

VIA ELECTRONIC MAIL AND EFS

September 15, 2023

Minnesota Department of Commerce
Energy Environmental Review and Analysis Unit
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Minnesota Public Utilities Commission
Will Seuffert
Executive Secretary
121 7th Place East, Suite 350
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Re: *In Re Application of Minnesota Power for a Certificate of Need for the HVDC Modernization Project in Hermantown, Saint Louis County, Docket No. E015/CN-22-607*

In Re Application of Minnesota Power for a Route Permit for a High Voltage Transmission Line for the HVDC Modernization Project in Hermantown, Saint Louis County, Docket No. E-015/TL-22-611

Scoping Comments on Environmental Assessment

Dear Ms. Ness and Mr. Seuffert:

On August 4, 2023 and September 12, 2023, the Minnesota Public Utilities Commission (“Commission”) and Minnesota Department of Commerce (“Department”) issued a notice requesting comments on the scope of the Environmental Assessment (“EA”) being prepared in the above-captioned dockets.¹ I am writing in response to those notices to provide comments on behalf of American Transmission Company LLC, by and through its corporate manager, ATC Management Inc. (collectively, “ATC”).

¹ See Minn. Pub. Utilities Comm’n, *Notice of Public Information and Environmental Assessment Scoping Meetings* (Aug. 4, 2023) (Document ID 20238-198002-01) (hereinafter, “Notice”), available at <https://tinyurl.com/3da5pusd>; Minn. Pub. Utilities Comm’n, *Notice of Extended Public Comment Period* (Sept. 12, 2023) (Document ID 20239-198883-02), available at <https://tinyurl.com/3uayrup7>.

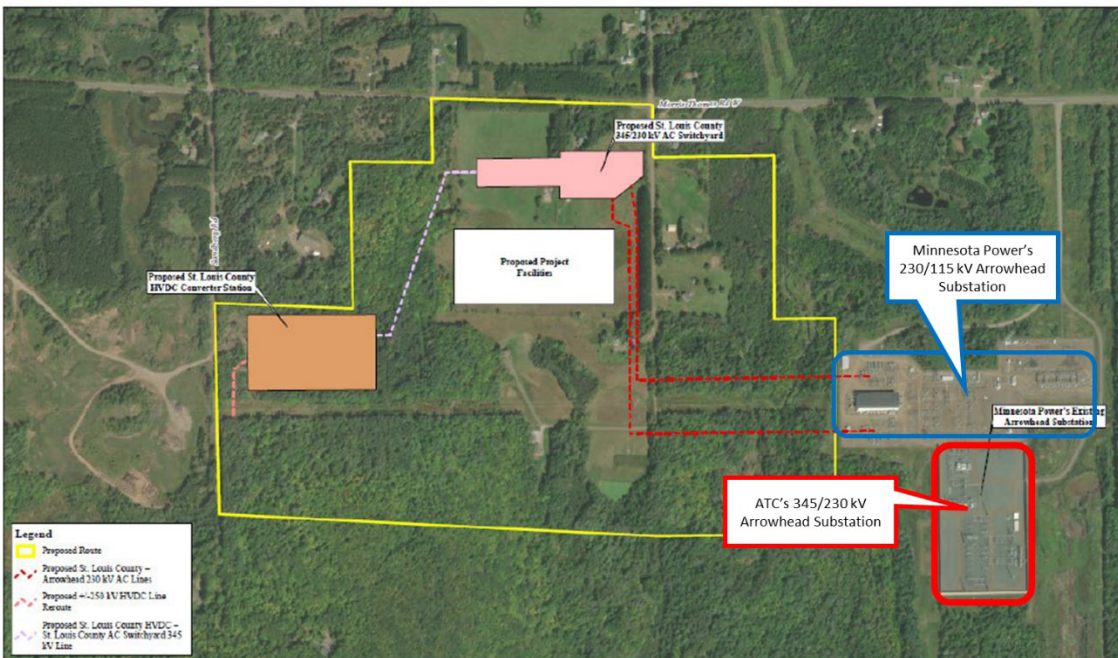
The Notice requests comment on (among other things) the potential impacts of Minnesota Power’s (“MP” or “Applicant”) proposed High-Voltage Direct Current (“HVDC”) Modernization Project in Hermantown (the “Project”); potential means of minimizing, mitigating, or avoiding those impacts; and potential alternative routes or route segments that should be considered to reduce those impacts.² As discussed in greater detail below, ATC recommends that the EA study in detail—and that the Commission ultimately adopt—the following alternative: eliminating the Applicant’s proposed new St. Louis County 345/230-kV Substation and instead connecting the Applicant’s new HVDC terminal to the alternating current (“AC”) bulk electric transmission system through ATC’s existing 345/230-kV Arrowhead substation. This alternative will achieve the same needs that the Project is intended to address while reducing Project costs and impacts to the surrounding environment and community.

