

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

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

**In the Matter of the Petition of Xcel Energy
For Approval of the Acquisition
Of Wind Energy**

DOCKET NO. G-002/M-16-777

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

The Office of the Attorney General—Residential Utilities and Antitrust Division (“OAG”) submits the following Comments in response to the petition of Northern States Power Company, doing business as Xcel Energy, for approval by the Minnesota Public Utilities Commission (“Commission”) of its 2016 Wind Acquisition Petition. On March 16, 2017, Xcel Energy filed a supplement to its October 24, 2016 petition in this docket, asking for approval of a 1,550 MW portfolio of wind, with 750 MW of self-build projects and 800 MW of projects selected in the recently-completed Request for Proposal (RFP) process. On March 20, 2017, the Commission issued a Notice of Comment Period (which was supplemented on April 7, 2017) that requested comment on a number of issues. These Comments will address one of these issues: whether the Commission should “authorize an aggregate, symmetrical cost cap for the four self-build project portfolio?”¹ For the reasons set forth below, the Commission should decline to adopt the cost recovery mechanism proposed by the Company and instead adopt a hard cost cap on an individual project basis with a 95/5 shared savings mechanism that will balance the Company’s incentives without harming ratepayers.

¹ Commission’s April 7, 2017 Revised Notice of Comment Period on Petition.

I. BACKGROUND

The Commission's January 11, 2017 Order in Xcel's 2016–2030 Integrated Resource Plan docket established that “it is reasonable [for Xcel] to acquire at least 1000 MW of wind by 2019.”² In addition, the Commission found that “additional acquisitions may be approved” upon examination of “evidence such as price, bidder qualifications, rate impact, transmission availability[,] and location”³ The Commission ordered the Company to undergo the two-track bidding process proposed by Xcel, with the “modified Track 2” process utilized for any bids made by the Company, and did not make a determination on the “proper mix of purchased power and Company-owned resources,” which will be addressed in the present docket.⁴ In both the months prior to and subsequent to the Order, Xcel took several actions that resulted in its request for adding 1,550 MW of wind power to its stable of generation.

In late August of 2016, the Company created two new legal entities: Nicollet Holdings, LLC and Capital Services, LLC.⁵ Nicollet Holdings is a wholly-owned intermediate holding company subsidiary and Capital Services is a “special purpose service company” that was “formed for the purpose of procuring and reselling ‘safe harbor’ wind generation electrical equipment to the Company and other Xcel Energy Operating Companies.”⁶ On September 15, 2016, Capital Services entered into a Master Supply Agreement (“MSA”) with Vestas, a wind supplier, for \$200 million of wind generation equipment capable of providing for 2,500 MW of

² *In the Matter of Xcel Energy's 2016–2030 Integrated Resource Plan*, Docket No. E-002/RP-15-21, Order Approving Plan with Modifications and Establishing Requirements for Future Resource Plan Filings at 7 (Jan. 11, 2017).

³ *Id.*

⁴ *Id.* at 11.

⁵ See *In the Matter of the Petition of Northern States Power Company for Approval of a Sale of Components Agreement with Capital Services, LLC*, Docket No. E-002/AI-17-215, Petition at 5–7 (Mar. 17, 2017).

⁶ *Id.* at 6.

wind generation with 100 percent Production Tax Credit (“PTC”) eligibility for projects placed in service by the end of 2020.⁷

On September 22nd, the Company issued an RFP for up to 1,500 MW of nameplate wind capacity through either Power Purchase Agreements (“PPA”) or Build-Own-Transfer (“BOT”) agreements. Bids were due on October 25, 2016. Xcel received proposals from 17 bidders for 48 different wind projects under 95 ownership proposals.⁸ In total, nearly 10,000 MW of wind resources were proposed under the RFP process. Following receipt of the bids, the Company created a shortlist of projects and began to negotiate with bidding companies.

