

August 24, 2018

*ELECTRONIC FILING*

Daniel P. Wolf, Executive Secretary  
Minnesota Public Utilities Commission  
127 7th Place East, Suite 350  
St. Paul, MN 55101-2147

RE: Petition for Rulemaking  
Commission Docket No. E999/R-18-518

Dear Mr. Wolf:

**In the Matter of the Goodhue Wind Truth Petition for Rulemaking for Wind Turbine Siting Standards,  
Minn. R. Ch. 7854**

Energy Environmental Review and Analysis (EERA) staff provides the attached comments and recommendations in the above matter that address the advisability of initiating LWECS rulemaking at this time, and responding to Petitioner's assertions on the current Minn. Rule 7854.

We are available to answer any questions you might have.

Sincerely,

John Wachtler, Energy Program Director  
David Birkholz, Environmental Review Manager

*This page intentionally left blank.*

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS  
COMMENTS AND RECOMMENDATIONS**

*PUC Docket No. E999/R-18-518*

**Date:** August 24, 2018

**Staff:** John Wachtler | (651) 539-1837 | [john.wachtler@state.mn.us](mailto:john.wachtler@state.mn.us)  
David Birkholz | (651) 539-1838 | [david.birkholz@state.mn.us](mailto:david.birkholz@state.mn.us)

**In the Matter of the Goodhue Wind Truth Petition for Rulemaking for Wind Turbine Siting Standards,  
Minn. R. Ch. 7854**

**Issues Addressed:** *These comments and recommendations address:*

1. *Whether the Commission should initiate a rulemaking on LWECS siting standards;*
2. *while raising related issues and concerns; and*
3. *supporting establishment of an Advisory Committee to advise the Commission on the contents of possible rules, if rulemaking occurs.*

**Attachments:** None

**Additional documents:** <http://www.edockets.state.mn.us/EFiling/search.jsp> (Year 18, Number 518).

This document can be made available in alternative formats, that is, large print or audio, by calling (651) 539-1530 (voice).

---

## **Introduction and Background**

On July 30, Goodhue Wind Truth (GWT), through Ms. Carol Overland, filed a Petition for Rulemaking<sup>1</sup> for Minn. Rule 7854 for siting Large Wind Energy Conversion Systems (LWECS).

Although wind siting rules exist,<sup>2</sup> GWT suggests, “That rulemaking has not occurred.”<sup>3</sup> This position presumably arises from GWT’s assertions that, “There is no siting criteria within these rules, and no requirement of environmental review.”<sup>4</sup>

---

<sup>1</sup> Petition for Rulemaking (Petition), Goodhue Wind Truth, July 30, 2018, eDocket no. [20187-145383-01](#)

<sup>2</sup> [CHAPTER 7854, SITE PERMIT; LARGE WIND ENERGY SYSTEM](#)

<sup>3</sup> Petition (cover letter) at 2

<sup>4</sup> Petition at 2

The Minnesota Public Utilities Commission (Commission) responded by issuing a comment period<sup>5</sup> prior to making a determination and reply on the disposition of the request as per Minn. Statute 14.09.<sup>6</sup> Specifically, the Commission requested comments on whether the petition meets the content requirements as set out in Minn. R. 1400.2040, Subp. 1; if the Commission should initiate a rulemaking on siting standards for LWECS; if the Commission initiates a rulemaking, should it establish an Advisory Committee to advise it on the contents of possible rules; and if there are related issues or concerns?

## **EERA Responses Concerning the Petition**

There are two specific concerns raised in the current petition; 1) the Petitioner's opinion that the siting criteria in the current rule are inadequate; and 2) the Petitioner's interpretation that there is no environmental review requirement in the rule. It is EERA's view that the Petitioner's opinion misrepresents the state's permit review and environmental review of LWECS under the existing rule.

### ***Siting Criteria***

The legislative directive on siting to "site LWECS in an orderly manner compatible with environmental preservation, sustainable development, and the efficient use of resources"<sup>7</sup> is a broad criterion, and serves the process well. However, as the Petitioner points out, the siting criteria in the Power Plant Siting Act also apply. EERA agrees with the Petitioner that the criteria of Minn. Statute 216E.03, Subd. 7<sup>8</sup> need to be considered in LWECS siting. In recent applications, these criteria have been specifically addressed in the Findings of Fact as part of the record that goes before the Commission for decision.

