer for the Commission to determine the appropriateness of the proposed amendments to the Original GIA. We also decline to require MISO to demonstrate that it applies its practices consistently and/or has not harmed other generation developers through its practices, as Invenergy requested. Such inquiries are beyond the scope of this proceeding. Similarly, regarding requests for clarification of section 3.3.1 of the MISO GIP, we agree with MISO that section 3.3.1 of the GIP only applies to the COD requested at the application stage and is beyond the scope of this proceeding, which involves modifications to the Original GIA.

The Commission orders:

The Amended GIA is hereby accepted effective October 16, 2014, as requested, as discussed in the body of this order.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.

⁵⁰ Queue Reform III Order, 138 FERC ¶ 61,233 at P 101 (citation omitted).

⁵¹ MISO Answer at 8.

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

*In the Matter of the Petition of
Northern States Power Company to
Initiate a Competitive Resource
Acquisition Process*

) **Docket Nos.: E-002/CN-12-1240**
) **E-002/M-14-788**
) **E-002/M-14-789**
)
) **CERTIFICATE OF SERVICE**

Catherine M. Wood, certifies that on March 11, 2015 she served true and correct copies of the **Supplement of Calpine Corporation** upon the following parties via e-filing and/or U.S. Mail:

ELECTRONIC SERVICE

Person	E-mail Address	Company	Address	Method of Service
David Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500 225 South Sixth Street Minneapolis, MN 55402- 4629	Electronic Service
Ross Abbey	abbey@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 220 St. Paul, MN 55102-1125	Electronic Service
Michael Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th S.,t Suite 211 Minneapolis, Minnesota 55405	Electronic Service
Jorge Alonso	jorge.alonso@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service
Christopher Anderson	canderson@allete.com	Minnesota Power	30 W. Superior Street Duluth, MN 55802-2191	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Julia Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St. St. Paul, MN 55101-2134	Electronic Service
Jessica Antinozzi	go4solarmn@gmail.com		7041 147th Ave. NW Ramsey, Minnesota 55303	Electronic Service
Alison C. Archer	alison.c.archer@xcelenergy.com	Xcel Energy	414 Nicollet Mall, FL 5 Minneapolis, MN 55401	Electronic Service
John Aune	johna@bluehorizonsolar.com	Blue Horizon Energy	171 Cheshire Ln Ste 500 Plymouth, MN 55441	Electronic Service
Thomas Bailey	tbailey@briggs.com	Briggs & Morgan	2200 IDS Center 80 So. 8 th Street Minneapolis, MN 55402	Electronic Service
Kerri Barsness	jkbars@q.com		1454 159th Ave NW Andover, Mn 55304	Electronic Service
Andrew Bahn	Andrew.Bahn@state.mn.us	Public Utilities Commission	121 7th Place E., Suite 350 St. Paul, MN 55101	Electronic Service
Gail Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor Minneapolis, MN 55401	Electronic Service
Ryan Barlow	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street, Bremer Tower, Ste. 1400 St. Paul, MN 55101	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Peter Beithon	pbeithon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade St. Fergus Falls, MN 56538-0496	Electronic Service
Sara Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service
Derek Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service
James J. Bertrand	james.bertrand@stinsonleonard.com	Stinson Leonard Street LLP	150 South Fifth Street Suite 2300 Minneapolis, MN 55402	Electronic Service
Thor Bjork	Thor.S.Bjork@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service
William A. Blazar	bblazar@mnychamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service
Amy Blumenshine	troutblues@aol.com		3156 Elliot Ave. S. Minneapolis, MN 55407	Electronic Service
William Borders	wborders@invenergylc.com	Invenergy LLC	One South Wacker Drive, Suite 1900 Chicago, IL 60606	Electronic Service
Kenneth Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Michael Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5 th Street, #1200 Minneapolis, MN 55402	Electronic Service