DISCUSSION

A. Background

ATC is a transmission-only utility whose sole purpose is to plan, construct, operate, maintain, and expand the high-voltage electric transmission system in portions of Wisconsin, Michigan, Minnesota, and Illinois. The company owns, operates, and maintains over 10,000 miles of electric transmission lines and more than 580 electric substations across these states. In Minnesota, ATC is a Minnesota Transmission Owner and owns the Arrowhead 345/230-kV Substation located in Hermantown, while the Applicant owns the adjoining Arrowhead 230/115-kV Substation. The figure below (which is taken from MP’s application in this proceeding) depicts the location of ATC’s 345/230-kV Arrowhead Substation (in red) and the Applicant’s 230/115-kV Substation (in blue), relative to the location of the Project.

Figure 2-1 – HVDC Modernization Project Route



² *Id.*

As shown in the figure above, the Applicant is seeking a certificate of need and route permit to construct, modernize, and upgrade the HVDC terminals associated with its 465-mile long 250-kV Square Butte HVDC transmission line.³ In Minnesota, the Applicant states that this project would involve (among other things):

- (1) the construction of a new HVDC terminal in Hermantown;
- (2) a short reroute of the Applicant's existing 250-kV Square Butte HVDC transmission line into the new HVDC terminal;
- (3) removal/decommissioning of a short (less than one-mile) portion of the existing 250-kV Square Butte HVDC transmission line between the new HVDC terminal and the Arrowhead Substation;
- (4) construction of a new St. Louis County 345-kV Substation, approximately one-half mile west of the Applicant's 230/115-kV Arrowhead Substation and ATC's 345/230-kV Arrowhead Substation;
- (5) construction of a new 345-kV transmission line, less than one mile in length, between the new HVDC terminal and new 345-kV St. Louis County Substation; and
- (6) construction of two new, parallel 230-kV large high-voltage transmission lines of less than one mile in length, which would connect the new St. Louis County Substation and the Applicant's 230/115-kV Arrowhead Substation.⁴

The Applicant states that the Project is needed to “modernize aging HVDC assets that are critical to the grid, continue to position the grid for the clean energy transition, and improve the reliability of the transmission system in Minnesota and North Dakota.”⁵

With respect to the new St. Louis County Substation, the Applicant states that this facility is required to interconnect the new HVDC terminal in Hermantown to the AC bulk electric transmission system.⁶ Specifically, the new HVDC terminal “will convert the DC electricity [from the Square Butte HVDC transmission line] into AC and will interconnect to the AC transmission system at 345-kV via a short 345 kV transmission line to the St. Louis County Substation.”⁷ The new St. Louis County Substation would then interconnect to the Applicant's existing Arrowhead substation via two parallel 230-kV transmission lines, at which point the electricity would be transmitted throughout the existing transmission system.⁸

³ See *Certificate of Need & Route Permit Application for the HVDC Modernization Project – Minnesota Power*, Docket Nos. E015/TL-22-611 & E015/CN-22-607, at 2–4 (Jun. 2023) (Doc. ID 20236-196333-03), available at <https://tinyurl.com/pmpywspf>.

⁴ *Id.* at 2–4 and Map 1.

⁵ *Id.*

⁶ *Id.* at 3, 8.

⁷ *Id.* at 8–9.

⁸ *Id.* at 8.

