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May 8, 2017

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E,ET,IP 999/R-12-1246

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources, Energy Regulation and Planning (DOC-DER-ERP) in the following matter:

Possible Amendments to Rules Governing Certificates of Need and Site and Route Permits for Large Electric Power Plants and High-Voltage Transmission Lines, Minnesota Rules, Chapters 7849 and 7850; and to Rules Governing Notice Plan Requirements for High-Voltage Transmission Lines, Minnesota Rules, Part 7829.2550.

The DOC-DER-ERP recommends the Commission **make one change and proceed with the formal rulemaking steps** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ STEVE RAKOW
Analyst Coordinator

SR/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET NO. E,ET,IP 999/R-12-1246

I. INTRODUCTION

On March 9, 2017, the Minnesota Public Utilities Commission (Commission) met to consider next steps in the rulemaking process and decided to request comments on the drafts before proceeding with formal rulemaking steps.

On March 23, 2017, the Commission issued its *Notice of Comment Periods* (Notice) indicating that comments were due May 8, 2017 and reply comments were due May 31, 2017. Topics open for comment include:

- Any issue arising from the February 2017 rule drafts of Chapters 7849 and 7850 as filed in the Commission's electronic filing system in this docket.
- Any recommended change to the drafts, along with the rule part affected and the reason for the change.
- The economic effects of the drafts, including identifying any other federal or state regulations that may have a cumulative effect.
- The effect of existing law on the draft rule changes.
- Whether pre-application meetings under part 7850.1620 should be required only for route permit applications or also for site permit applications.
- Any issue arising from changing the definition of "associated facilities" in both rule chapters to include "natural gas pipelines directly associated with a large electric generating facility that is necessary to interconnect the plant to the transmission line."
- Any issue arising from the new language in part 7850.1640, subpart 1 (P), (Q), and (R) concerning local zoning and use of eminent domain and in part 7850.1640, subpart 2 (Q) and (R) concerning use of eminent domain.
- Any issue arising from the new language in parts 7849.0208 and 7850.1710 on application completeness to require that incomplete applications be considered at "the earliest possible Commission agenda meeting for further review by the Commission, considering the applicant's availability and request for additional time."

- Any issue arising from the new language in parts 7849.0250 and .0260 requiring an applicant to consider “energy storage” as an alternative to the proposed facility.
- Any issue arising from the new language in part 7850.1500, subp. 1 (C) (4) to exempt from the permit requirements modification of a solar-powered plant “that is exempt from a certificate of need under Minn. Stat. § 216B.243, subd. 8(7), as long as the plant is not expanded beyond the developed portion of the plant site.”
- Any issue arising from the new language in part 7850.4400 (B) authorizing use of prime farmland for solar-powered plants only if the Commission approves a farm mitigation plan developed in consultation with the Department of Agriculture and if there is no local zoning ordinance prohibiting the construction of solar-powered plants on prime farmland.
- Any issue arising from the new language in part 7850.4925 giving authority to a local unit of government to file a complaint about alleged permit violations on behalf of its constituents.

II. DOC-DER-ERP COMMENTS

The Minnesota Department of Commerce, Division of Energy Resources, Energy Regulation and Planning Unit (DOC-DER-ERP) participates in all Certificate of Need proceedings, providing comments regarding exemption petitions, notice plans, application completeness, process, and ultimately on whether the Certificate of Need should be granted, and if so, whether approval should be subject to conditions. The DOC-DER-ERP does not provide analyses or recommendations in the routing and siting proceedings. Therefore, the following discussion applies only to Minnesota Rules, Chapter 7849.

A. *RECOMMENDED CHANGES*

The DOC-DER-ERP recommends that the Commission consider changing the proposed language in 7849.0300. Currently the draft states “The applicant shall present a discussion of anticipated consequences to its system, neighboring systems, and the power pool...” However, elsewhere in the proposed rules the term power pool has been deleted. The most applicable of the defined terms is Regional Transmission Organization (7849.0100 Subp. 25). Therefore, the DOC-DER-ERP recommends the following change:

The applicant shall present a discussion of anticipated consequences to its system, neighboring systems, and the ~~power pool~~ RTO should the proposed facility be delayed one, two, and three years, or postponed indefinitely.