Jon Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service
Mark B. Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service
Christine Brusven	cbrusven@fredlaw.com	Fredrikson & Byron, P.A.	200 S. 6 th Street, Suite 4000 Minneapolis, MN 55402-1425	Electronic Service
Michael J. Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave North, Ste 560 Mpls., MN 55401	Electronic Service
Jessica Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service
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
Joel Cannon	jcannon@tenksolar.com	Tenk Solar, Inc.	9549 Penn Avenue S Bloomington, MN 55431	Electronic Service
Tammie Carino	tcarino@GREnergy.com	Great River Energy	12300 Elm Creek Blvd. Maple Grove, MN 55369-4718	Electronic Service
Douglas M. Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
John J. Carroll	jcarroll@newportpartners.com	Newport Partners, LLC	9 Cushing, Suite 200 Irvine, California 92618	Electronic Service
Aakash Chandarana	Aakash.Chandara@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Mpls., MN 55401	Electronic Service
Steve W. Chriss	Stephen.chriss@wal-mart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716- 5530	Electronic Service
Jeanne Cochran	Jeanne.Cochran@state.mn.us	Office of Administrative Hearings	P.O. Box 64620 St. Paul, MN 55164-0620	Electronic Service
John Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service
Kenneth A. Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service
Steve Coleman	scoleman@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Mpls., MN 55406	Electronic Service
Steve Coleman	stevecolemanpuma@gmail.com		231 Winifred St W Saint Paul, MN 55107	Electronic Service
Nathan Criego	nathancriego@yahoo.com		13358 Marigold St Andover, MN 55304	Electronic Service
George Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service
Arthur Crowell	Crowell.arthur@yahoo.com	A Work of Art Landscapes	234 Jackson Ave N Hopkins, MN 55343	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Jill Curran	jcurran@mnychamber.com	Minnesota Waste Wise	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service
David Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service
Lisa Daniels	lisdaniels@windustry.org	Windustry	201 Ridgewood Ave Mpls., MN 55403	Electronic Service
Jerry Dasinger	jerry.dasinger@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service
Jeffrey A. Daugherty	jeffrey.daugherty@xcelenergy.com	Center Point Energy (Xcel Energy)	800 LaSalle Avenue Minneapolis, MN 55402	Electronic Service
Chris Davis	christopher.davis@state.mn.us	Department of Commerce	Suite 500 85 Seventh Place East St. Paul, MN 55101-2198	Electronic Service
Dustin Denison	dustin@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Electronic Service
James Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall Fifth Floor Minneapolis, MN 55401	Electronic Service
Steven Dimmick	sdimmick@wernerelec.com	Werner Electric	7450 95th St South Cottage Grove, MN 55016	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Ian Dobson	ian.dobson@ag.state.mn.us	Attorney General – RUD	Minnesota Street 1400 BRM Tower St. Paul, MN 55101	Electronic Service
Brian Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 56538-0498	Electronic Service
Bill Droessler	bdroessler@iwla.org	Izaak Walton League of America-MWO	1619 Dayton Ave Ste 202 Saint Paul, MN 55104	Electronic Service
Mike Eggl	megggl@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503	Electronic Service
Rebecca Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor Minneapolis, MN 55401	Electronic Service
Betsy Engelking	betsy@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way, Suite 725 Edina, MN 55435	Electronic Service
Oncu Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service
Rick Evans	Rick.Evans@xcelenergy.com	Xcel Energy	404 Nicollet Mall Minneapolis, MN 55401	Electronic Service
John Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303 Minneapolis, MN 55414	Electronic Service
Sharon Ferguson	sharon.ferguson@state.mn.us	Dept. of Commerce	85 7 th Pl. E., Ste. 500 St. Paul, MN 55101-2198	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