As additional justification for constructing the new St. Louis County Substation less than one-half mile from ATC's existing Arrowhead 345/230-kV Substation, the Applicant notes that "[a]s the regional transmission system continues to develop to support the clean energy transition, the near-term focus has been on developing a strong 345 kV backbone network."⁹ Accordingly, the Applicant states that the new substation

[W]ill be designed with room for several future 345 kV line additions to accommodate regional transmission development in conjunction with increasing capacity and utilization of the HVDC line. The new substation will also include space to accommodate a second 345 kV/230 kV transformer to facilitate expanded delivery of power to the local transmission system in northeastern Minnesota. New 345 kV and 230 kV transmission lines constructed for the Project will be designed with sufficient capacity to accommodate reasonably foreseeable long-term needs, and Minnesota Power will consider making new transmission structures double-circuit capable where appropriate.¹⁰

B. Impacts Associated with New Substation and Transmission Facilities

The application generally describes the impacts associated with the Project and, to some extent, the proposed new substation and associated transmission facilities.¹¹ Specifically, the application notes the following:

- (1) Right-of-way ("ROW") clearing and construction of the new substation and HVDC terminal "will have the most visual impacts in areas close to roads and residential areas."¹²
- (2) The new substation will permanently impact up to four (4) acres of land previously used for agriculture, and the transmission lines will impact up to 3.5 acres of agricultural lands.¹³
- (3) The new substation will permanently impact up to 0.75 acres of delineated wetlands, whereas the new transmission lines will temporarily impact up to 2.44 acres of wetlands.¹⁴
- (4) The Project will require clearing of approximately 26 acres of forested land.¹⁵
- (5) The two new 230-kV transmission lines connecting the new substation to MP's existing Arrowhead Substation will cross a small stream (West Rocky Run Creek), which is a designated trout stream and Minnesota Public Water.¹⁶

⁹ *Id.* at 39.

¹⁰ *Id.* at 11.

¹¹ *Id.* at 65–101.

¹² *Id.* at 72.

¹³ *Id.* at 78.

¹⁴ *Id.* at 88–89.

¹⁵ *Id.* at 93.

¹⁶ *Id.* at 87.

Thus, while the application does examine the impacts associated with the Project, it does not in all instances clearly delineate which of these impacts are specifically associated with construction of (a) the new HVDC terminal; (b) the extension of the HVDC line to the new HVDC terminal; (c) the new 345-kV transmission line connecting that terminal to the new St. Louis County Substation; (d) the new St. Louis County Substation; or (e) the two new 230-kV transmission lines connecting the new substation to the Applicant's existing Arrowhead 230/115-kV Substation. ATC recommends that the EA clearly identify and delineate the impacts that each of these Project facilities will have on surrounding resources (i.e., wetlands, waterbodies, cultural resources, flora and fauna, threatened and endangered resources, etc.) and land cover types (i.e., wooded areas, developed land, agricultural land, grassland, etc.).

C. Costs Associated With New Substation and Transmission Facilities

The application indicates that the cost of the "Minnesota Interconnection Facilities" will range from \$40 million to \$70 million, in 2022 dollars.¹⁷ The "Minnesota Interconnection Facilities" are defined to include

[T]he short extension of the HVDC line to the [HVDC] Converter Station, as well as all 345 kV and 230 kV facilities from the HVDC Converter Station to the Arrowhead Substation. This includes the new St. Louis County 345/230 kV Substation, rebuilding existing 230 kV bus sections at Arrowhead, and constructing new 345 kV and 230 kV lines for the Project.¹⁸

Given the Project's expected in-service date of somewhere between December 2028 and April 2030, the application indicates that these cost estimates are "based on preliminary engineering considerations," with an upper and lower range provided "to illustrate contingencies in cost estimating assumptions."¹⁹ Moreover, these cost estimates are in 2022 dollars and do not count for inflation.²⁰

ATC understands the difficulty in providing precise cost estimates for each Project component at this stage of project development, since detailed engineering is likely not yet complete and pricing could be impacted by market forces, such as inflation and commodities pricing.²¹ However, ATC recommends that the Applicant provide and the EA specifically identify and address cost estimates associated with each of the following Project facilities: (a) the extension of the HVDC line to the new HVDC converter station; (b) the new 345-kV transmission line connecting the new HVDC terminal to the new St. Louis County Substation; (c) the new St. Louis County 345/230 kV Substation; (d) the two new 230-kV transmission lines connecting the new substation to the Applicant's existing Arrowhead 230/115-kV Substation; and (e) upgrades/rebuild activities within the Applicant's Arrowhead 230/115-kV Substation that will be needed as a result of the Project.

