

October 5, 2020

VIA ELECTRONIC FILING

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

Re: Response to Public Comments
In the Matter of the Applications of Elk Creek Solar, LLC for a Certificate of Need
and a Site Permit for the up to 80 MW Elk Creek Solar Project in Rock County,
Minnesota

MPUC Docket Nos. IP-7009/CN-19-351 and IP-7009/GS-19-495
OAH Docket No. 71-2500-36619

Mr. Seuffert:

Elk Creek Solar, LLC (“Elk Creek”) submits these responses to issues raised by the written public comments presented by the Minnesota Department of Natural Resources (“MDNR”) in its July 21, 2020 comments, LiUNA! Minnesota & North Dakota in its July 24, 2020 comments, International Union of Operating Engineers, Local 49 in its July 27, 2020 comments, the Minnesota Department of Agriculture (“MDA”) in its August 10, 2020 comments, Mr. Jeff Westgor in his August 10, 2020 comments, Chambers Family Farms, LLC in its August 10, 2020 comments, Mr. Steve Schneiderman in his August 10, 2020 comments and oral public comments raised at the virtual public hearing held on July 23, 2020 for the solar energy generating system with up to 80-megawatt (MW) alternating current (AC) nameplate capacity, in Vienna Township, Rock County, Minnesota (the “Project”).

Below is a summary of the comments received and Elk Creek’s responses to each set of comments:

1. MDNR commented and provided redlined permit language regarding their collaboration with the Department of Commerce, Energy Environmental Review and Analysis (“DOC-

EERA”) and the Minnesota Board of Soil and Water Resources (“BWSR”) on Section 4.3.8 Beneficial Habitat of the sample Site Permit.¹

Regal appreciates MDNR’s comment and is amenable to the modified permit language. Regal supports the addition of MDA as an agency that Elk Creek should coordinate with as it develops its Vegetation Management Plan (“VMP”). Elk Creek met with the MDNR, MDA and DOC-EERA on two occasions after the close of the public comment period to discuss the modified permit language proposed by the MDNR comment letter as well as Elk Creek’s VMP and the potential for co-locating agricultural uses as a vegetation management tool as part of the VMP. Elk Creek is currently revising its VMP to include grazing and haying as possible solutions that could achieve the vegetation management requirements set forth in the modified Section 4.3.8 of the draft Site Permit. Additional discussion regarding Elk Creek’s potential use of co-located grazing and haying is discussed below in response to the MDA comment letter.

2. Mr. Jason A. George, Business Manager / Financial Secretary, International Union of Operating Engineers, Local 49, submitted a comment letter on July 27, 2020 in support of the proposed facility²

Elk Creek appreciates the support of Mr. George and the International Union of Operating Engineers, Local 49. Elk Creek has agreed, as a requirement of its power purchase agreement with Xcel Energy that was approved by the Commission in eDocket E002/M-19-568, to certify that all “Construction Craft Employees” used in the construction of the Project were covered by a collective bargaining agreement, which will require payment of Minnesota prevailing wage to construction personnel. Moreover, any non-union workers used for the construction of the Project, not covered by a collective bargaining agreement, will be paid Minnesota prevailing wage rates. Elk Creek’s wage commitments in the power purchase agreement will ensure that all construction personnel will receive Minnesota prevailing wage rates, which are the highest wage paid to employees in the same position in Minnesota. As Mr. George points out in his comment letter, Elk Creek’s commitment will help to ensure the economic benefits of the Project will go back into Minnesota communities and the local region.

3. LiUNA! Minnesota & North Dakota (“LiUNA!”) provided a comment letter dated July 24, 2020 in support of the proposed facility.³

¹ MDNR Comments, July 21, 2020, eDocket ID No. 20207-165148-01.

² Mr. Jason A. George, Business Manager / Financial Secretary, International Union of Operating Engineers, Local 49 Comments, July 27, 2020, eDocket ID No. 20207-165315-01.

³ LiUNA! Minnesota & North Dakota Comments, July 24, 2020, eDocket ID Nos. 20207-165258-01, 20207-165258-02.

Elk Creek appreciates the support of LiUNA!. Elk Creek agrees that the Project will have significant positive economic benefits for the local communities, including wages for construction workers and production tax revenues.