However, the Petitioner also addresses the need for more specific guidelines and standards established by the Commission by rule. EERA does not agree that current standards for permit conditions should be included as criteria in the rule itself. Again, the purpose of any criterion is to fulfill the legislative directive; and it is appropriate to have requirements that an individual application must include in order to meet the requirements to receive a permit. EERA does not however agree that the rule needs to codify current permit conditions. We believe the Commission continues to need the latitude to evaluate and evolve these permit conditions and standards as further information becomes available and the effectiveness of any given permit condition is tested.

Finally, Minn. Statute 216F.02 refers back to Minn. Statutes 216E (the Power Plant Siting Act) in several instances. Therefore, it may be premature to commence LWECS rulemaking until the Commission updates the Power Plant Siting Act rules.

### ***Environmental Review***

Energy facilities review has always been unique, given the varied nature of the different facilities and the legislative time restraints on conducting the processes. That is one reason why the Environmental Quality Board (EQB), who had initial responsibility for review of these applications, authorized alternative environmental review for wind energy projects under their Environmental Review rules.<sup>9</sup>

---

<sup>5</sup> Notice of Comment Period, Commission, August 2, 2018, eDocket no. [20188-145500-01](#); Extension, August 14, 2018, eDocket no. [20188-145500-01](#)

<sup>6</sup> [14.09 PETITION FOR ADOPTION OF RULE](#)

<sup>7</sup> [216F.03 SITING OF LWECS](#)

<sup>8</sup> [216E.03 DESIGNATING SITES AND ROUTES](#)

<sup>9</sup> [4410.3600 ALTERNATIVE REVIEW](#)

The EQB approved environmental review for LWECS as an alternative form of environmental review when it approved the wind rules in 2002.<sup>10</sup> Minn. Rule 7854.0500, subp. 7 requires the permit application to include an analysis of the potential impacts of the project, proposed mitigative measures, and any adverse environmental effects that cannot be avoided, including a list of extensive analysis categories. It is true that it is unusual that the rule does not require a separate environmental document. However, that doesn't mean a complete environmental review is not performed.

EERA works with LWECS applicants well before an application is submitted to make sure all necessary studies and surveys are performed. These include economic and environmental issues, as well as modeling for noise and shadow flicker. The applicants also work with the Department of Natural Resources on bird and bat issues and potential impacts to sensitive resources. It is also part of the EERA guidance that applicants work with the US Fish and Wildlife Service and perform Tier I (site characteristics) and Tier II and III studies that are indicated by Tier I review. In the end, though the environmental review is part of the applicants' filings, the potential impacts and mitigations are thoroughly vetted by EERA and the Commission. Finally, environmental review should include an opportunity for the public to participate in the agency decision-making, and the current wind rules do require public participation in the form of meetings and hearings.<sup>11</sup>

EERA therefore strongly disagrees with GWT's description of the process as having "no requirement of environmental review." As envisioned by the EQB, and as executed by the Commission and EERA, LWECS permit review includes robust environmental review.

## **EERA Staff Recommendations**

EERA makes the following recommendations in response to the Petition for Rulemaking:

1. As the requirements for petitioning to amend rules<sup>12</sup> in Minn. Rule 1400.2040, subp. 1 are straightforward and concise, EERA believes the GWT Petition fulfills the content requirements for filing.
2. While there may be benefit in refining criteria specific to LWECS siting, EERA would caution against using rulemaking to establish specific permit conditions and standards that may need to be regularly evaluated and potentially revised.
3. If rulemaking is initiated, EERA does not think it is appropriate to alter the environmental review content of the existing rule.
4. Should rulemaking commence, EERA advises that if the Commission establishes an Advisory Committee it should be given clear goals for any amendments. The committee should comprise developers, utilities, affected agencies and select interested parties.

In the end, EERA questions whether it is the most efficient time for LWECS rulemaking while the Commission is still in the process of developing revisions to the Power Plant Siting Act rules.