On October 24, 2016, a day before the RFP bid due date for outside projects, Xcel submitted the proposed self-build projects at issue in this docket. The Company proposed four self-build projects that together represent 750 MW of new generation capacity. Xcel prefers the four projects to be considered as one aggregate “Wind Portfolio” rather than as individual projects. The Company prepared the cost estimates for each of its four self-build projects with the assistance of “established [Balance of Plant] contractors” and noted that it would issue a “firm price RFP for BOP construction” for its “Wind Portfolio” after completion of preliminary design and upon approval by the Commission.⁹

On March 16, 2017, the Company filed a supplement announcing its plan to acquire 1,550 MW of wind resources. Under its proposal, the Company ultimately seeks to own 1,150 MW of new wind resources (via self-build and BOT structures) and acquire 400 MW of wind

⁷ *Id.* at Attachment A.

⁸ Xcel’s Jan. 4, 2017 Informational Letter-RFP Bids Received at 1.

⁹ *See* Xcel’s October 24, 2016 Petition at 23; *but see* Xcel’s March 16, 2017 Supplement at 24 (noting that the Company issued a firm-price RFP February 15, 2017, with bids due March 27, 2017).

resources via PPA. The supplement reflects Xcel's previously-stated desire to self-build half of the new wind resources and increase the Company's ownership of assets.¹⁰

The Company proposed what it called an aggregate, symmetrical cost cap whereby the project price (inclusive of AFUDC) for its self-build projects would be fixed at [TRADE SECRET BEGINS [REDACTED] TRADE SECRET ENDS].¹¹ Under Xcel's proposal, the entire amount of its October 2016 estimates would be recovered from ratepayers. The Company's argument in favor of its proposal is that ratepayers would not be asked to provide additional revenue if actual costs exceed projections. Likewise, under the Company's proposal, the Company's shareholders would benefit—at the expense of ratepayers—to the extent that actual costs come in under-budget.

The next section will analyze Xcel's proposal, describe why the Commission should decline to adopt the mechanism as proposed, and propose a mechanism that balances the Company's interests with the interests of its ratepayers.

II. ANALYSIS AND RECOMMENDATIONS

These Comments focus solely on the mechanism proposed by the Company to recover costs associated with its self-build projects. What action the Commission should take regarding the acquisition of the entire 1,550 MW slate of wind resources or whether it is reasonable for the Company to pursue 750 MW of self-build projects within that total, are not addressed here. The analysis below will instead focus on why it is unreasonable for Xcel to receive advance approval for guaranteed cost recovery for the aggregated, projected costs of four discrete projects.

¹⁰ See, e.g., *In the Matter of Xcel Energy's 2016–2030 Upper Midwest Resource Plan*, Docket No. E002/RP-15-21, Supplemental Comments at 34–40 (Jan. 29, 2016) (noting that utility ownership of new renewable resources is part of its “overall business plan”).

¹¹ Xcel's October 24, 2016 Petition at 3.

A. THE COMMISSION SHOULD DECLINE TO ADOPT XCEL'S PROPOSED COST RECOVERY MECHANISM.

The Commission should decline to approve Xcel's proposed cost recovery mechanism at this time. First, the Company has provided insufficient to justify advance recovery, even if such a mechanism were reasonable. Second, the Company's proposed aggregation of projected costs for its four discrete self-build projects benefits its shareholders, but harms ratepayers. Third, the prior docket cited by the Company in support of its cost recovery proposal should be given little, if any, precedential weight due to significant differences between the dockets. Finally, the Company's proposal raises significant public interest concerns that prevent its adoption by the Commission.

1. Xcel has not provided sufficient detail to support guaranteed recovery of projected costs.

Even if advanced, guaranteed recovery of estimated project costs were reasonable, the Commission lacks the record upon which to make such a significant finding. The Commission should decline to adopt Xcel's current cost recovery mechanism that would allow it guaranteed recovery, of **TRADE SECRET DATA BEGINS [REDACTED] TRADE SECRET DATA ENDS]** based on estimates of projects that are not expected to be in service until late-2019 at the earliest. By the time of the earliest in-service date, the Company's preliminary estimates would be three years old. It would be unreasonable for the Commission to approve guaranteed recovery of such a massive outlay of ratepayer resources years before they will be put into service.