B. *DEFINITION OF “ASSOCIATED FACILITIES”*

The Notice requested comments on any issue arising from changing the definition of “associated facilities” in both rule chapters to include “natural gas pipelines directly associated with a large electric generating facility that is necessary to interconnect the plant

to the transmission line.” The proposed change largely impacts the environmental report. However, DOC-DER-ERP agrees that all aspects of a certificate of need proceeding should address natural gas pipelines necessary to interconnect a large electric generating facility.

C. NEW LANGUAGE IN 7849.0208

The Notice requested comments on any issue arising from the new language requiring that incomplete applications be considered at “the earliest possible Commission agenda meeting for further review by the Commission, considering the applicant’s availability and request for additional time.” Overall, the DOC-DER-ERP supports the completeness review process outlined in the proposed rules. The DOC-DER-ERP has no specific issues with the new language.

D. ENERGY STORAGE AS AN ALTERNATIVE

The Notice requested comments on any issue arising from requiring an applicant to consider “energy storage” as an alternative. The DOC-DER-ERP agrees that all alternatives should be addressed in a certificate of need process. The DOC-DER-ERP has no specific issues with considering energy storage as an alternative.

III. DOC-DER-ERP RECOMMENDATION

The DOC-DER-ERP recommends that the Commission change the term “power pool” to “RTO” in 7849.0300 and proceed with the formal rulemaking steps.

/lt

CERTIFICATE OF SERVICE

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

**Minnesota Department of Commerce
Comments**

Docket No. E, ET, IP999/R-12-1246

Dated this 8th day of May 2017

/s/Sharon Ferguson

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U14034 Elm Creek Wind, LLC Tim Seck 2221 Riverwood Place St. Paul MN 55104	U10334 Ely Light & Water Dept. Harold Langowski Clerk-Treasurer 209 East Chapman St. Ely MN 55731	U10336 Emmons Public Utilities NO LONGER EXISTS 11/82
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NO LONGER EXISTS
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U10580
Lakefield Public Utilities
Jim Koep Supt.
PO Box 1023
Lakefield MN 56150-1023

U10584
LeSueur Municipal Utilities
Greg Drent Electric Director
203 South 2nd Street
LeSueur MN 56058

U10595
Lyon-Lincoln Electric Cooperative, Inc.
Tim O'Leary General Manager
West Highway 14
PO Box 639
Tyler MN 56178-0639

U10637
Mabel Public Utilities
J. Narum Clerk
Box 425
Mabel MN 55954

U10541
Kandiyohi Power Cooperative
Scott Froemming CEO
8605 47th St NE
Spicer MN 56288-0040

U10546
Keewatin Public Utilities
Michael LaBine City Supervisor
P.O. Box 190
Keewatin MN 55753-0190

U14019
Kenyon Wind, LLC
John H. Daniels Manager
201 Ridgewood Avenue
Minneapolis MN 55403

U6903
Lake Benton Power Partners II, LLC
Paul Martinez Bus Mgr
700 Universe Blvd FEJ/JB
c/o NextEra Energy Resource
Juno Beach FL 33408

U6846
Lake Country Wind Energy, LLC
Will Cooksey
706 2nd Ave S Ste 1200
Minneapolis MN 55402

U10574
Lake Region Electric Coop
Tim Thompson CEO
1401 South Broadway
P. O. Box 643
Pelican Rapids MN 56572

U6829
Lakefield Wind Project, LLC
Kate O'hair
10 2nd St NE Ste 107
Minneapolis MN 55413

U10587
Litchfield Public Utilities Commission
David Cziok City Administrator
126 Marshall Ave N
Litchfield MN 55355

U13738
MAPP Wind II, LLC
Brian D Sickels President
PACIFICORP POWER MARKETING, INC.
825 NE MULTONOMAH ST
PORTLAND OR 97232

U10639
Madelia Municipal Light & Power Dept.
James Maras Manager
24 Abbott Ave SW
Madelia MN 56062

U10641
Madison Municipal Utilities
Don Fernholz Electric Supervisor
616 8th sT
Madison MN 56256

U6941
Marshall Solar, LLC
Andrew Gibbons Gen. Counsel
1209 Orange St
Wilmington DE 19801