<sup>10</sup> 7854.0500 SITE PERMIT APPLICATION CONTENTS

<sup>11</sup> 7854.0900 PUBLIC PARTICIPATION

<sup>12</sup> 1400.2040 PETITION FOR RULEMAKING

## **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 & Recommendations**

**Docket No. E999/R-18-518**

**Dated this 24<sup>th</sup> day of August 2018**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-518_Official
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_18-518_Official
Douglas	Eayrs	info@dodgecc.org		17360 73rd PL N  Maple Grove, MN 55311	Electronic Service	No	OFF_SL_18-518_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-518_Official
Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_18-518_Official
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201  St. Paul, MN 55104	Electronic Service	No	OFF_SL_18-518_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-518_Official

U10037  
Ada Water & Light Dept.  
Brian S Rasmusson Public Works Director  
PO Box 32  
Ada MN 56510-0032

U10038  
Adrian Public Utilities  
Ritz Boltjes Deputy Clerk  
PO BOX 190  
Adrian MN 56110-0190

U10045  
Agralite Electric Cooperative  
Korwin Johnson General Manager  
PO BOX 228  
320 E HIGHWAY 12  
Benson MN 56215-0228

U10046  
Aitkin Public Utilities Commission  
Dave Cluff General Manager  
120 1ST ST NW  
Aitkin MN 56431-1306

U10048  
Alexandria Light & Power (E)  
Allen Crowser Gen. Mgr.  
316 FILLMORE ST  
PO BOX 609  
Alexandria MN 56308-1315

U10050  
Alpha Electric Dept.  
Linda York Clerk  
PO Box 97  
Alpha MN 56111

U10052  
Alvarado Electric Dept.  
Ken Dagoberg Supt.  
PO Box 935  
Alvarado MN 56710

U10070  
Anoka Water, Light Dept.  
Daniel Voss Utilities Director  
501 Pierce Street  
Anoka MN 55303

U10072  
Arlington Electric & Water Dept.  
Liza Donabauer City Administrator  
204 Shamrock Dr.  
Arlington MN 55307

U10074  
Arrowhead Electric Coop., Inc.(E)  
Joe Buttweiler  
PO Box 39  
Lutsen MN 55612-0039

U10082  
Austin Utilities - Electric  
Mark Nibaur General Manager  
1908 14th St NE  
Austin MN 55912

U10128  
Bagley Public Utilities Commission-elec  
Michael Jensen Utility Manager  
PO Box M  
Bagley MN 56621

U10130  
Barnesville Municipal Light & Power  
Guy Swenson TEC Manager  
PO Box 550  
Barnesville MN 56514

U10133  
Baudette Municipal Utilities  
Tina Rennemo City Superintendent  
PO Box 548  
Baudette MN 56623-0548

U10135  
Beltrami Electric Coop., Inc.  
Lynette Nieuwsma General Mgr  
P. O. Box 488  
Bemidji MN 56601

U10139  
Benson Water & Light Dept.  
Rob Wolfington City Manager  
1410 Kansas Avenue  
Benson MN 56215

U10145  
Biwabik Public Utilities  
Jeff Jacobson City Administrator  
PO Box 529  
Biwabik MN 55708

U10147  
Blooming Prairie Public Utilities Commissi  
Jerry Mausbach General Mgr  
PO Box 55  
Blooming Prairie MN 55917-0055

U10148  
Blue Earth Light & Water Dept.  
Tim Stoner General Manager  
125 E 7th St  
Blue Earth MN 56013

U10375  
Blue Earth-Nicollet-Faribault Cooperative  
Dave Sunderman  
PO Box 8  
Hwy 169 South  
Mankato MN 56001

U10152  
Brainerd Water & Light Dept.  
Scott Magnuson Superintendent  
PO Box 373  
Brainerd MN 56401-0373

U10153  
Breckenridge Public Utilities  
Roger Avelsgard Director of Public Serv  
420 Nebraska Ave  
Breckenridge MN 56520

U10154  
Brewster Electric Light & Power Dept.  
James Naumann Superintendent  
PO Box 55  
Brewster MN 56119-0055

U10157  
Brown County Rural Electrical Association  
Terry Helget  
PO BOX 529  
24386 STATE HWY 4  
SLEEPY EYE MN 56085-0529

U10158  
Brownton Municipal Light Plant  
Ella Kruse City Clerk/Treasurer  
PO Box 238  
Brownton MN 55312

U10160  
Buffalo Municipal Electric Dept.  
Joseph Steffel Utilities Director  
212 Central Avenue  
Buffalo MN 55313

U10161  
Buhl Water Light Heat & Bldg. Comm.  
John Markas Foreman  
P. O. Box 704  
Buhl MN 55713

U10069  
CONNEXUS ENERGY  
Nancy Basara Controller  
14601 Ramsey Blvd  
Ramsey MN 55303

U10210  
Caledonia Light & Water Dept.  
Ted Schoonover City Clerk/Administrator  
PO Box 232  
Caledonia MN 55921-0232