Xcel has not yet requested recovery of costs associated with its four self-build projects, nor has it provided sufficient details of its estimated costs, but it nonetheless seeks advance approval of the entirety of the aggregate projected costs for the four discrete projects it

proposes.¹² The four projects—Foxtail, Blazing Star I, Blazing Start II, and Freeborn—were developed internally by Xcel with the help of unnamed outside contractors and were presented to the Commission in an October 2016 filing, a day before RFP bids were due from third-party developers. The Company stated that this schedule is in following with the process approved by the Commission in Xcel’s IRP docket. In Xcel’s March 16, 2017 supplemental filing, the Company made no changes to the cost estimates for the four self-build projects from the October filing, although it did make minor changes to certain calculations of levelized cost.¹³ Project-related revenues would be recovered in a future proceeding, most likely through the Renewable Energy Standard (“RES”) rider.¹⁴

At the time it requests cost recovery, through base rates or a rider, the Company will have an opportunity to earn a reasonable return upon its investment based on costs that are actually incurred. For that reason, and because Xcel’s current request is based on projected cost estimates, the Commission should not approve a cost recovery mechanism at this time if it effectively locks in the amount that ratepayers will be required to fund in the coming years. If the Commission desires to select a cost recovery structure to be used in the future for these four, discrete self-build projects, it should not approve the mechanism proposed by Xcel. The next section will demonstrate why its mechanism is not in the public interest.

¹² “[W]e believe it is more beneficial for our customers that the four projects move forward as a portfolio. We therefore propose to limit our cost recovery to an aggregate capital cap (including AFUDC) . . . for the entire Wind Portfolio.” Xcel’s Oct. 24, 2016 Petition at 3.

¹³ Xcel’s March 16, 2017 Supplement at 19.

¹⁴ *Id.* at 5.

2. The Company's aggregation of early estimates of project costs for cost recovery purposes reduces its incentive to maximize cost savings.

Xcel seeks a cost recovery mechanism for its “Wind Portfolio” that unreasonably aggregates four discrete self-build projects and creates, essentially, a guaranteed, ratepayer-funded cache that the Company could use amongst its projects to, in its words, “realize efficiencies.”¹⁵

The Company's insistence that its four self-build projects be considered as an aggregate “Wind Portfolio” distinguishes these self-build projects from the RFP-generated projects also being considered by the Commission. This may make it difficult for the Commission to assess the reasonableness of the self-build projects on a stand-alone basis, especially as compared to the stand-alone RFP projects to which the Company seeks favorable comparison. But aggregation may also be harmful to ratepayers in the implementation of the Company's proposed cost recovery mechanism because it weakens the Company's incentive to maximize cost efficiencies for each individual project. For example, if the Company experiences cost overruns on one project, it could raid the cost savings from another project to fund the overruns. With a guaranteed revenue stream for aggregate project estimates, the Company can avoid having its shareholders pay for an individual project's cost overruns and instead ask its ratepayers to fund overruns. This increases the likelihood that its shareholders, and not its ratepayers, will be the beneficiaries of the “realized efficiencies” the Company claims its aggregation produces.

3. The Commission should not place significant weight upon the cost recovery mechanism cited by the Company.

In its October 24, 2016 Petition, the Company supports its proposed cost recovery mechanism with a footnote to a previous docket, its 2012 resource acquisition docket (E/002-

¹⁵ Xcel's Oct. 24, 2016 Petition at 2.

CN-12-1240).¹⁶ In the 2012 docket, through a years-long process, the Commission sought bids from parties—including Xcel—to address potential resource needs. The Commission ultimately selected several projects, including a project proposed by Xcel to build a combustion turbine generator at its existing Black Dog facility. Although Xcel had initially proposed a performance-based cost recovery mechanism,¹⁷ the Commission ultimately adopted a similar mechanism to the one Xcel now proposes.¹⁸

There are significant differences between the 2012 docket and the current docket that ultimately mean that the Commission should give this particular precedent little weight. Xcel’s 2012 project—Black Dog Unit 6—was an individual project that was subject to considerable record development through a contested case proceeding. It was compared to other individual projects and selected by the Commission based upon that comparison. In this case, however, the Company seeks approval of a cost recovery mechanism for the total cost of four discrete projects that have undergone only preliminary¹⁹ cost estimate work by the Company with help from outside contractors. This distinction is significant because it appears that the Commission in the 2012 docket sought to treat Xcel’s bid from the outset the same as it treated other entities’ bids. After narrowing down potential bids, the Commission instructed the Company to negotiate cost terms that contained an acknowledgment that “for purposes of cost recovery, each bidder will be

¹⁶ *Id.* at fn. 3.

