

STATE OF MINNESOTA  
OFFICE OF ADMINISTRATIVE HEARINGS  
FOR THE PUBLIC UTILITIES COMMISSION

In the Matter of the 2023 Annual Power Plant Siting Act Hearing      **REPORT TO THE COMMISSION**

On November 2, 2023, the Public Utilities Commission (PUC or Commission) requested that the Office of Administrative Hearings conduct, on its behalf, the 2023 Annual Hearing on Power Plant Siting and Transmission Lines Routing Programs, under Minn. Stat. § 216E.07 (2022) and Minn. R. 7850.5400 (2023). Administrative Law Judge Christa L. Moseng was assigned to preside over the public hearing. The Commission issued a Notice for the hearing on November 28, 2023.<sup>1</sup>

The hearing commenced at 10:00 a.m. on December 20, 2023, in person and using the Cisco WebEx teleconferencing platform. The hearing record closed at 4:30 p.m. on January 12, 2024, at the end of the published public comment period.<sup>2</sup>

The Annual Hearing has two key purposes. First, it is meant to advise the public of matters relating to the siting of large electric power generating plants and routing of high voltage transmission lines. Second, it affords interested persons an opportunity to be heard regarding the Commission's activities, duties, and policies pursuant to the Power Plant Siting Act (PPSA).<sup>3</sup>

**I. Notice of Annual Hearing**

Minn. Stat. § 216E.07 and Minn. R. 7850.5400 require that the Commission hold a public hearing each year to afford interested persons an opportunity to be heard on any matter relating to the siting of large electric generating power plants and the routing of high-voltage transmission lines. At the hearing, the Commission must inform the public of the permits issued by the Commission in the past year.<sup>4</sup> The Commission must provide at least 10 days', but no more than 45 days', notice of the annual hearing, along with a tentative agenda for the hearing.<sup>5</sup> The hearing notice must be mailed to or served

---

<sup>1</sup> See Exhibit (Ex.) 1 (Notice of Power Plant Siting Act Annual Hearing, (Nov. 28, 2023) (eDockets No. [202311-200773-01](#))).

<sup>2</sup> Ex. 1 at 3.

<sup>3</sup> See Minn. Stat. § 216E.07; Minn. R. 7850.5400, subp. 2.

<sup>4</sup> Minn. Stat. § 216E.07; Minn. R. 7850.5400, subp. 1.

<sup>5</sup> Minn. Stat. § 216E.07; Minn. R. 7850.5400, subp. 2.

electronically on those persons who have requested notice and must be published in *Environmental Quality Board (EQB) Monitor* and on the Commission's calendar.<sup>6</sup>

On November 28, 2023, the Commission served, by U.S. Mail or electronic mail,<sup>7</sup> the Notice of the Power Plant Siting and Transmission Line Routing Program Annual Hearing (Notice of Hearing) on those persons who requested notice.<sup>8</sup> The Notice of Hearing contained an agenda for the hearing, as required by Minn. R. 7850.5400.<sup>9</sup> On November 28, 2023, the *EQB Monitor* (an electronic newsletter issued by the Environmental Quality Board) published the Notice of Hearing.<sup>10</sup> The Commission also posted the Notice of Hearing on the Commission's online calendar throughout the notice and public comment periods.<sup>11</sup>

Representatives from the Commission, Minnesota Department of Commerce (DOC), and Department of Natural Resources (DNR) attended the hearing and gave presentations. Two members of the public attended the hearing and provided comments: Kristen Eide-Tollefson and Carol A. Overland.<sup>12</sup> The DOC's Energy Environmental Review and Analysis unit (EERA);<sup>13</sup> the Minnesota Department of Transportation (MnDOT or DOT);<sup>14</sup> and Overland submitted written comments.<sup>15</sup> All comments submitted by the comment deadline are summarized below.<sup>16</sup>

## II. Introductions and Agency Presentations

Sam Lobby, a Commission staff member, explained the work of the Commission's Energy Facilities Permitting Unit.<sup>17</sup>

Ray Kirsch, a staff member with the EERA, explained the EERA's work and cooperation with the Commission.<sup>18</sup> Kirsch noted that the EERA filed a summary of the projects that the Commission permitted in 2023 or that were in the permitting process, including solar and wind farm projects and associated power lines.<sup>19</sup> He provided an overview of the landscape for environmental review and permitting of energy facilities in

<sup>6</sup> Minn. Stat. § 216E.07; Minn. R. 7850.5400, subp. 2.