U10654
McLeod Cooperative Power Assn.
General Manager
1231 Ford Avenue, PO Box 70
Glencoe MN 55336-0070

U10657
Melrose Public Utilities
Michael Brethorst City Administrator
225 E First St N
PO Box 216
Melrose MN 56352-0216

U10680
Minnesota Power
Herbert Minke Controller
30 W Superior St
Duluth MN 55802-2191

U10683
Minnesota Valley Electric Cooperative
Ryan Hentges General Manager
125 Minnesota Valley Electric Dr
Jordan MN 55352-0125

U10686
Moorhead Public Service Dept. (E)
B. Schwandt General Mg
PO Box 779
500 Center Ave
Moorhead MN 56561-0779

U6901
Moraine Wind, LLC
Kristin Sare Asset Mgr
c/o Iberdrola Renewables
1120 NW Couch St Ste 625
Portland OR 97209

U10690
Mountain Lake Municipal Utilities
Ron Melson Superintendent
1015 2ND AVE
DRAWER C
Mountain Lake MN 56159

U10714
New Prague Utilities Commission
Bruce Reimers General Manager
118 CENTRAL AVE N
New Prague MN 56071

U6949
Mankato Energy Center II, LLC
Champe Fisher Vice President Commercial
500 Delaware Ave.
Suite 600
Wilmington DE 19801

U10648
Mazeppa Public Utilities
NO LONGER EXISTS
11/82

U6820
Medin Renewable Energy, LLC
Leone Medin
1802 Girard Ave S
Minneapolis MN 55403

U10672
Mille Lacs Energy Coop. (E)
Brian Zelenak Gen. Mgr.
PO Box 230
Aitkin MN 56431

U12888
Minnesota Rural Electric Association
Jim Horan
11640 73rd Ave N
Maple Grove MN 55369

U12705
Minnkota Power Cooperative, Inc.
Craig Rustad
PO Box 13200
1822 Mill Road
Grand Forks ND 58208-3200

U10688
Mora Public Utilities Commission
Joel Dhein
101 LAKE ST S
Mora MN 55051-1588

U14095
Morgan Wind Acquisition Group, LLC
Paul Dinzeo General Manager
3145 ILO Way
Stillwater MN 55082

U10707
Nashwauk Public Utilities Dept.
Pamela LaBine City Clerk
301 CENTRAL AVE
Nashwauk MN 55769-1131

U10715
New Ulm Public Utilities Comm. - Electric
Patrick Wrase DIRECTOR OF UTILITIES
310 1ST ST N
NEW ULM MN 56073-1675

U10645
Marshall Municipal Utilities
Brad Roos General Mgr
113 S 4th St
Marshall MN 56258

U10653
McKinley Public Utilities
Dan Kodroski
McKinley MN 55761

U10656
Meeker Light & Power Assn.
Timothy Mergen Mgr.
1725 US Hwy 12 East
Suite 100
Litchfield MN 55355

U12887
Minnesota Municipal Utilities Association
Greg Oxley Government Relations
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Plymouth MN 55447-5142

U10682
Minnesota Valley Coop. Light & Power Ass
Patrick C. Carruth Gen. Mgr.
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Montevideo MN 56265-2103

U12831
Missouri River Energy Services
Merlin Sawyer Admin. & Finance Manager
3724 W AVERA DR
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Sioux Falls SD 57109-8920

U14035
Moraine Wind II, LLC
Tim Seck
2221 Riverwood Place
St. Paul MN 55104

U10689
Mountain Iron Light & Water Dept.
Michael Downs Director of Public Works
8586 ENTERPRISE DR S
Mountain Iron MN 55768-8260

U14080
New Era Wind Farm, LLC
Peter J Mastic
PO Box 307
Goodhue MN 55027

U10718
Newfolden Electric Dept.
Grace Lindquist Clerk
PO BOX 188
Newfolden MN 56738-0188

U10719
Nielsville Municipal Utility
Stephanie Abentroth Clerk
PO Box 5
Nielsville MN 56568

U10720
Nobles Cooperative Electric
ADAM TROMBLAY GENERAL MANAGER
22636 US HIGHWAY 59
PO BOX 788
WORTHINGTON MN 56187

U10728
North Pine Electric Coop., Inc.
M.A. Hillert , Jr. Gen. Mgr.
2200 Finland Ave.
PO Box 8
Finlayson MN 55735