¹⁷ *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Competitive Resource Acquisition Proposal and Certificate of Need*, Docket No. E-002/CN-12-1240, Direct Testimony of James R. Alders at 2–6 (Sep. 27, 2013).

¹⁸ *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Competitive Resource Acquisition Proposal and Certificate of Need*, Docket No. E-002/CN-12-1240, Order Denying Petitions for Reconsideration, Reconsidering Prior Order, and Revising Price Term at 3 (April 16, 2015). The proposal that was ultimately selected was proposed by the Department’s witness. *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Competitive Resource Acquisition Proposal and Certificate of Need*, Docket No. E-002/CN-12-1240, Rebuttal Testimony of Christopher J. Shaw at 3 (Oct. 18, 2013).

¹⁹ See Xcel’s Oct. 24, 2016 Petition at 23 (noting that preliminary engineering was not yet complete and that an RFP for BOP construction contracts would not be issued until the “Wind Portfolio” received Commission approval).

held to the prices and terms used to evaluate its bid.”²⁰ Here, Xcel has self-selected its self-build projects and has performed the culling of RFP-based bids without Commission oversight.

While it may have been reasonable for the Commission in the 2012 resource acquisition docket to approve the type of cost recovery mechanism Xcel now proposes, the 2012 docket reflects a very different set of facts and procedural posture when compared to the current docket. There, the Commission shaped the bid selection process. Here, the Company has proposed a “Wind Portfolio” based upon its long-stated preference²¹ to own half of the renewable additions it makes to its system and asks for Commission approval of those resources. There, the bids were subjected to a rigorous contested case process and a very substantial process. Here, the Company relies upon projected estimates that contain little detail.

The differences between these two dockets lead to the conclusion that the cost recovery mechanism that was ultimately approved in the 2012 resource acquisition docket did not establish an applicable precedent upon which the Commission can rely in this docket. The next section will describe why Xcel’s proposed cost recovery mechanism raises broader public interest and policy concerns.

4. Xcel’s proposed cost recovery mechanism raises broader public interest and policy concerns.

The Company’s proposed cost recovery mechanism also raises significant concerns, independent of concerns described above. First, the Company’s request is similar to the terms contained in a type of contract, whereby a fixed price is agreed to, regardless of the costs incurred. While such a contract may be appropriate in some situations, its use in this regulated

²⁰ *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Competitive Resource Acquisition Proposal and Certificate of Need*, Docket No. E-002/CN-12-1240, Order Directing Xcel to Negotiate Draft Agreements with Selected Parties at 35 (May 23, 2014).

²¹ *2016–2030 Upper Midwest Resource Plan*, Docket No. E002/RP-15-21, Xcel Supplement—Current Preferred Plan at 34 (Jan. 29, 2016).

context is inappropriate. Second, the Company's proposed cost recovery mechanism exacerbates existing informational asymmetries between the Company and other parties, which can hinder effective review by regulators. Finally, the proposed cost recovery mechanism unreasonably shifts certain risks onto Xcel's ratepayers.

One perspective from which to view Xcel's proposed cost recovery mechanism is to note its similarity to firm fixed price contracts ("FFP"). Parties entering into a FFP contract agree upon a fixed price for a good or service regardless of the actual costs that are incurred during performance of the contract. This type of contract generally places risk upon the performing party and incentivizes that party to prioritize efficient and cost-effective performance. Such a contract, however, also results in the greatest potential for profit by the performing party.²² Such a construct may have applicability in certain business scenarios, but it is inappropriate to utilize it in the context of an advance determination of cost recovery by a vertically-integrated utility because it obligates ratepayer funding of costs that might not be incurred by the utility.