John Flumerfelt	jflumerfelt@calpine.com	Calpine Corporation	500 Delaware Avenue Wilmington, DE 19801	Electronic Service
Cathy Fogale	cfogale@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 56537	Electronic Service
Stephen Fogel	Stephen.E.Fogel@XcelEnergy.com	Xcel Energy Services, Inc.	816 Congress Ave, Suite 1650 Austin, TX 78701	Electronic Service
Nathan Franzen	nathan@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service
Amy Fredregill	amy@mrets.org	Midwest Renewable Energy Tracking System, Inc.	1885 University Avenue West, #315 St. Paul, MN 55104	Electronic Service
Lee Gabler	Lee.E.Gabler@xcelenergy.com	Xcel Energy	404 Nicollet Mall Minneapolis, MN 55401	Electronic Service
Hal Galvin	halgalvin@comcast.net	Provectus Energy Development LLC	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service
Gary Garbe	Gary.Garbe@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service
Edward Garvey	garveyed@aol.com	Residence	32 Lawton Street St. Paul, MN 55102	Electronic Service
Kelsey Genung	kelsey.genung@xcelenergy.com	Xcel Energy	414 Nicollet Mall, Fl. 6 Minneapolis, MN 55401	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Benjamin Gerber	bgerber@mnychamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service
Bruce Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 56538-0496	Electronic Service
Travis Germundson	travis.germundson@state.mn.us	Board of Water & Soil Resources	520 Lafayette Road St. Paul, MN 55155	Electronic Service
Craig Gordon	cgordon@invergyllc.com	Invergy LLC	One Wacker Drive Suite 1900 Chicago, IL 60606	Electronic Service
Bill Grant	Bill.Grant@state.mn.us	Minnesota Department of Commerce	85 7th Place East, Suite 500 St. Paul, MN 55101	Electronic Service
Michael Greiveldinger	michaelgreiveldinger@alliantenergy.com	Interstate Power and Light Company	4902 N. Biltmore Lane Madison, WI 53718	Electronic Service
Todd J. Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 55402-1425	Electronic Service
Timothy Gulden	info@winonarenewableenergy.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service
Tony Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service
J Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Sam Hanson	shanson@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 South Eighth Street Minneapolis, MN 55402	Electronic Service
Robert Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service
Jack Hays	jack.hays@westwoodps.com	Westwood Professional Services	7699 Anagram Drive Eden Prairie, MN 55344	Electronic Service
Bill Heaney	billheaney@billheaney.com	IBEW Minnesota State Council	940 44th Ave NE Unite 21067 Columbia Hts, MN 55421-3099	Electronic Service
Brandon Heath	bheath@misoenergy.org	MISO Energy	1125 Energy Park Drive St. Paul, MN 55108-5001	Electronic Service
John Helmers	helmers.john@co.olmsted.mn.us	Olmsted County Waste to Energy	2122 Campus Drive SE Rochester, MN 55904-4744	Electronic Service
Jared Hendricks	hendricksj@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service
Annete Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service
Jessy Hennesy	jessy.hennesy@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service
Lynn Hinkle	lhinkle@mnseia.org	Minnesota Solar Energy Industries Association	2512 33rd Ave South #2 Minneapolis, MN 55406	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Holly Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor Minneapolis, MN 55401	Electronic Service
Margaret Hodnik	mhodnik@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service
Mary Holly	mholly@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service
Michael Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service
Jim Horan	Jim@MREA.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service
David Horneck	david.g.horneck@xcelenergy.com	Xcel Energy	1800 Larimer Street Denver, CO 80202	Electronic Service
Lori Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service
Jan Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service
Tiffany Hughes	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall, Fl 7 Minneapolis, MN 55401	Electronic Service