¹⁷ *Id.* at 12.

¹⁸ *Id.* at 13.

¹⁹ *Id.* at 12.

²⁰ *Id.*

²¹ *Id.*

D. The Proposed Alternative to Leverage ATC's Arrowhead 345/230-kV Substation

As described above, the Project involves (among other things) the construction of the new 345/230-kV St. Louis County Substation, which will interconnect the new HVDC terminal to the Applicant's existing 230/115-kV Arrowhead Substation. The Applicant essentially states that this new substation is needed to (1) interconnect the new HVDC terminal to the existing AC bulk electric transmission system at 345 kV,²² and (2) accommodate future regional transmission development, as space will be reserved for a second 345/230-kV transformer that may be needed in the future.

ATC respectfully submits that the EA should study and evaluate—and that the Commission should ultimately adopt—an alternative that would avoid the need to construct the new St. Louis County 345/230-kV Substation altogether, which would reduce Project costs and impacts. This alternative would essentially involve interconnecting the new HVDC terminal directly to ATC's existing Arrowhead 345/230-kV Substation through two approximately one-mile 345-kV transmission lines. To minimize impacts, the new 345-kV transmission lines could be constructed in a double-circuit configuration. These lines would re-use a portion of the ROW currently used for the 250-kV Square Butte transmission line that is located between the new HVDC terminal and ATC's Arrowhead 345/230 kV Substation, as the Applicant states that this segment of the Square Butte line will be removed/decommissioned as part of the Project.²³ A map depicting this proposed alternative is provided in Exhibit A to these comments (the "Arrowhead Alternative").

The Arrowhead Alternative effectively leverages use of existing utility infrastructure in the area, rather than requiring the construction of new infrastructure. As the application acknowledges, the new 345/230-kV St. Louis County Substation would be located less than one mile from ATC's existing 345-kV Arrowhead Substation, and ATC estimates this distance to be less than one-half mile.²⁴ The Applicant asserts that this new substation is needed to interconnect the new HVDC terminal to the AC bulk electric transmission system at 345-kV and accommodate future transmission buildout.

However, an entirely new substation is not needed to achieve these purposes. Rather than build the new substation—as well as the various 345-kV and 230-kV transmission lines needed to connect the new HVDC terminal and substation to the Applicant's existing Arrowhead 230/115-kV substation—the Applicant could simply interconnect the new HVDC terminal directly to ATC's existing Arrowhead 345/230-kV Substation through two new approximately one-mile 345-kV lines, constructed in double-circuit configuration and primarily in existing ROW.

²² *Id.* at 39, 40. The Applicant notes that "it considered interconnecting the new HVDC converters directly to the 230 kV system. This would involve designing the HVDC converter transformers with a 230 kV winding on the AC system side rather than a 345 kV winding, and then building new 230 kV bus and transmission to connect to Arrowhead. While this alternative would have a lower cost in the near term, the long-term cost would likely be significantly higher than developing an initial interconnection at 345 kV." The Applicant goes on to state that "it will become increasingly important for the HVDC system to be directly interconnected to the regional 345 kV network, rather than the underlying local 230 kV network. However, to move the point of interconnection from the 230 kV system to the 345 kV system at a later date would require an expensive replacement of the converter transformers to change the winding voltage on the AC-system side."

²³ *Id.* at 3, 9.

²⁴ *Id.* at 8.

There is more than sufficient space within ATC’s Arrowhead 345/230-kV Substation to accommodate such an alternative, as well as potential future transmission expansion in the area. ATC’s Arrowhead 345/230-kV Substation is designed—and currently has available room within the existing substation footprint—to accommodate interconnecting the 345-kV lines from the new HVDC converter station. This alternative would achieve the same purpose as the Applicant’s proposal—namely, connecting the Square Butte HVDC line and terminals to the AC bulk electric system at 345-kV. Moreover, ATC’s existing Arrowhead Substation has sufficient space—and the surrounding area enables the ability to expand that substation—to accommodate an expansion that would allow for potential future transmission development, including up to 3,000 MW of capacity on the Square Butte HVDC line. The Applicant has publicly stated that the upgrades to the Square Butte HVDC line will “[b]e expandable, for efficiently developing up to a 3,000 megawatt corridor to further optimize regional energy flows.”²⁵ A map depicting an example of a design for expanding ATC’s Arrowhead 345/230-kV Substation to accommodate this amount of capacity is provided in Exhibit B.