<sup>7</sup> Minn. Stat. § 216.17, subd. 2 (2022), permits service of notices by electronic mail.

<sup>8</sup> See Ex. 1 at Certificate of Service and Service List (Nov. 28, 2023).

<sup>9</sup> Ex. 1 at 3.

<sup>10</sup> *Minnesota Environmental Quality Board Monitor*, Vol. 47, No. 48 (Nov. 28, 2022), 3–4, available at <https://www.eqb.state.mn.us/sites/eqb/files/documents/Nov%2028%2C%202023.pdf>.

<sup>11</sup> See PUC Calendar, <https://mn.gov/puc/about-us/calendar/> (last visited on Jan. 25, 2023).

<sup>12</sup> Public Hearing Transcript (Hearing Tr.) at 22–28 (Eide-Tollefson Oral Comments) and 28–59 (Overland Oral Comments).

<sup>13</sup> EERA Summary (eDockets No. [202312-201090-01](#)).

<sup>14</sup> MnDOT Comments (eDockets No. [20241-202101-01](#)).

<sup>15</sup> Overland Written Comments (eDockets Nos. [202312-201526-01](#), [202312-201516-01](#), [202312-201545-01](#), [20241-201780-01](#), [20241-201774-02](#), [20241-201774-01](#)). Ms. Overland also submitted eDockets No. [202312-201562-01](#), which appears to be a duplicate of [202312-201545-01](#).

<sup>16</sup> Communities United for Responsible Energy (CURE) submitted comments received on January 17, 2024. (eDockets No. [20241-202272-01](#)). Because they were filed after the comment deadline they are not summarized in this Report but are noted for the Commission.

<sup>17</sup> Hearing Tr. at 5-8.

<sup>18</sup> Hearing Tr. at 8–13.

<sup>19</sup> EERA Summary (eDockets No. [202312-201090-01](#)).

2023. In particular, he highlighted: some of the “numerous” legislative changes from the most recent legislative session;<sup>20</sup> what he described as an ongoing “substantial build-out of transmission line infrastructure” in Minnesota, including three transmission line projects described as MISO’s<sup>21</sup> “Tranche 1”;<sup>22</sup> the ongoing environmental review of the first proposed carbon dioxide pipeline in Minnesota;<sup>23</sup> progress on work by EERA to improve the usability of its website; and, EERA research regarding the ecosystem benefits of solar farms.<sup>24</sup>

Cynthia Warzecha, staff member of the DNR, provided comments about the DNR’s participation in power plant siting.<sup>25</sup> The DNR provides licenses for power lines to cross public lands and waters.<sup>26</sup> The DNR also provides input to the utility permitting process by considering and sharing concerns regarding wildlife and natural resources with involved parties.<sup>27</sup> The DNR coordinates with applicants early in the permitting process to provide them with information and technical expertise about proposed project impacts on natural resources and potential permitting conflicts.<sup>28</sup> The DNR provides the Commission with data and options necessary for its balancing of environmental impacts with other power plant siting factors.<sup>29</sup> Warzecha described DNR’s work on two interagency working groups: a working group addressing vegetation management plans and an interagency energy working group, each led by EERA.<sup>30</sup>

Warzecha thanked the Commission for consistently including DNR-recommended permit conditions for facility lighting, dust control, and wildlife-friendly erosion control materials, noting that the consistency results in consistent project construction and operations, and improves project sites throughout the state.<sup>31</sup>