U6943
North Star Solar PV LLC
Eric Blank
100 S 5th Str #1075
Minneapolis MN 55402

U14071
Northstar Transmission, LLC
Al Blum
418 Central Ave
Estherville IA 51334

U6914
Odell Wind Farm, LLC
Patrick Smith Dir
7650 Edinborough Way, ste 725
Edina MN 55435

U10756
Otter Tail Power Company
Jeff Legge Controller
PO Box 496
215 S Cascade St
Fergus Falls MN 56538-0496

U6979
Palmer's Creek Wind Farm, LLC
Ron Fagen
501 West Highway 212
Granite Falls MN 56241

U10791
Peterson Electric Dept.
P. Benson
118 Fillmore St
PO Box 67
Peterson MN 55962

U6828
Pleasant Valley Wind LLC
Joe Grennan Permitting Director
11101 W 120th Ave Ste 400
Broomfield CO 80021

U14072
Noble Flat Hill Windpark I, LLC
Suri Sukduang Quantum Utility Generatic
1401 McKinney St Ste 1800
Houston TX 77010

U10726
North Branch Light & Power Comm.
Mark Petsche
6388 Maple Street
North Branch MN 55056

U10730
North St. Paul Utility Dept.
Brian Frandle Elec. Supt
2400 Margaret St. N.
Saint Paul MN 55109-3020

U13723
Northern Municipal Power Agency
Darryl Tveitbakk
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Thief River Falls MN 56701

U10740
Northwestern Wisconsin Electric Co.
David M Dahlberg President
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Grantsburg WI 54840-0009

U10747
Olivia Municipal Water & Light Dept.
Greg Lippert
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Olivia MN 56277

U10757
Owatonna Municipal Public Utilities - Elec
Mark Fritsch General Manager
208 South Walnut
PO Box 800
Owatonna MN 55060

U6830
Paynesville Wind, LLC
Christina Brusven
200 South Sixth St
Suite 4000
Minneapolis MN 55402

U10794
Pierz Municipal Utilities
Mike Derosia Supt.
PO Box 367
Pierz MN 56364

U6838
Prairie Rose Transmission, LLC
David G Reamer
7650 Edinborough Way Ste 725
c/o Geronimo Wind Energy
Edina MN 55435-5990

U6964
Nobles 2 Power Partners, LLC
Paul White Manager
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Minneapolis MN 55414

U10727
North Itasca Electric Cooperative, Inc.
Jared Echternach
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Bigfork MN 56628

U10731
North Star Electric Cooperative, Inc.
Dan Hoskins General Manager
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P. O. Box 719
Baudette MN 56623

U12000
Northern States Power Company dba Xcel
SaGonna Thompson
414 Nicollet Mall FL 7
Minneapolis MN 55401

U6839
Oak Glen Wind Farm, LLC
Bruce Freeman
200 South 6th St ste 300
Mpls MN 55402

U10754
Ortonville Light & Water Dept.
Charleen Grossman City Clerk
315 Madison Ave
Ortonville MN 56278

U10772
PKM Electric Cooperative Assn.
Charles Riesen Mgr.
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Warren MN 56762

U10787
Peoples Cooperative Services dba People's
Elaine Garry President/CEO
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Oronoco MN 55960-2351

U14046
PlainStates Energy
John Ihle
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Barnesville MN 56514

U6844
Prairie Wind Energy, LLC
Terry L. Carlson
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Parkers Prairie MN 56361

U10797
Preston Public Utilities
Joseph Hoffman General Manager
PO Box 657
Preston MN 55965

U14018
Project Resources Corporation
Paul White
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Minneapolis MN 55414

U10831
Red Lake Electric Coop.
Roger Johanneck Mgr.
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Red Lake Falls MN 56750

U10835
Redwood Electric Cooperative
Ron Horman General Manager
60 Pine St
Clements MN 56224-5000

U14084
Ridgewind Power Partners, LLC
Angeli Modjeski Admin Asst
618 2nd Ave SE
Minneapolis MN 55414

U10850
Roseau Munic. Power Plant
Beth Hellquist City Clerk
100 2nd Ave
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Roseau MN 56751