U10224  
Ceylon Water & Light Dept.  
Mary Muller  
PO Box 328  
Ceylon MN 56121



U10544 City Of Kasson ELECTRIC Dept. City Administrator 401 5th St SE Kasson MN 55944-2204	U10225 City of Chaska Electric Department Toby Saxon Electrical Director 660 Victoria Dr Chaska MN 55318	U10359 City of Fairmont Tom Koeritz Assistant Finance Officer 100 Downtown Plaza FAIRMONT MN 56031-0751
U10570 City of Lake City Scott Jensen Public Works Director 205 West Center Street Lake City MN 55041	U11099 City of Whalan Lolly Melander Clerk-Treasurer 35318 Fairway Road Lanesboro MN 55949	U10232 Clearwater-Polk Electric Coop., Inc. Bruce Bjerke General Manager PO Box O Bagley MN 56621
U11008 Coop Light & Power Assn. Of Lake Co, The Steven Wattnem Gen. Mgr. 4th St. & 15th Ave. PO Box 69 Two Harbors MN 55616	U10257 Crow Wing Cooperative Power & Light Co. Bruce L. Kraemer Gen. Mgr. PO Box 507 Hwy 371 North Brainerd MN 56401	U10285 Dakota Electric Association Greg Miller Pres/CEO 4300 220th St W Farmington MN 55024-9583
U10292 Delano Municipal Utilities Commission Paul Twite General Manager PO Box 65 Delano MN 55328-0065	U10294 Detroit Lakes Public Utilities Commission Vernell Roberts General Manager PO Box 647 Detroit Lakes MN 56502-0647	U10301 Dundee Light & Power Jessica Mitchell City Clerk 111 N. Main St. Dundee MN 56131
U10302 Dunnell Light & Water Janette Hybbert City Clerk PO Box 94 Dunnell MN 56127	U10316 East Central Energy Steve Shurts President/CEO 412 North Main Braham MN 55006	U10317 East Grand Forks Water & Light Keith R Mykleseth General Manager PO Box 322 East Grand Forks MN 56721-0322
U10329 Eitzen Public Utilities Steve Schuldt Clerk City of Eitzen Box 110 Eitzen MN 55931	U10330 Elbow Lake Municipal Electric Dept. Greg Jacobson Water/WW/Maint. Sup. PO Box 1079 Elbow Lake MN 56531	U10333 Elk River Municipal Utilities Troy Adams PO Box 430 Elk River MN 55330-0430
U10334 Ely Light & Water Dept. Harold Langowski Clerk-Treasurer 209 East Chapman St. Ely MN 55731	U10357 Fairfax Municipal Utilities Eric Nelson Supt 206 South 1st Street Fairfax MN 55332	U10365 Federated Rural Electric Association Scott Reimer General Manager 77100 US Highway 71 PO BOX 69 Jackson MN 56143
U10371 Fosston Municipal Light & Power Cassie (Cassandra) Heide Assistant City 220 East 1st Street Fosston MN 56542	U10373 Freeborn-Mower Cooperative Services Jim Krueger CEO/President PO Box 611 2501 Main St E Albert Lea MN 56007	U10406 Gilbert Water & Light Dept. Debra Sakrison City Clerk PO Box 548 Gilbert MN 55741
U10407 Glencoe Light & Power David Meyer Manager 305 11th St E Glencoe MN 55336	U10409 Goodhue County Cooperative Electric Douglas K. Fingerson Gen Mgr PO Box 99 1410 NorthStar Dr Zumbrota MN 55992-1091	U10412 Grand Marais Public Utilities Comm. Mike Taylor Line Superintendent PO Box 600 Grand Marais MN 55604
U10413 Grand Rapids Public Utilities Commission Anthony Ward General Manager PO Box 658 Grand Rapids MN 55744-0658	U10415 Granite Falls Munic. Elec. Light & Water De Donald Reznechek Superintendent Electri 641 Prentice Street Granite Falls MN 56241-1520	U10419 Grove City Electric Dept. David Martin General Manager PO Box 98 Grove City MN 56243-0098