Anne Hunt	anne.hunt@ci.stpaul.mn.us	City of Saint Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Steve Huso	steve.huso@xcelenergy.com	Xcel Energy	G.O. 7th Floor 414 Nicollet Mall Minneapolis, MN 55401- 1993	Electronic Service
Michael Jacobs	mjacobs@ucsusa.org	Union of Concerned Scientists	2 Brattle Square Cambridge, MA 02138	Electronic Service
Casey Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service
John S. Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service
Tom Jandric	tomejandric@yahoo.com	Sundial Solar	1485 Portland Ave ST. Paul, Minnesota 55104	Electronic Service
Dwight Jelle	dkjelle@gmail.com	Best Power International, LLC	P.O. 5126 Hopkins, MN 55343	Electronic Service
Alan Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service
Eric Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service
Eric Jensen	theericjensen@gmail.com		4421 Bloomington Ave Minneapolis, MN 55407	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Linda Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General – DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 55101-2134	Electronic Service
Richard Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5 th Street Suite 1200 Minneapolis, MN 55402	Electronic Service
Sarah Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service
Larry Johnston	lw.johnston@smmpa.org	SMMPA	500 1st Ave SW Rochester, MN 55902-3303	Electronic Service
Nate Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service
Heidi Joos	sbear175@visi.com		3105 W 40th St Minneapolis, MN 55410	Electronic Service
Clark Kaml	clark.kaml@state.mn.us	Public Utilities Commission	121 E 7th Place, Suite 350 Saint Paul, MN 55101	Electronic Service
Michael Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service
Mark J. Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service
John Kearney	jmkearney@MnSEIA.org	MnSEIA	2512 33rd Ave S Minneapolis, MN 55406	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Brad Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service
Peter Klein	pmk@sppa.com	Saint Paul Port Authority	380 Saint Peter St Ste 850 345 St. Peter Street Saint Paul, MN 55102-1661	Electronic Service
Kerry Klemm	kerry.r.klemm@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service
John Kluempke	jwkluempke@winlectric.com	Elk River Winlectric	12777 Meadowvale Rd Elk River, MN 55330	Electronic Service
Hank Koegel	hank.koegel@edf-re.com	EDF Renewable Eenergy	10 2nd St NE Ste 400 Minneapolis, MN 55413-2652	Electronic Service
Thomas G. Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service
Mara Koeller	mara.n.koeller@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service
Heidi Konynenbelt	hkonynenbelt@otpc.com	Otter Tail Power Company	215 S. Cascade Street, PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service
Jon Kramer	jk2surf@aol.com	Sundial Solar	4708 York Ave. South Mpls., MN 55410	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Ganesh Krishnan	ganesh.krishnan@state.mn.us	Public Utilities Commission	Suite 350121 7th Place East St. Paul, MN 55101	Electronic Service
Michael Krikava	mkrikava@briggs.com	Briggs & Morgan	2200 IDS Center 80 So. 8th St. Minneapolis, MN 55402	Electronic Service
Karen Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55155	Electronic Service
Peder Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service
Deborah Fohr Levchak	dlevchak@bepec.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503-0564	Electronic Service
Amy Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401- 1993	Electronic Service
Douglas Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220 th Street West Farmington, MN 55024	Electronic Service
John Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General – RUD	1400 BRM Tower 445 Minnesota Street St. Paul, MN 55101-2130	Electronic Service
Tim Lindl	tlindl@kfwlaw.com	Keyes, Fox & Wiedman LLP	436 14th St, Ste 1305 Oakland, CA 94612	Electronic Service
Eric Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	P.O. Box 64620 St. Paul, MN 55164-0620	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Michael Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	1111 So. 103 rd St. Omaha, NE 68124-1000	Electronic Service