U10857
Rushford Electric Dept.
Katherine Zacher City Clerk
PO Box 430
Rushford MN 55971

U10940
SIOUX VALLEY - SOUTHWESTERN ELECTRIC
Tim McCarthy General Manager/CEO
PO Box 216
Accounts Payable
Colman SD 57017

U6858
Shell Rock Wind Farm, LLC
Bruce Freeman
c/o Avant Energy
200 South Sixth Street, Suite 300
Mpls MN 55402

U10932
Sleepy Eye Public Utilities Commission
Bob Elston Public Works Director
130 2nd Avenue NW
Sleepy Eye MN 56085

U10798
Princeton Public Utilities Commission
Connie Wangen General Manager
907 1st Street
Princeton MN 55371

U10830
Randall Electric Light Company
Matt Pantzke Admin.
Randall MN 56475

U6959
Red Pine Wind Project, LLC
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U10836
Redwood Falls Public Utilities
Charles Heins Supt.
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Redwood Falls MN 56283-0526

U10843
Rochester Public Utilities
Mark Kotschevar General Manager.
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Rochester MN 55906-2813

U10852
Round Lake Municipal Utility
Bruce Bentele Electric Sup.
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Round Lake MN 56167-0072

U10858
Rushmore Electric Dept.
Coleen Gruis Clerk/Treasurer
PO Box 227
Rushmore MN 56168

U10919
Sauk Centre Light & Power Comm.
Paul Hoeschen Superintendent
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PO Box 128
Sauk Centre MN 56378

U10926
Shelly Electric Dept.
Jodean Neil Clerk
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Shelly MN 56581

U10936
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St. James MN 56081

U10800
Proctor Public Utilities Comm.
James Rohweder City Administrator
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Proctor MN 55810

U13663
Rapids Power LLC
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U10833
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Halstad MN 56548-0358

U12673
Renville-Sibley Cooperative Power
DeeAnne Newville CEO
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Danube MN 56230

U10849
Roseau Electric Coop., Inc.
Tracey Stoll General Manager
1107 3rd St NE
Roseau MN 56751

U10854
Runestone Electric Assn.
Rick Banke, Jr. Gen. Mgr.
6875 County Rd 28 SW
Alexandria MN 56308

U6947
SEV MN 1, LLC
Dean Leischow Originator
601 Carlson Pkwy #1050
Minnetonka MN 55305

U10924
Shakopee Public Utilities
John Crooks Mgr.
255 Sarazin St
Shakopee MN 55379

U14057
Sibley County Wind Project
David Norgaard President
1631 290th Ave
Tyler MN 56178

U12734
Southern MN Municipal Power Agency
Laura Sandwick
500 1st Ave SW
Rochester MN 55902-3303

U6819
Sparks Energy, LLC
Anna Schmalzbauer
1913 Ewing Ave S
Minneapolis MN 55416

U10945
Springfield Public Utilities
Scott Johnson Supt.
14 North Marshall Avenue
Springfield MN 56087

U10949
St. Peter Municipal Utilities
L.G. Giesking Dir. Public Works
227 S. Front Street
St. Peter MN 56082

U10955
Steele Waseca Coop. Electric
Syd Briggs General Manager
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Owatonna MN 55060-0485

U10959
Stuntz Coop. Light & Power Assn.
Walter Hagsten President
104 Cliffs Boy Scout Bldg.
Hibbing MN 55746

U11012
Todd Wadena Electric Coop.
Robin Doege Operations Manager
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U6907
Trimont Wind I, LLC
Pete Landoni Wind Asset Manager
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Portland OR 97209

U11024
Tyler Munic. Light & Power Dept.
Barb Powell City Clerk
PO Box 398
Tyler MN 56178

U11062
Virginia Dept. Of Public Utilities - Electric
Greg French General Manager
618 2nd Street
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Virginia MN 55792

U11081
Warren Light & Power Dept. - Electric
Shannon Mortenson City Administrator
120 E. Bridge Ave.
Warren MN 56762

U10941
Spring Grove Munic. Utility
Lyn Solberg Deputy Clerk
118 1st Ave NW
Spring Grove MN 55974

U10947
St. Charles Light & Water Dept.
Nick Koverman City Administrator
830 Whitewater Avenue
St. Charles MN 55972