In addition to satisfying the purpose and need of the Project, the Arrowhead Alternative would also reduce costs associated with the Project—namely, the St. Louis County Substation and associated lines to connect the new HVDC converter station to the AC system at 345-kV. ATC developed a planning level cost estimate for this alternative, which covers construction of new, double-circuited approximately one-mile 345-kV transmission lines between the new HVDC terminal and ATC’s Arrowhead Substation and upgrades/construction activities that would be needed to interconnect those lines with the HVDC terminal and ATC’s Arrowhead 345/230-kV Substation. Based on this analysis, ATC estimates that the Arrowhead Alternative would have a cost of approximately \$34 Million (in 2022 dollars), as compared to the Applicant’s \$40 to \$70 million (in 2022 dollars) cost estimate for the “Minnesota Interconnection Facilities” portion of the Project.²⁶

Finally, the Arrowhead Alternative will also reduce the environmental impacts associated with the proposed Project. As noted above, the Applicant is proposing to remove/retire an approximately one-mile-long segment of the Square Butte 230-kV HVDC line located between the new HVDC terminal and the Arrowhead Substation. The Arrowhead Alternative would rely on this existing ROW to interconnect the new HVDC terminal to the Arrowhead Substation through two new, double-circuited approximately one-mile-long 345-kV lines. While this alternative would require some tree-clearing, most of the transmission facilities associated with this alternative would be effectively re-using existing ROW, rather than clearing new ROW for the new 345-kV and 230-kV transmission facilities the Applicant is currently proposing. Indeed, approximately 60 percent of the ROW for the new 345-kV transmission lines associated with the Arrowhead Alternative would share ROW with the (to-be decommissioned) segment of the Applicant’s Square Butte HVDC transmission line.

²⁵ See Minnesota Power, *HVDC Modernization Project* (Nov. 29, 2022), available at <https://tinyurl.com/22vmedxr>.

²⁶ ATC’s \$34 million cost estimate includes a 10 percent contingency.

A more detailed analysis of the land cover impacts associated with the Arrowhead Alternative is provided in Table 1, below.²⁷ As indicated, the Arrowhead Alternative impacts fewer acres of forested land and agricultural land when compared to the Applicant’s proposal.

Table 1: Estimated Land Cover Impacts of Arrowhead Alternative

Land Cover Type	Impact (Acres)
Forest/Shrubs	17.35
Developed	0.61
Agricultural/Cropland	2.35
Grassland	0
Wetlands	0 ²⁸
Total	20.3

E. Conclusion

As discussed above, ATC recommends that the EA for the Project:

- (1) Specifically identify and delineate environmental impacts associated with the construction and operation of the following Project facilities: (a) the new HVDC terminal; (b) the extension of the HVDC line to the new HVDC terminal; (c) the new 345-kV transmission line connecting that terminal to the new St. Louis County Substation; (d) the new St. Louis County Substation; or (e) the two new 230-kV transmission lines connecting the new substation to the Applicant’s existing Arrowhead 230/115-kV Substation.

- (2) Specifically identify and delineate cost estimates associated with each of the following Project facilities: (a) the extension of the HVDC line to the new HVDC converter station; (b) the new 345-kV transmission line connecting the new HVDC terminal to the new St. Louis County Substation; (c) the new St. Louis County 345/230 kV Substation; (d) the two new 230-kV transmission lines connecting the new substation to the Applicant’s existing Arrowhead 230/115-kV Substation; and (e) upgrades/rebuild activities within the Applicant’s Arrowhead 230/115-kV Substation that will be needed as a result of the Project.

- (3) Study, evaluate, and adopt the proposed Arrowhead Alternative as a preferred alternative to the Applicant’s proposal to construct the new 345-kV St. Louis County Substation as part of the Project.

²⁷ This analysis assumes the use of a 150-foot wide ROW.

²⁸ ATC notes that the quantification of wetland impacts in Table 1 is based on the United States Geological Service GIS dataset underlying Map 9 to the application, which does not depict any wetlands in the Project Study Area. However, Map 7c does depict wetlands along ATC’s proposed route for the Arrowhead Alternative; ATC understands that these wetlands were field delineated by the Applicant in August and September 2022. While the Arrowhead Alternative would result in some impacts to these wetlands, ATC is unable to specifically quantify those impacts at this time because it does not have access to the GIS dataset used to create Map 7c.