4. MDA submitted a comment letter on August 10, 2020 supporting Elk Creek's request to incorporate perennial agricultural crops in an alternative Vegetation Management Plan.⁴

Elk Creek appreciates the comments of MDA and its support of Elk Creek's efforts to explore an alternative VMP that would incorporate perennial agricultural crops that can be harvested and/or used for grazing by local farmers. Elk Creek also appreciates that MDA did not oppose the Project or its siting on prime agricultural land. Prior to submitting its Site Permit Application to the Commission, Elk Creek developed its Agricultural Impact Mitigation Plan in coordination with MDA (Appendix C to Elk Creek's Site Permit Application)⁵. During those discussions, Elk Creek and MDA discussed the possibility of co-locating agricultural practices at the Project to minimize the displacement of agricultural operations due to the Project.

As indicated above, Elk Creek met with MDA, MDNR, and DOC-EERA regarding opportunities to explore an alternative VMP that would incorporate perennial agricultural crops. Elk Creek has pointed out in the record for these dockets that local agricultural producers have approached Elk Creek to discuss opportunities for grazing or haying all or a portion of the Project after construction. During discussions with the agencies, the MDNR indicated that a diverse, native perennial seed mix comprised of grasses and forbs can be developed to satisfy the requirements set forth in the newly proposed Section 4.3.8 of the draft site permit while also allowing opportunities for haying and/or grazing as strategies to manage the perennial vegetation as both beneficial habitat and an agricultural resource for local farmers. Elk Creek is currently working with the MDNR to develop a perennial, native seed mix that can be managed by mowing, haying or grazing. Elk Creek has preliminarily determined that the perennial vegetation planted in the portion of the Project within the panel arrays could be grazed by sheep and the perennial vegetation planted around the periphery of the panel arrays and in other open areas could potentially be hayed and harvested for consumption by farm animals. Elk Creek is in the process of identifying and determining whether local farmers have the appropriate equipment, sheep flock, and insurance to accomplish vegetation management on all or a portion of the site. In the absence of having a definitive partnership for grazing or haying activities, the MDNR has indicated that standard mowing management activities could also be utilized in all areas as a vegetation management tool.

⁴ MDA Comments, August 10, 2020, eDocket ID No. 20208-165739-01.

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<https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={407F2C6D-0000-C18D-815A-BCD1A99E162B}&documentTitle=20199-155860-06>

Elk Creek is currently revising its VMP to include mowing, grazing and haying as possible solutions that could achieve the vegetation management requirements set forth in the modified Section 4.3.8 of the draft site permit. Under no circumstance would grazing or haying occur until year 2 or 3 of the vegetation establishment cycle to allow adequate time for the native, perennial vegetation to become established. Therefore, Elk Creek would not need local farmers to graze or hay the Project until 2023 or 2024 at the earliest. Providing optionality for vegetation management at the site would allow for flexibility during Project operations if local farmers do not have the equipment or are not otherwise available to accomplish grazing or haying at the site and would still allow Elk Creek to meet its vegetation management objectives through traditional mowing activities.

Elk Creek does not believe any further revisions to the draft site permit are required to accommodate an alternative VMP that would allow grazing or haying as vegetation management strategies. Elk Creek will continue to revise and develop its VMP in coordination with MDNR, BWSR, MDA and DOC-EERA.

5. Mr. Jeff Westgor, submitted a comment letter on August 10, 2020 in support of the proposed facility.⁶

Elk Creek appreciates the support of Mr. Westgor, one of the landowners participating in the Project. Mr. Westgor chose to participate in the Project, in part, because of Geronimo's (as the developer of the Elk Creek Project) track record in renewable projects and because some of the revenue from the Project will benefit the local economy. He also noted Xcel Energy's mandate for renewable energy, carbon emission reductions and the high solar resource in the area were factors in determining whether to participate in the Project. Mr. Westgor acknowledged that his farming tenant would be displaced from using the land for farming, but that he offered the land to his tenant before entering into an agreement with Elk Creek, and the tenant declined and has other land he farms. Elk Creek respects the decisions of its landowners and the choices they make on how best to utilize their agricultural land. In this case, Mr. Westgor voluntarily chose to use his land for electricity production rather than production of a more traditional agricultural crop. He made that decision after carefully weighing the qualifications of the developer and the impacts it may have on his tenant farmer.

⁶ Mr. Jeff Westgor Comments, August 10, 2020, eDocket ID Nos. 20208-165816-01 and 20208-165787-01.

6. Mr. Klay Walinga, Vice President, Manager, Farm Services Department, Chambers Family Farms, LLC submitted a comment letter on August 10, 2020 in support of the proposed facility.⁷

Elk Creek appreciates the support of Mr. Walinga and Chambers Family Farms, LLC. Similar to Mr. Westgor, Chambers Family Farms, LLC is one of the landowners that voluntarily chose to participate in the Project, in part, because they support the expansion of renewable energy in Minnesota and are excited about that expansion happening on their land. Chambers Family Farms, LLC acknowledged some of their land will be taken out of agricultural production, but that they will continue to make their other land more productive to offset the losses. Elk Creek agrees with Mr. Walinga and Chambers Family Farms, LLC in their request that the Commission approve the Elk Creek Project.