Matthew P. Loftus	matthew.p.loftus@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service
Bob Long	rlong@larkinhoffman.com	Larkin Hoffman (Silicon Energy)	1500 Wells Fargo Plaza 7900 Xerxes Ave S Bloomington, MN 55431	Electronic Service
Rebecca Lundberg	rebecca.lundberg@powerfullygreen.com	Powerfully Green	11451 Oregon Ave N Champlin, MN 55316	Electronic Service
Casey MacCallum	casey@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave South Mpls., MN 55406	Electronic Service
Paula Maccabee	Pmaccabee@justchangelaw.com	Just Change Law Offices	1961 Selby Ave Saint Paul, MN 55104	Electronic Service
Susan Mackenzie	susan.mackenzie@state.mn.us	Public Utilities Commission	121 7th Place E Ste 350 St. Paul, MN 55101-2147	Electronic Service
Peter Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service
Kavita Maini	kmainsi@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Road Oconomowoc, WI 53066	Electronic Service
Nick Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave. Mpls., MN 55402	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Pam Marshall	pam@energycents.org	Energy CENTS Coalition	823 7 th Street East St. Paul, MN 55106	Electronic Service
Mary Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc.	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service
Daryl Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4 Canada	Electronic Service
Erica McConnell	emcconnell@kfwlaw.com	Keyes, Fox & Wiedman LLP	436 14th Street, Suite 1305 Oakland, California 94612	Electronic Service
Natalie McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste. 201 Saint Paul, MN 55104-1850	Electronic Service
Harvey McMahon	hmcMahon@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service
Connor McNellis	cmcnellis@larkinhoffman.com	Larkin Hoffman Daly & Lindgren Ltd.	8300 Norman Center Drive Suite 1000 Mpls., MN 55437	Electronic Service
John McWilliams	jmm@dairynet.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service
Thomas Melone	Thomas.Melone@AllcoUS.com	MN Go Solar LLC	222 South 9 th Street Suite 1600 Minneapolis, MN 55120	Electronic Service
Brian Meloy	brian.meloy@leonard.com	Leonard, Street and Deinard	150 S. 5 th Street Suite 2300 Mpls, MN 55402	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Philip Miller	pxmiller2@gmail.com		3405 4th Ave South Minneapolis, MN 55408	Electronic Service
David Moe	momentums@aol.com		2825 28th Ave S Mpls., MN 55406	Electronic Service
David Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior Street Duluth, MN 55802-2093	Electronic Service
Andrew Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service
Vernon Morris	vkmooris@netzero.net	Sundial Solar	2409 Aldrich Ave. South Minneapolis, MN 55405	Electronic Service
Dorothy Morrissey	dorothy.morrissey@state.mn.us	Public Utilities Commission	121 7th Place East, Suite 350 St. Paul, MN 55101	Electronic Service
Martin Morud	mmorud@trunorthsolar.com	Tru North Solar	5115 45th Avenue South Mpls., MN 55417	Electronic Service
Tom Murphy	tmmurphymn@gmail.com		15 W. Baker St. Saint Paul, MN 55107	Electronic Service
David W. Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service
Darrell Nitschke	dnitschki@nd.gov	North Dakota Public Service Commission	600 E. Boulevard Avenue, State Capital, 12 th Floor, Dept. 408, Bismarck, ND 58505- 0480	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Michael Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service
Rolf Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21st Ave. S., Ste. 220 Mpls., MN 55407-1229	Electronic Service
Ryan Norrell	mnnorrell@nd.gov	North Dakota Public Service Commission	600 E. Boulevard Ave. State Capital 12 th Floor, Dept. 408 Bismarck, ND 58505-0480	Electronic Service
Bryan Nowicki	bnowicki@reinhardtlaw.com	Reinhart Boerner	22 E. Mifflin Street Suite 600 Madison, WI 53703-4225	Electronic Service
Kate O'Connell	kate.oconnell@state.mn.us	Department of Commerce	Suite 50085 Seventh Place East St. Paul, MN 55101-2198	Electronic Service
Elizabeth Oppenheimer	lizopp@gmail.com		4225 41st Avenue South Mpls., MN 55406	Electronic Service