/s/ David R. Zoppo

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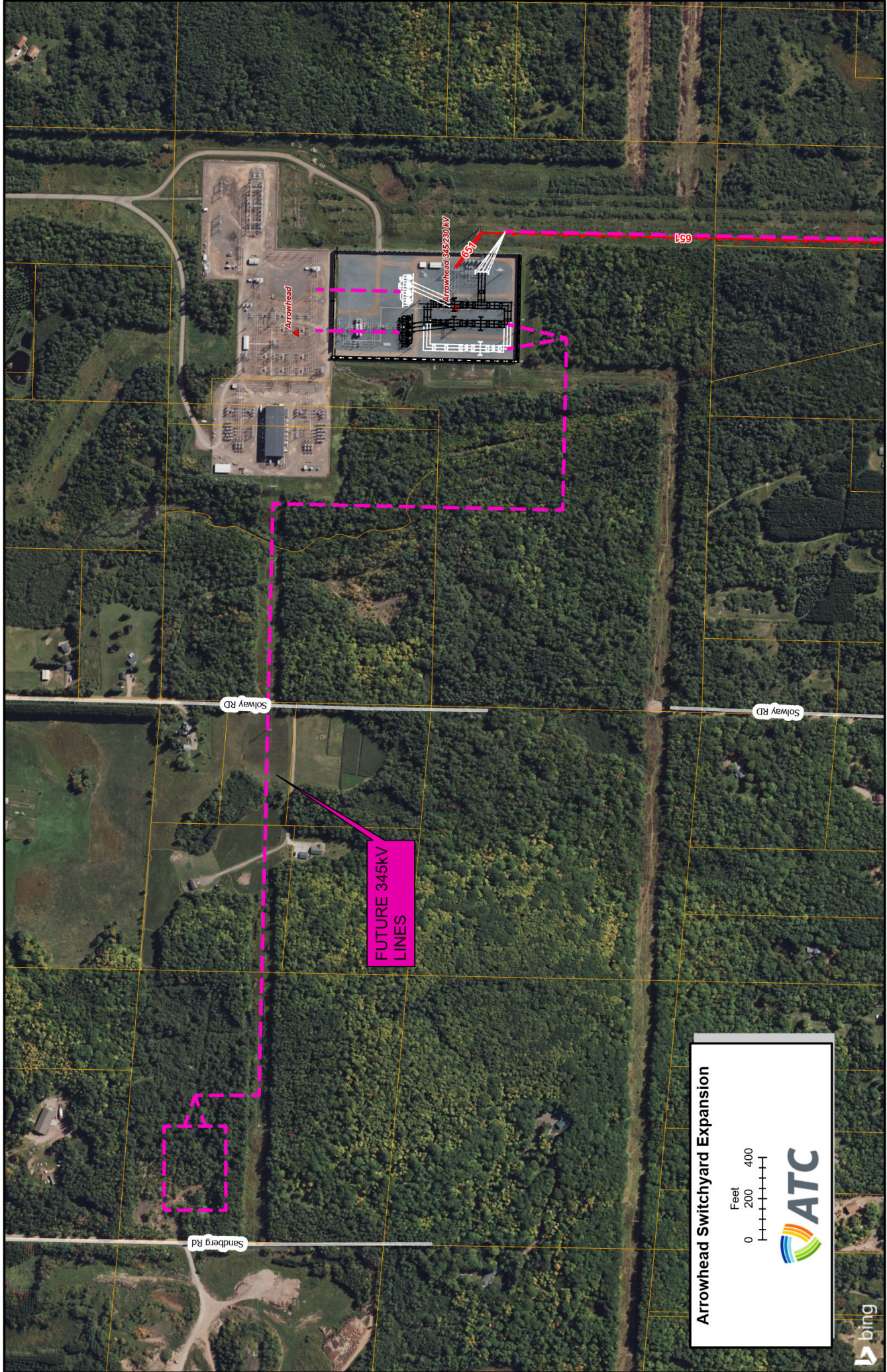
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Exhibit A: Conceptual Layout for Arrowhead Alternative