7. Mr. Steven Schneiderman, submitted a comment letter on August 10, 2020 in opposition to the proposed facility.⁸

Elk Creek appreciates the comments of Mr. Schneiderman, but respectfully disagrees with his assessment that the approval of the Project would be an unwise use of Minnesota resources and a violation of law. Mr. Schneiderman correctly points out that Minnesota Rules 7850.4400 Subp. 4, otherwise known as the ‘prime farmland rule’ must be considered by the Commission in this situation because the Project is sited on prime farmland. However, the record clearly demonstrates that no feasible and prudent alternative to the proposed Project location has been offered or demonstrated to exist in the above referenced dockets and therefore the prime farmland rule does not prohibit the siting of the Project in its proposed location.

As Elk Creek pointed out in its Site Permit Application, Elk Creek’s decision to locate the Project in southwestern Minnesota was based, in large part, on the fact that the southwestern portion of the state also has the best solar resource in Minnesota. Elk Creek also chose to focus on Rock County because of the positive experience its owner, Geronimo, had with landowners and Rock County when developing the Prairie Rose Wind Farm. Elk Creek identified a substation in Rock County that had sufficient transmission capacity to support the Project and willing landowners directly adjacent to the interconnecting substation. Locating the Project in the portion of the state with the highest solar irradiance, close to available transmission capacity and on land owned by willing landowners are technical factors that are germane to every project proposer when it chooses a project location and are not, per se, economic considerations alone. Furthermore, Elk

⁷ Mr. Klay Walinga Comments, August 10, 2020, eDocket ID Nos. 20208-165816-01 and 20208-165787-01.

⁸ Mr. Steven Schneiderman Comments, August 10, 2020, eDocket ID Nos. 20208-165816-01, 20208-165816-01, 20208-165787-01 and 20208-165816-02.

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Creek searched for and was unable to find any 700-acre parcel within Rock or Nobles County, that was not an otherwise prohibited site, that could support the Project and was not prime farmland.

Mr. Schneiderman suggested that Elk Creek should have chosen a site in South Dakota or other areas that do not have prime farmland and because the Project theoretically could have been sited in some other unspecified state, building or geographic location, there is a prudent and feasible alternative to the Project. Elk Creek disagrees with this analysis. Neither Mr. Schneiderman nor any other person that commented on the Project has presented a specific location that could be assessed or used as an alternative for the Project.

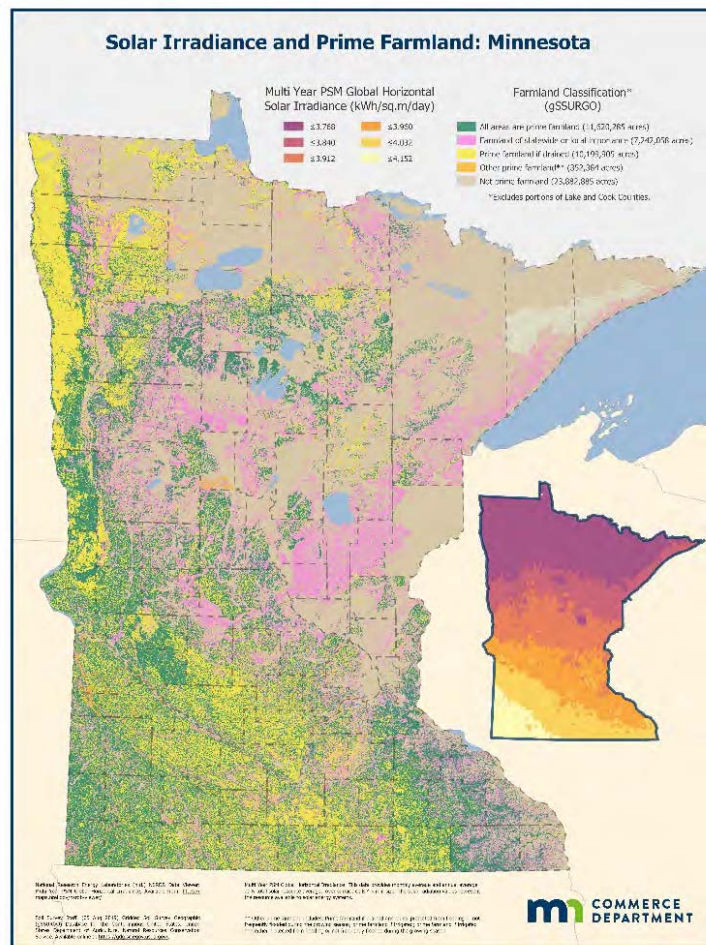
The prime farmland rule does not specify an alternatives analysis an applicant must conduct or the array of geographic locations in which a project proponent must search within to determine whether a feasible and prudent analysis exists.⁹ To require an applicant to search any location that does not have prime farmland and demonstrate that all such locations are not feasible is not practicable and could render the southwestern third of the state of Minnesota off-limits to utility-scale solar development in Minnesota even though it is the portion of the state with the best solar resource and the resource that is likely to be the most competitive with solar developments outside of Minnesota.¹⁰ Diagram 17 from DOC-EERA's Environmental Assessment¹¹ prepared for the Project is provided below to illustrate this point.