Carol A. Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service
Nick Paluck	nick.paluck@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Mpls., MN 55401-1993	Electronic Service
Bob Patton	bob.patton@state.mn.us	MN Department of Agriculture	625 Robert Street No. St. Paul, MN 55155-2538	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Gerad Paul	gpaul@minnkota.com	Minnkota Power Cooperative	1822 Mill Road Grand Forks, ND 58208-3200	Electronic Service
Jeffrey C. Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	7301 Ohms Ln Ste 325 Edina, MN 55439	Electronic Service
Joshua Pearson	joshua.pearson@edf-re.com	EDF Renewable Energy	15445 Innovation Drive San Diego, CA 92128	Electronic Service
James Pearson	james.g.pearson@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service
Mary Beth Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	Suite 801 25 West Main Street Madison, WI 53703-3398	Electronic Service
Charlie Pickard	cpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service
Donna Pickard	dpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service
Julie Pierce	jpierce@mnpower.com	Minnesota Power	30 W Superior Street Duluth, MN 55802-2093	Electronic Service
Marcia Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior Street Duluth, MN 55802	Electronic Service
Gayle Prest	gayle.prest@minneapolismn.gov	City of Mpls. Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Electronic Service
Scott Randall	scott@apexsolar.co	Apex Solar	1025 Minnesota Blvd SE St. Cloud, MN 56304	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Mark Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service
Kevin Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E. Exchange St. Suite 206 St. Paul, MN 55101-167	Electronic Service
Enio Ricci	ericci@inveneryllc.com	Invenery LLC	17830 New Hampshire Ave Ste 300 Ashton, MD 20861	Electronic Service
Michelle Rosier	michelle.rosier@sierraclub.org	Sierra Club	2327 E. Franklin Avenue Mpls., MN 55406-1024	Electronic Service
Brian Ross	bross@crplanning.com	CR Planning, Inc.	2634 Vincent Avenue North Mpls., MN 55411	Electronic Service
Craig Rustad	crustad@minnkota.com	Minnkota Power	1822 Mill Road PO Box 13200 Grand Forks, ND 58208-3200	Electronic Service
Robert K. Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service
Eric Sandeen	sandeen@sandeen.net		1722 Scheffer Ave Saint Paul, MN 55116	Electronic Service
Richard Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Suite W2750 St. Paul, MN 55101	Electronic Service
Larry L. Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137 Minneapolis, MN 55402	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Michelle Schroeder	sustainableike@hotmail.com		601 Ridgewood Ave., #103 Minneapolis, MN 55403	Electronic Service
Matthew J. Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129 St. Paul, MN 55116	Electronic Service
Kevin Schwain	Kevin.D.Schwain@xcelenergy.com	Xcel Energy	404 Nicollet Mall Mpls., MN 55401	Electronic Service
Nicole Severson	nicole.severson9@gmail.com		2900 James Ave. South Apt. B Mpls., MN 55408	Electronic Service
Janet Shaddix Elling	jshaddix@janetshaddix.com	Shaddix and Associates	9100 W. Bloomington Fwy, Suite 122 Bloomington, MN 55431	Electronic Service
Gary Shaver	gshaver@silicon-energy.com	Silicon Energy	3506 124th St NE Marysville, WA 98271	Electronic Service
Erin Shea	eshea@silicon-energy.com	Silicon Energy	PO Box 376 8787 Silicon Way Mt Iron, MN 55768	Electronic Service
Doug Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Ave S Mpls., MN 55408	Electronic Service
Mrg Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 57109-8920	Electronic Service
Ken Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service
Beth H. Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Previn Solberg	psolberg1@msn.com		11981 Midway St NE Blaine, MN 55449	Electronic Service
Ron Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service
Sean Stalpes	sean.stalpes@state.mn.us	Public Utilities Commission	121 E. 7th Place, Suite 350 Saint Paul, MN 55101-2147	Electronic Service