Second, the informational imbalance between Xcel and regulators in this case is stark. This imbalance could serve to overwhelm the benefits conferred traditionally by FFP-like pricing structures, which would directly harm ratepayers. FFP contracts may be appropriate in situations where all parties to the proposed transaction possess comprehensive information regarding the proposal and significant expertise to evaluate the information provided in the proposal, including significant experience regarding similar proposals. This information and expertise should include things like technical characteristics, costs, and risks. In this case, Xcel possesses significantly more information and expertise about these projects and about the development of cost estimates than do its regulator or the reviewing parties. For instance, it is *unlikely* that the

²² See Steven W. Feldman, Government Contract Handbook § 4:18 (4th ed.) (Oct. 2016).

Company would propose advance recovery of an amount based on a preliminary cost estimate that it did not reasonably expect to be able to meet—and likely fall under. It is difficult, if not impossible, for outside parties to fully understand and quantify this dynamic, but because of this asymmetry, Xcel’s FFP-like cost recovery proposal presents unreasonable terms that ratepayers are being asked to bear.

Finally, it is unreasonable to approve the cost recovery mechanism proposed by the Company because its “symmetrical” structure masks the shifting of risk onto ratepayers. It is true that, under Xcel’s proposal, if the Company incurs *total* actual costs for its “Wind Portfolio” in excess of its aggregated cost estimates for the four self-build projects, then the Company would presumably not request direct recovery of the excess costs. But it is also true that the Company would profit if it was able to manage its overall budget for four projects to achieve savings. This may be a reasonable approach for two sophisticated business entities, given the information symmetry and risk profiles of those hypothetical entities, but it would result in unreasonable ratepayer harm if it is allowed in this docket. The Company has itself produced the estimated costs of which it seeks recovery. And it is in the process of negotiating with contractors to complete the self-build projects.²³ If it is provided certainty in the revenues it will be able to receive at this point in the process, it will ensure that its shareholders will benefit to the detriment of its ratepayers. In other words, guaranteeing cost recovery for projected costs now could encourage the Company to drive down its actual costs to the benefit of its shareholders, not its ratepayers. Ratepayers would be left on the hook to fund the entire (estimated) costs associated with the self-build projects.

²³ Xcel’s March 16, 2017 Supplement at 24.

For the reasons stated above, the Company's symmetrical cost recovery proposal is unreasonable. If the Commission wishes to approve a mechanism at this time, it should adopt the proposal described in the next section: a hard cap for individual project costs with a shared savings mechanism. This alternative provides a better balance between encouraging cost-effectiveness and ensuring that ratepayers pay for only what is reasonable.

B. IF THE COMMISSION CHOOSES TO APPROVE A COST RECOVERY MECHANISM AT THIS TIME, IT SHOULD ADOPT A MECHANISM THAT PROVIDES RATEPAYER BENEFITS.

As stated above, the Commission should not approve the cost recovery mechanism proposed by Xcel. Instead, the Commission should adopt a cost recovery mechanism, either now or in a future proceeding, that better balances the interests of ratepayers. There are a number of cost recovery structures that could be implemented in this case, but the most reasonable option would be to adopt a mechanism that shares project savings with ratepayers.

In this scenario, the Company would be held to its proposed project estimates—*on an individual project basis*—for cost recovery purposes. It would not be able to recover any amount for any project where actual costs exceed its October 2016 project estimate, which continues to be the most recent cost estimate in the record, and the estimate upon which Xcel itself premises approval of total cost recovery. If the Company incurred actual costs for an individual project less than its October 2016 estimate, then it would be able to keep a portion of the savings, but must give the rest back to ratepayers.²⁴ A reasonable allocation would be to return 95 percent of cost savings to ratepayers and allow the utility to keep 5 percent of its cost savings. Such a mechanism would maintain the Company's incentive to come in under budget and provide the

²⁴ It is impossible to say with precision how this would occur until the Company outlines its actual cost recovery plans.

majority of the benefits to its ratepayers, not its shareholders. This option could be described as a hard cap on individual project costs with a 95/5 shared savings mechanism.