⁹ The DOC-EERA guidance document for evaluating feasible and prudent alternatives in prime farmland "Solar Energy Production and Prime Farmland" was released on May 19, 2020, after Elk Creek filed its Site Permit Application on September 13, 2019 for a Site Permit. The guidance document also does not specify the geographic extent to which an applicant must search for potential alternatives to demonstrate there are no feasible and prudent alternatives to the proposed Project. Regardless, Elk Creek believes its analysis of alternatives in its Site Permit Application satisfies the guidance provided in the Solar Energy Production and Prime Farmland guidance document.

¹⁰ See Diagram 17. Solar Irradiance and Prime Farmland, in DOC-EERA's Environmental Assessment prepared for the Project, copied below in these response to public comments, the best solar resource in the state of Minnesota is also almost entirely prime farmland.

¹¹

<https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={A017C472-0000-CF35-B273-7707AD7CD3DC}&documentTitle=20206-164062-02>, at page 71.



Elk Creek clearly documented in its Site Permit Application how it arrived at choosing the proposed location in Rock County which included why it chose to search for a Project location in southwestern Minnesota and an analysis of Nobles and Rock Counties to determine whether any feasible and prudent alternative existed within either county to site the Project and was unable to find an alternative. No alternative sites were raised during the Commission's permitting process. Accordingly, there is no feasible and prudent alternative to the Project.

8. During the public hearing for the Project on July 23, 2020 several members of the public asked questions and presented comments to DOC-EERA and Elk Creek.¹² Most of the

¹² <https://www.edockets.state.mn.us/EFiling/edockets/transcripts.html?userType=public>

public questions were addressed by either DOC-EERA and Elk Creek during the public hearing. Elk Creek requested that it be allowed to respond to two of Mr. Paul Arends' questions after the public hearing. Specifically, Mr. Arends asked whether the power purchase agreement specifies how many times Elk Creek can go back to the Commission to ask to be paid more for the energy generated by the Project. He also asked about tax incentives Elk Creek is receiving from the State for the Project.

Elk Creek appreciates the opportunity to respond to Mr. Arends' questions after the public hearing.

First, the power purchase agreement between Elk Creek and Xcel Energy that was approved by the Commission on February 20, 2020¹³ does not contain any provisions that allow Elk Creek to petition the Commission for an increase in the price paid to Elk Creek for energy generated and delivered to Xcel Energy under the power purchase agreement.

Second, Elk Creek will not receive any direct state funds for the Project. The Minnesota state legislature has exempted all real and personal property of solar energy conversion systems such as the Project from property taxes.¹⁴ Solar energy conversion systems such as the Project are also exempt from state sales tax.¹⁵ Elk Creek also intends to pursue the federal solar investment tax credit, "ITC", provided by Section 48 of the federal Internal Revenue Code, which permits qualifying entities to elect to claim a credit of 30 percent of qualifying costs for a project that has begun construction through 2019, with a step down of the credits through 2021. In December 2015, the Consolidated Appropriations Act extended the expiration date for the ITC for solar facilities to December 31, 2019. As modified, Section 48 phases down the ITC for solar energy property the construction of which begins after December 31, 2019, and before January 1, 2022.

Elk Creek expects to utilize the ITC as part of the Project's long-term financing structure and anticipates meeting the requirements necessary to qualify for the full 30 percent ITC. Under the power purchase agreement, Elk Creek assumes all of the risk of qualifying for the ITC

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<https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={E0FC336F-0000-CA10-AD6A-2E1B198B19A2}&documentTitle=201912-158561-01> at Page 3.