Byron E. Starns	byron.starns@stinsonleonard.com	Stinson Leonard Street LLP	150 South 5 th Street Suite 2300 Minneapolis, MN 55402	Electronic Service
Donna Stephenson	dstephenson@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 55369	Electronic Service
James M. Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service
Deb Sundin	deb.sundin@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service
Eric Swanson	eswanson@winthrop.com	Winthrop & Weinstine P.A.	225 S. 6 th Street, Suite 1500 Capella Tower Minneapolis, MN 55402	Electronic Service
Sheila Sweeney	sheilasweeney@mac.com		1559 Fairmount Ave Saint Paul, MN 55105	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Thomas P. Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P.O. Box 1828 Boulder, CO 80306-1828	Electronic Service
Randy Synstelien	rsynstelien@otpc.com	Otter Tail Power Company	215 S Cascade St Fergus Falls, MN 56537	Electronic Service
Richard Szydlowski	rszydlowski@mncee.org	Center for Energy & Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401-1459	Electronic Service
Michael T'Kach	MTKach@enerchange.org	EnerChange.Org	2642 Irving Ave S Minneapolis, MN 55408	Electronic Service
James Talcott	jim.talcott@nngo.com	Northern Natural Gas Company	1111 South 103 rd St. Omaha, NE 68124	Electronic Service
Craig Tarr, PE	ctarr@energyconcepts.us	energy concepts	2349 Willis Niller Dr Hudson, WI 54016	Electronic Service
Darryl Thayer	darylsolar1@gmail.com	DTRenewables LLC	1850 Walnut Apt 4 Lauderdale, MN 55113	Electronic Service
SaGonna Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall, Fl. 7 Mpls, MN 55401	Electronic Service
Steve Thompson	stevet@cmmpa.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service
David Thornton	J.David.Thornton@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service
Douglas Tiffany	tiffa002@umn.edu	University of Minnesota	316d Ruttan Hall 1994 Buford Avenue St. Paul, MN 55108	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Pat Tressler	pat.jcplaw@comcast.net	Paulson Law Office	Ste 325, 7301 Ohms Lane Edina, MN 55439	Electronic Service
Lise Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service
Mouli Vaidyanathan	mouli@mouliengg.com		655 Lexie Court Eagan, MN 55123	Electronic Service
Kari L. Valley	kari.l.valley@xcelenergy.com	Xcel Energy Service, Inc.	414 Nicollet Mall Floor 5 Minneapolis, MN 55401	Electronic Service
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
Kodi Verhalen	kverhalen@briggs.com	Briggs & Morgan	2200 IDS Center 80 South 8 th Street Minneapolis, MN 55402	Electronic Service
Sam Villella	sdvillella@gmail.com		10534 Alamo Street NE Blaine, MN 55449	Electronic Service
Gracie Walovich	gracie@allianceforsolarchoice.com	The Alliance for Solar Choice	595 Market St FL 29 San Francisco, CA 94105	Electronic Service
Roger Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South Walnut PO Box 800 Owatonna, MN 55060	Electronic Service
Gary Waryan	garywaryan@gmail.com		3329 Girard Ave S Mpls., MN 55408	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Carol Westergard	cwestergard@otpc.com	Otter Tail Power Company	215 S Cascade St Fergus Falls, MN 56537	Electronic Service
Paul White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind	618 2nd Avenue SE Mpls., MN 55414	Electronic Service
Scott M. Wilensky	scott.wilensky@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 55401-1993	Electronic Service
Daniel Williams	DanWilliams.mg@gmail.com	Powerfully Green	11451 Oregon Avenue N Champlin, MN 55316	Electronic Service
Samantha Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service
Steven Wishart	steven.w.wishart@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Mpls., MN 55401-1993	Electronic Service
Robyn Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service
Daniel P. Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 – 7 th Place East Suite 350 St. Paul, MN 55101	Electronic Service
Aaron Wood	outcoldcrow@gmail.com	Sundial Solar	350 18th Ave N Hopkins, MN 55343	Electronic Service
Thomas J. Zaremba	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	Suite 801 25 West Main Street Madison, WI 53703-3398	Electronic Service