U10439 Halstad Municipal Utilities Lucas Spaeth Supt. 405 2nd Ave. W. Halstad MN 56548	U10441 Hamlin (HD) Electric Coop. Annie Aberle Office Mgr. 423 3rd Ave So PO Box 1007 Clear Lake SD 57226	U10444 Harmony Water & Light Jerome Illg City Admin/Clerk/Treasurer PO Box 488 Harmony MN 55939
U10447 Hawley Public Utilities Comm. - Electric Kevin Berg Public Utilities Superintend PO Box 69 Hawley MN 56549-0069	U10449 Henning Power & Light D. Hagen Mgr. PO Box 55 Henning MN 56551	U10451 Hibbing Public Utilities-Electric Peter Karakash 1902 6th Ave E Hibbing MN 55746
U10464 Hutchinson Utilities Commission - Electric Jeremy Carter General Manager 225 Michigan St. S.E. Hutchinson MN 55350	U10266 Iowa Lakes Rural Electric Rick Olesen President/CEO 702 S 1st St Estherville IA 51334	U10489 Itasca-Mantrap Coop. Electric Assn. Michael Monsrud President/CEO PO Box 192 Park Rapids MN 56470
U10509 Jackson Electric Light Dept. Jennifer Bromeland City Administrator 80 West Ashley St Jackson MN 56143-1669	U10510 Janesville Municipal Utilities Clinton Rogers City Administrator PO Box O Janesville MN 56048-0617	U10541 Kandiyohi Power Cooperative Scott Froemming CEO 8605 47th St NE Spicer MN 56288-0040
U10542 Kandiyohi Public Utilities Susan Kidrowski Clerk PO Box 276 Kandiyohi MN 56251	U10543 Kasota Electric Light Dept. Rosie Sickler Clerk/Treasurer P. O. Box 218 Kasota MN 56050	U10546 Keewatin Public Utilities Michael LaBine City Supervisor P.O. Box 190 Keewatin MN 55753-0190
U10548 Kenyon Municipal Utilities Randy Eggert Operations Supt. 709 2nd Street Kenyon MN 55946	U10216 Lake Country Power Gregory Randa General Manager Grand Rapids Service Center 2810 Elida Drive Grand Rapids MN 55744	U10571 Lake Crystal Public Utilities Commission Taylor Gronau City Administrator PO Box 86 Lake Crystal MN 56055-0086
U10573 Lake Park Utilities Don Qualley Utility Supt. PO Box 239 Lake Park MN 56554-0239	U10574 Lake Region Electric Coop Tim Thompson CEO 1401 South Broadway P. O. Box 643 Pelican Rapids MN 56572	U10580 Lakefield Public Utilities Jim Koep Supt. PO Box 1023 Lakefield MN 56150-1023
U10582 Lanesboro Public Utilities Commission Michele Peterson City Admin. PO Box 333 Lanesboro MN 55949	U10584 LeSueur Municipal Utilities Greg Drent Electric Director 203 South 2nd Street LeSueur MN 56058	U10587 Litchfield Public Utilities Commission David Cziok City Administrator 126 Marshall Ave N Litchfield MN 55355
U10594 Luverne Municipal Utilities Rick Hoftiezer Utilities Director 305 E Luverne St. PO Box 659 Luverne MN 56156	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
U10639 Madelia Municipal Light & Power Dept. Jim Maras Manager 24 Abbott Ave SW Madelia MN 56062	U10641 Madison Municipal Utilities Don Fernholz Electric Supervisor 616 8th sT Madison MN 56256	U10645 Marshall Municipal Utilities Brad Roos General Mgr 113 S 4th St Marshall MN 56258

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

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

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

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

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

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

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

U10740  
Northwestern Wisconsin Electric Co.  
David M Dahlberg President  
PO Box 9  
104 South Pine Street  
Grantsburg WI 54840-0009

U10756  
Otter Tail Power Company  
Matthew Olsen Manager, Regulatory  
PO Box 496  
215 S Cascade St  
Fergus Falls MN 56538-0496

U10787  
People's Energy Cooperative  
Elaine Garry President/CEO  
1775 Lake Shady Ave S  
Oronoco MN 55960-2351

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

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

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

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

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

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

U10731  
North Star Electric Cooperative, Inc.  
Dan Hoskins General Manager  
441 St. Hwy. 172 NW  
P. O. Box 719  
Baudette MN 56623

U10747  
Olivia Municipal Water & Light Dept.  
Greg Lippert  
1009 W Lincoln Ave  
Olivia MN 56277

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

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

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

U10682  
Minnesota Valley Coop. Light & Power Ass  
Patrick C. Carruth General Manager  
501 S 1ST ST  
Montevideo MN 56265-2103