¹⁴ Minn. Stat. § 272.02, subd. 24.

¹⁵ Minn. Stat. § 297A.67, subd. 29.

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qualification.¹⁶ In other words, if Elk Creek does not qualify for the ITC, it must still deliver the power to Xcel Energy for the prices set forth in the power purchase agreement.

It is also important to note that the Project will pay a Production Tax to the local units of government of \$1.20 per MWh of electricity produced, resulting in production tax payments to Rock County of approximately \$144,000 annually over 25 years. Additionally, Vienna Township will receive approximately \$36,000 annually over 25 years.

Conclusion

In conclusion, Elk Creek appreciates the comments received for the proposed facility. Elk Creek respectfully requests the Commission issue a site permit and a certificate of need for the Project.

Sincerely,

FREDRIKSON & BYRON, P.A.

/s/ Jeremy P. Duehr

Jeremy P. Duehr
Direct Dial: 612.492.7413
Email: jduehr@fredlaw.com

JPD:blj: 71065197 v3

¹⁶ Xcel Energy, Petition (Initial Filing) *In the Matter of the Petition of Northern States Power Company for Approval of Solar Energy Purchase Agreement with Elk Creek Solar, LLC for 80 MW Solar Generation*, Docket No. E002/M-19-568 (September 11, 2019), at 9.

**In the Matter of the Applications of Elk Creek
Solar, LLC for a Certificate of Need and a Site
Permit for the up to 80 MW Elk Creek Solar
Project in Rock County, Minnesota**

CERTIFICATE OF SERVICE

**MPUC Docket Nos. IP-7009/CN-19-351 and IP-
7009/GS-19-495
OAH Docket No. 71-2500-36619**

Breann L. Jurek certifies that on the 5th day of October 2020, she e-filed on behalf of Elk Creek Solar, LLC a true and correct copy of the following document:

1. Responses to Public Comments

to the Minnesota Public Utilities Commission, via edockets (www.edockets.state.mn.us). Said documents were also served on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto

Executed on: October 5, 2020

Signed: /s/ Breann L. Jurek

Fredrikson & Byron, P.A.
200 South Sixth Street
Suite 4000

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daniel	Beckett	daniel.beckett@state.mn.us	Department of Commerce	85 7th Pl E #500 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_19-351_Official CC Service List
Jordan B	Burmeister	jordan@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste. 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-351_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-351_Official CC Service List
Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.	200 South Sixth Street Suite 4000 Minneapolis, Minnesota 55402-1125	Electronic Service	No	OFF_SL_19-351_Official CC Service List
Bret	Eknes	bret.eknes@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	No	OFF_SL_19-351_Official CC Service List
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_19-351_Official CC Service List
Annie	Felix Gerth	annie.felix-gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_19-351_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-351_Official CC Service List
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-351_Official CC Service List
Michael	Kaluzniak	mike.kaluzniak@state.mn.us	Public Utilities Commission	Suite 350 121 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-351_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-351_Official CC Service List
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_19-351_Official CC Service List
Susan	Medhaug	Susan.medhaug@state.mn.us	Department of Commerce	Suite 280, 85 Seventh Place East St. Paul, MN 551012198	Electronic Service	Yes	OFF_SL_19-351_Official CC Service List
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	Yes	OFF_SL_19-351_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-351_Official CC Service List
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_19-351_Official CC Service List
Melissa	Schmit	melissa@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste. 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-351_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-351_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_19-351_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
William	Storm	bill.storm@state.mn.us	Department of Commerce	Room 500 85 7th Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_19-351_Official CC Service List
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_19-351_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daniel	Beckett	daniel.beckett@state.mn.us	Department of Commerce	85 7th Pl E #500 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_19-495_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-495_Official CC Service List
Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.	200 South Sixth Street Suite 4000 Minneapolis, Minnesota 55402-1125	Electronic Service	No	OFF_SL_19-495_Official CC Service List
Bret	Eknes	bret.eknes@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	No	OFF_SL_19-495_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-495_Official CC Service List
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_19-495_Official CC Service List
Michael	Kaluzniak	mike.kaluzniak@state.mn.us	Public Utilities Commission	Suite 350 121 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-495_Official CC Service List
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	Yes	OFF_SL_19-495_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-495_Official CC Service List
Melissa	Schmit	melissa@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste. 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-495_Official CC Service List

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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-495_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_19-495_Official CC Service List
William	Storm	bill.storm@state.mn.us	Department of Commerce	Room 500 85 7th Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_19-495_Official CC Service List
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_19-495_Official CC Service List