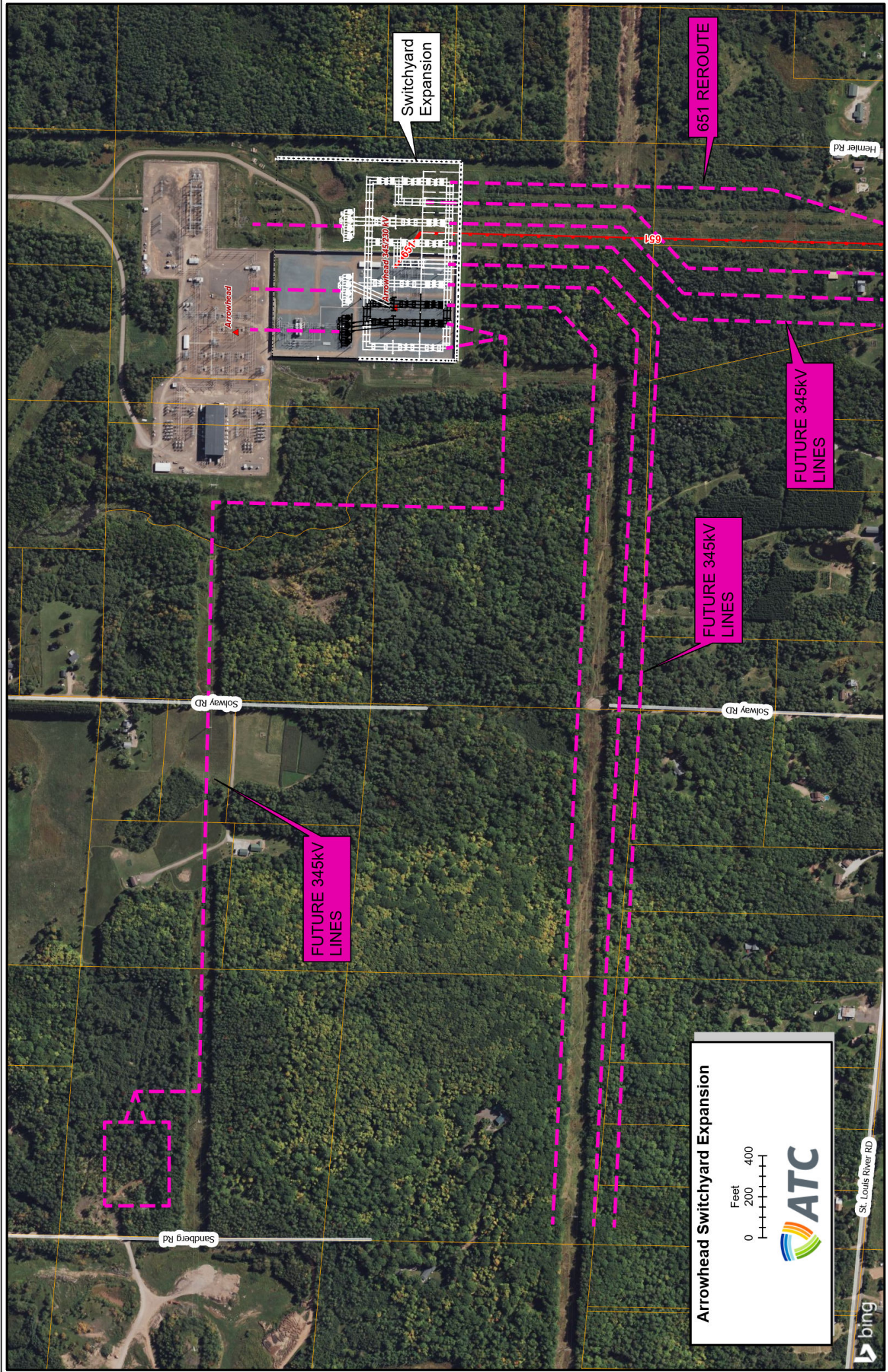


FUTURE 34.5kV LINES

Arrowhead Switchyard Expansion

Feet
0 200 400

Exhibit B: Conceptual Design for Future Arrowhead Expansion



Switchyard Expansion

651 REROUTE

FUTURE 345kV LINES

FUTURE 345kV LINES

FUTURE 345kV LINES

Arrowhead Switchyard Expansion

Feet
0 200 400

St. Louis River RD

Henkle Rd

Sandberg Rd

Solway Rd

Solway Rd



CERTIFICATE OF SERVICE

I, David R. Zoppo, hereby certify that I have this day served a true and correct copy of the following document(s) by electronic filing, electronic mail, courier, interoffice mail, or by depositing the same enveloped with postage paid in the United States to all persons at the addresses indicated below or on the attached Service List on file with the Minnesota Public Utilities Commission in the below referenced dockets.