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

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

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

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

U12000  
Northern States Power Company dba Xcel  
Carl Cronin  
414 Nicollet Mall FL 7  
Minneapolis MN 55401

U10754  
Ortonville Light & Water Dept.  
Judy Roberts Depty City Clerk  
315 Madison Ave  
Ortonville MN 56278

U10772  
PKM Electric Cooperative, Inc  
Charles Riesen Mgr.  
406 North Minnesota Street  
PO Box 108  
Warren MN 56762

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

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

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

U10800  
Proctor Public Utilities Comm.  
Mark Casey City Administrator  
100 Pionk Drive  
Proctor MN 55810

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

U10831  
Red Lake Electric Coop.  
Roger Johanneck Mgr.  
PO Box 430  
Red Lake Falls MN 56750

U10833  
Red River Valley Coop. Power Assn.  
Lauren Brorby Manager  
P. O. Box 358  
Halstad MN 56548-0358

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

U10836  
Redwood Falls Public Utilities  
Charles Heins Supt.  
PO Box 526  
Redwood Falls MN 56283-0526

U12673  
Renville-Sibley Cooperative Power  
DeeAnne Newville CEO  
PO Box 68  
Danube MN 56230

U10843  
Rochester Public Utilities  
Mark Kotschevar General Manager.  
4000 East River Rd NE  
Rochester MN 55906-2813

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

U10850  
Roseau Munic. Power Plant  
Beth Hellquist City Clerk  
100 2nd Ave  
PO Box 307  
Roseau MN 56751

U10852  
Round Lake Municipal Utility  
Bruce Bentele Electric Sup.  
PO Box 72  
Round Lake MN 56167-0072

U10854  
Runestone Electric Assn.  
Kristin Dolan Gen. Mgr.  
6839 Power Lane SW  
Alexandria MN 56308

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

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

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

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

U10926  
Shelly Electric Dept.  
Jodean Neil Clerk  
PO Box 126  
Shelly MN 56581

U10940  
Sioux Valley Southwestern Electric Cooper  
Tim McCarthy General Manager/CEO  
PO Box 216  
Accounts Payable  
Colman SD 57017

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

U10936  
South Central Electric Association  
Ronald Horman Chief Executive Officer  
PO Box 150  
County Road 57 West  
St. James MN 56081

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

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

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

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

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

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

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

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

U10955  
Steele-Waseca Cooperative Electric  
Syd Briggs General Manager  
2411 W. Bridge St.  
PO Box 485  
Owatonna MN 55060-0485

U11012  
Todd Wadena Electric Coop.  
Robin Doege Operations Manager  
550 Ash Avenue NE  
PO Box 431  
Wadena MN 56482

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

U11062  
Virginia Dept. of Public Utilities - Electric  
Greg French General Manager  
618 2nd Street  
PO Box 1048  
Virginia MN 55792

U11082  
Warroad Munic. Light & Power Dept.  
Steven A Anderson Attorney  
PO Box 430  
Warroad MN 56763

U11094  
Westbrook Public Utilities  
Kelly Beaty  
556 1st Ave.  
P.O. Box 308  
Westbrook MN 56183-0308

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

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

U10956  
Stephen Electric Light Dept.  
Paul Rogus Public Works Superintendent  
PO Box 630  
Stephen MN 56757

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

U11023  
Two Harbors Water & Light Dept. - Electric  
Dan Walker Administrator  
522 1st Ave  
Two Harbors MN 55616-1504

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

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

U11103  
Wild Rice Electric Coop.  
S. J. Haaven Mgr.  
PO Box 438  
Mahnomon MN 56557

U11110  
Winthrop Municipal Electric Plant  
Jenny Hazelton City Administrator  
305 North Main Street  
PO Box Y  
Winthrop MN 55396

U11011  
Thief River Falls Water & Light Dept.  
Dale Narlock Director  
123 Main Avenue North  
PO Box 528  
Thief River Falls MN 56701

U11019  
Tri-County Electric Cooperative  
Brian Krambeer President, CEO  
210 West Jessie Street  
PO Box 626  
Rushford MN 55971-0626

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

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

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

U11104  
Willmar Munic. Utilities Comm.  
Wesley K Hompe General Manager  
PO Box 937  
700 Litchfield Ave SW  
Willmar MN 56201

U11117  
Worthington Public Utilities  
Scott Hain General Manager  
318 Ninth St.  
PO Box 458  
Worthington MN 56187