Person	E-mail Address	Company	Address	Method of Service
Patrick Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett, PA	150 South Fifth Street, #1200 Mpls., MN 55402	Electronic Service

PAPER SERVICE

Person	Company	Address	Method of Service
Kenneth Baker	Wal-Mart Stores, Inc.	2001 SE 10 th St. Bentonville, AR 72716-5530	Paper Service
Jim Borofka	P.M. Bedroom Gallery	805 County Rd 10 NE Blaine, MN 55434	Paper Service
John Doll		10918 Southview Drive Burnsville, MN 55337	Paper Service
Laura Burrington	Minnesota Renewable Energy Society	2928 5th Ave. S. Minneapolis, MN 55408	Paper Service
Carrie Cullen Hitt	Solar Energy Industries Association	505 9th St. NW, Suite 800 Washington, DC 20004	Paper Service
Anne Dejoy	East Side Neighborhood Development Company, Inc.	965 Payne Ave Ste 200 Saint Paul, MN 55130	Paper Service
John Doll		10918 Southview Drive Burnsville, MN 55337	Paper Service
Larry Dolphin	MN Division Izaak Walton League of America	2233 University Ave W Suite 339 Saint Paul, MN 55114	Paper Service
Dan Donkers	Saint Paul - Ramsey County Public Health	Environmental Health Section 2785 White Bear Ave., Suite 350 Maplewood, MN 55109	Paper Service
Brian Droege	Peak Power Minnesota LLC	5030 Nokomis Ave Minneapolis, MN 55417	Paper Service
Kristen Eide Tollefson	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Paper Service
Bryan Gower	APX, Inc.	224 Airport Parkway Suite 600 San Jose, CA 95110	Paper Service
Pete Grills	Citizen User	5414 Ashurst Street Indianapolis, IN 46220	Paper Service
Patrick Hentges	City Of Mankato	P.O. Box 3368 Mankato, MN 560023368	Paper Service
Ashley Houston		120 Fairway Rd Chestnut Hill, MA 2467-1850	Paper Service
Matt Hughes	Cooperative Network	145 University Ave. West Suite 450 St. Paul, MN 55103-7044	Paper Service
Ralph Jacobson	Minnesota Solar Energy Industries Association	2512 33 rd Ave. S. #2 Mpls., MN 55406	Paper Service

Michael Kampmeyer		260 Salem Church Road Sunfish Lake, MN 55118	
Michael Kemper		2242 Matterhorn Ln Saint Paul, MN 55119	Paper Service
Julie Ketchum	Waste Management	20520 Keokuk Ave Lakeville, MN 55044 PO Box 248	Paper Service
John Knofczynski	Heartland Consumers Power District	203 W. Center Street Madison, SD 57042-0248	Paper Service
Mark Lindquist	The Minnesota Project	57107 422 nd Street New Ulm, MN 56073-4321	Paper Service
Joshua Low		2327 E Franklin Ave, Suite 1 Minneapolis, Minnesota 55405-2916	Paper Service
Jennifer Martin	Center for Resource Solutions	1012 Torney Ave, 2nd Floor San Francisco, CA 94129	Paper Service
Dave McNary	Hennepin County DES	701 Fourth Avenue South suite 700 Minneapolis, MN 55415-1842	Paper Service
Ben Nelson	CMPMPA	459 South Grove Street Blue Earth, MN 56013	Paper Service
Ryan Norrell	North Dakota Public Service Commission	600 E. Boulevard Avenue State Capital, 12 th Floor Dept. 408 Bismarck, ND 58505-0480	Paper Service
Russell Olson	Heartland Consumers Power District	PO Box 248 Madison, SD 57042-0248 PO Box 167	Paper Service
William Pickrell	North American Hydro	116 State Street Neshkoro, WI 54941	Paper Service
John C. Reinhardt	Laura A. Reinhardt	3552 26th Avenue South Minneapolis, MN 55406	Paper Service
Dean Sedgwick	Itasca Power Company	PO Box 457 Bigfork, MN 56628-0457	Paper Service
Steve Seidl	EnerChange	23505 Smithtown Rd Ste 280 Shorewood, MN 55331	Paper Service
Greg Topel	International Brotherhood of Electrical Workers	503 E 16th St Hibbing, MN 55746	Paper Service
Darryl Tveitbakk	Northern Municipal Power Agency	123 Second Street West Thief River Falls, MN 56701	Paper Service
Jonathan G. Zierdt	Greater Mankato Growth	1961 Premier Dr Ste 100 Mankato, MN 56001	Paper Service

/s/ Catherine M. Wood
CATHERINE M. WOOD