U10951
Staples Munic. Water & Light Dept.
Jereh Nelsen City Administrator
122 6th St NE
Staples MN 56479

U10956
Stephen Electric Light Dept.
Brian Christensen Superintendent
PO Box 630
Stephen MN 56757

U6887
Tamarac Line, LLC
Paul White
618 2nd Ave SE
Minneapolis MN 55414

U11018
Traverse Electric Coop., Inc.
Clayton Halverson Manager
PO Box 66
Wheaton MN 56296

U11021
Truman Municipal Light Plant
Jeff Jansen Supt.
202 W. Ciro St
Truman MN 56088-0037

U6874
Uilk Wind Farm, LLC
Dan Yarano
266 Highway 30
Pipestone MN 56146

U11080
Wadena Light & Water Dept.
David Evans Utility Supt.
104 Jefferson Street North
Wadena MN 56482

U11082
Warroad Munic. Light & Power Dept.
D. Anderson Supt
PO Box 50
Warroad MN 56763

U10943
Spring Valley Public Utilities Comm.
Stu Smith Supt.
104 South Section Avenue
Spring Valley MN 55975

U10948
St. James Light & Water Dept.
Timothy Bechtold Electric Supt.
PO Box 70
St. James MN 56081-0070

U10954
Stearns Electric Assn.
Dave Gruenes CEO
PO Box 40
Melrose MN 56352-0040

U13960
Stoneray Power Partners, LLC
Melissa Peterson Sr Developer
C/O EDF Renewable Energy
10 2nd St NE Ste 400
Minneapolis MN 55413

U11011
Thief River Falls Water & Light Dept.
Dale Narlock Director
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Thief River Falls MN 56701

U11019
Tri-County Electric Coop.
Brian Krambeer President, CEO
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Rushford MN 55971-0626

U11023
Two Harbors Water & Light Dept.- Electric
Lee A Klein Administrator
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Two Harbors MN 55616-1504

U12646
United Power Association
Douglas J. Paumen Manager, Accounting :
PO Box 800
17845 East Highway 10
Elk River MN 55330

U14061
Wapsipinicon Wind Project, LLC
Kate O'Hair
10 2nd St NE Ste 400
c/o EDF Renewable Energy
Minneapolis MN 55413-2652

U11083
Waseca Electric Utility
ATTN Finance Dept.
508 South State Street
Waseca MN 56093

U11086
Wells Public Utilities Commission
Jeff Amy Superintendent
101 1st St SE
PO Box 96
Wells MN 56097-0096

U13725
Western MN MPA
Bill Schwandt Treasurer
720 Center St
Ortonville MN 56278

U6896
Whirlwind Energy, LLC
Robert Meyerson
212 Atlantic Ave W
Atwater MN 56209

U11105
Windom Municipal Utilities
Brent Brown
444 9th Street
PO Box 38
Windom MN 56101

U14051
Wisconsin Power and Light Company
Kent Ragsdale Regulatory
4902 N Biltmore Ln
PO Box 77007
Madison WI 53707-1007

U11118
Wright Hennepin Coop. Electric Assn.
Tim Sullivan President & CEO
PO Box 330
6800 Electric Drive
Rockford MN 55373

U6824
West Stevens Wind, LLC
Keith Thorstad Pres. of Mnioka
PO Box 321
Chokio MN 56221

U11099
Whalan, City of
Lolly Melander Clerk-Treasurer
35318 Fairway Road
Lanesboro MN 55949

U11103
Wild Rice Electric Coop.
S. J. Haaven Mgr.
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Mahnomon MN 56557

U11107
Winnebago Rural Electric

PO Box 65
Thompson IA 50478

U6913
Woodstock Hills, LLC
Daniel Juhl CEO
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Pipestone MN 56164

U11094
Westbrook Light & Power Commission
Dennis Jutting Supt.
PO Box 308
Westbrook MN 56183-0308

U6895
Whirlwind Energy, LLC
Robert Meyerson
212 Atlantic Ave W
Atwater MN 56209

U11104
Willmar Munic. Utilities Comm.
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Willmar MN 56201

U11110
Winthrop Municipal Electric Plant
Jenny Hazelton City Administrator
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U11117
Worthington Public Utilities
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PO Box 458
Worthington MN 56187