A similar mechanism was recently approved for Xcel's Colorado utility, which sought approval of a 600 MW wind project.²⁵ In that docket, the Company agreed, as a result of settlement negotiations, to share the vast majority (82.5 percent) of capital cost savings with ratepayers and to establish a performance metric to determine long-term sharing between the Company and its ratepayers.²⁶

Designing a properly-functioning mechanism via comments may not result in the most effective balancing of the web of interests at stake in this proceeding. For that reason, the Commission may want to approve the concept described above, but provide additional opportunities to construct the details of a hard cap with a shared savings component. There are other reasons why the development of this mechanism can wait: the early stage of the proceedings in this docket, the fact that Xcel has not yet sought cost recovery, and the complex interests that any cost recovery mechanism must balance. Finally, when the Commission does seek to design the cost recovery mechanism, it is important to ensure that the Company is not allowed to be the sole, or even the main designer. At that time, it may be reasonable to delegate the design of the mechanism to an independent, expert party.

²⁵ *In the Matter of the Application of Public Service Company of Colorado for Approval of the 600 MW Rush Creek Wind Project Pursuant to Rule 3660(H)*, CO PUC Docket No. 16A-0117E, Non-Unanimous Settlement Agreement at 16–17 (Sep. 2, 2016).

²⁶ The cost recovery cap for the Rush Creek wind project in Colorado was approximately \$1.1 billion in capital costs, inclusive of AFUDC and based upon the total cost of the projects. *Id.* at 16. The settlement agreement does not include a discussion on how parties reached the specific percentages of sharing between the Company and ratepayers.

III. CONCLUSION

Xcel has proposed to add 1,550 MW of wind resources to its system in this docket, and 750 MW of those resources are proposed to be self-built by the Company. These Comments do not take a position on the reasonableness of the total amount of wind resources Xcel seeks to add, nor do they take a position on the reasonableness of its self-build “Wind Portfolio.” Rather, these Comments focus on the Company’s proposal to be granted guaranteed cost recovery from ratepayers of the entire amount of projected project costs. The Commission should not approve such a mechanism. Instead, the Commission should approve a hard cap, on an individual project level, with a 95/5 shared savings mechanism for cost savings. Such a mechanism would encourage the Company to minimize its costs while allowing ratepayers, not shareholders, to benefit from the resulting savings.

The Commission should approve this mechanism and retain an independent consultant to design the details, with parties' input.

Dated: May 1, 2017

Respectfully submitted,

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State of Minnesota

s/ **Joseph A. Dammel**

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May 1, 2017

Mr. Daniel Wolf, Executive Secretary
Minnesota Public Utilities Commission
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RE: *In the Matter of the Petition of Xcel Energy for Approval of the Acquisition of Wind Energy*
Docket No. E002/M-16-777

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matter please find the Public Version of *Initial Comments of the Office of the Attorney General*.

By copy of this letter, all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

s/ **Joseph A. Dammel**

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Enclosures

AFFIDAVIT OF SERVICE

RE: *In the Matter of Xcel Energy for Approval of the Acquisition of Wind Energy*
Docket No. E002/M-16-777

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, RACHAEL BERNARDINI, hereby state that on this 1st day of May, 2017, I filed with eDockets the **Public Version of the *Initial Comments of the Office of the Attorney General*** and served the same upon all parties listed on the attached service list by email, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

s/ **Rachael Bernardini**
RACHAEL BERNARDINI

Subscribed and sworn to before me
this 1st day of May, 2017.

s/ **Patricia Jotblad**
Notary Public

My Commission expires: January 31, 2020

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Ed	Ehlinger	Ed.Ehlinger@state.mn.us	Minnesota Department of Health	P.O. Box 64975 St. Paul, MN 55164-0975	Electronic Service	No	OFF_SL_16-777_M-16-777
Kristen	Eide Tollefson	N/A	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Paper Service	No	OFF_SL_16-777_M-16-777
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_16-777_M-16-777
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Dave	Frederickson	Dave.Frederickson@state.mn.us	MN Department of Agriculture	625 North Robert Street St. Paul, MN 551552538	Electronic Service	No	OFF_SL_16-777_M-16-777
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Steve	Taylor	steve.taylor@co.sherburne.mn.us	Sherburne County	13880 Hwy 10 Elk River, MN 55330	Electronic Service	No	OFF_SL_16-777_M-16-777

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Erin	Vaughn	evaughn@shb.com	Shook, Hardy & Bacon L.L.P.	2555 Grand Blvd. Kansas City, MO 64108	Electronic Service	No	OFF_SL_16-777_M-16-777
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