ATC'S WRITTEN SCOPING COMMENTS ON ENVIRONMENTAL ASSESSMENT

In the Matter of the Application of Minnesota
Power for a Certificate of Need for the HVDC
Modernization Project in Hermantown, Saint
Louis County
MPUC Docket No. E-015/CN-22-607

In the Matter of the Application of Minnesota
Power for a Certificate of Need for the HVDC
Modernization Project in Hermantown, Saint
Louis County
MPUC Docket No. E-015/CN-22-607

Dated this 15th day of September, 2023

/s/ David R. Zoppo

David R. Zoppo

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Angela	Piner	angela.piner@hdrinc.com	HDR, Inc.	Suite 600 701 Xenia Avenue South Suite 600 Minneapolis, MN 55416	Electronic Service	No	OFF_SL_22-607_Official
Larry	Rabman	larryemls@hotmail.com	EMLS, Inc	PO Box 122 Appleton, MN 56208	Electronic Service	No	OFF_SL_22-607_Official
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_22-607_Official
Margaret	Rheude	Margaret_Rheude@fws.gov	U.S. Fish and Wildlife Service	Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington, MN 55425	Electronic Service	No	OFF_SL_22-607_Official
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_22-607_Official
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_22-607_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_22-607_Official
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_22-607_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Slukich	tom@nationalconductor.com	National Conductor Constructors	1819 Hwy 371 North Brainerd, MN 56401	Electronic Service	No	OFF_SL_22-607_Official
Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy	10 Second Street NE Ste 400 Minneapolis, MN 55410	Electronic Service	No	OFF_SL_22-607_Official
Mark	Strohnfus	mstrohnfus@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_22-607_Official
Carl	Strohm	cjsmg@sbcglobal.net	SBC Global	105 East Edgewood Ave Indianapolis, IN 46227	Electronic Service	No	OFF_SL_22-607_Official
Tom	Swafford	tswafford@umsius	Utility Mapping Services, Inc	3947 E Calvary Rd Suite 103 Duluth, MN 55803	Electronic Service	No	OFF_SL_22-607_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_22-607_Official
Todd	Tadych	ttadych@atcllc.com	American Transmission Company LLC	5303 Fen Oak Dr Madison, WI 53718	Electronic Service	No	OFF_SL_22-607_Official
Jayne	Trusty	execdir@swrdc.org	SWRDC	2401 Broadway Ave #1 Slayton, MN 56172	Electronic Service	No	OFF_SL_22-607_Official
Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency	Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago, IL 60604-3590	Electronic Service	No	OFF_SL_22-607_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-607_Official
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, MN 55155-4040	Electronic Service	No	OFF_SL_22-607_Official
Elizabeth	Wefel	ewefel@flaherty-hood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_22-607_Official
Alan	Whipple	sa.property@state.mn.us	Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul, MN 551463340	Electronic Service	No	OFF_SL_22-607_Official
Deanna	White	mncwa@cleanwater.org	Clean Water Action & Water Fund of MN	330 S 2nd Ave Ste 420 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-607_Official
Rachel	Wiedewitsch	wiedewitsch@fresh-energy.org	Fresh Energy	408 St Peter St #350 St. Paul, MN 55102	Electronic Service	No	OFF_SL_22-607_Official
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury, MN 55125	Electronic Service	No	OFF_SL_22-607_Official

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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_22-611_Official
Adam	Duininck	aduininck@hcsccc.org	North Central States Regional Council of Carpenters	700 Olive Street St. Paul, MN 55130	Electronic Service	No	OFF_SL_22-611_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_22-611_Official
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_22-611_Official
Dan	McCourtney	dmccourtney@mnpower.com	Minnesota Power	30 West Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_22-611_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-611_Official
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_22-611_Official
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_22-611_Official
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_22-611_Official