She noted that DNR participated in three permitting reform meetings held by PUC. DNR supports early coordination efforts as critical to identify concerns early in the permitting process and urged that reforms to the permitting process “need to allow for adequate time for scoping of issues, comprehensive environmental review and agency input and public participation.”<sup>32</sup>

Finally, Warzecha noted that cumulative avian and bat impacts remain a serious concern, and that DNR looks forward to working with EERA and the Commission to reduce fatalities at existing, new, and re-powered wind projects.<sup>33</sup>

---

<sup>20</sup> Hearing Tr. at 9.

<sup>21</sup> Midcontinent Independent System Operator.

<sup>22</sup> Hearing Tr. at 11.

<sup>23</sup> Hearing Tr. at 12.

<sup>24</sup> *Id.*

<sup>25</sup> Hearing Tr. at 13–17.

<sup>26</sup> Hearing Tr. at 13.

<sup>27</sup> Hearing Tr. at 13–14.

<sup>28</sup> Hearing Tr. at 14.

<sup>29</sup> *Id.*

<sup>30</sup> Hearing Tr. at 14–15.

<sup>31</sup> Hearing Tr. at 15–16.

<sup>32</sup> Hearing Tr. at 16.

<sup>33</sup> Hearing Tr. at 17.

### III. Summary of Public Comments

#### A. Oral Comments

##### i. Kristen Eide-Tollefson

Eide-Tollefson began her comments by summarizing her history of participating in past Power Plant Siting Act annual hearings and other Commission proceedings, beginning with her appointment to an EQB task force.<sup>34</sup> She stated that she appreciated the opportunity provided by the annual hearing to hear from the agencies involved in permitting.<sup>35</sup>

Eide-Tollefson expressed that what motivated her to attend this year's hearing was an article about solar installers and their challenges to interconnecting to Xcel's system.<sup>36</sup> She stated that she hoped to learn more about how the Commission ensures opportunities for installing distributed generation, including how such things are implemented and documented by the Commission or by utilities.<sup>37</sup> She commented that the topic could become more important in light of statewide energy goals for 2040 and 2050.<sup>38</sup>

Bret Eknes, supervisor of the Commission's facilities permitting unit, engaged in a colloquy with Eide-Tollefson. He offered to provide contact information for a supervisor of another unit at the Commission involved in the issue she identified.<sup>39</sup> Eknes explained that alternatives are considered in solar and wind permit applications.

Eide-Tollefson expressed disappointment that Minnesota Transmission Owners asked to be exempted from public meetings required in the state transmission plan, without an alternative mechanism to provide for public engagement.<sup>40</sup> Eknes explained that the meetings were not well attended when a specific project was not at issue.<sup>41</sup> Eide-Tollefson stated that she and others attended a number of those meetings but acknowledged that "there wasn't . . . a big investment on the part of others."<sup>42</sup>

##### ii. Carol Overland

Overland offered wide-ranging and detailed oral comments at the hearing,<sup>43</sup> in addition to her written comments.<sup>44</sup> Overland noted that she is an attorney who has

---

<sup>34</sup> Hearing Tr. at 22–23.

<sup>35</sup> Hearing Tr. at 23–24.

<sup>36</sup> Hearing Tr. at 24.

<sup>37</sup> *Id.*

<sup>38</sup> *Id.*

<sup>39</sup> Hearing Tr. at 25–28.

<sup>40</sup> Hearing Tr. at 26.

<sup>41</sup> Hearing Tr. at 27.

<sup>42</sup> Hearing Tr. at 27–28.

<sup>43</sup> Hearing Tr. at 28–59.

<sup>44</sup> See Section III.B.ii., below. Overland's written comments include illustrative exhibits that she used and referred to throughout her oral comments at the public hearing.

been working on these issues and has been attending Power Plant Siting Act hearings for 25 years.<sup>45</sup>

Major themes addressed in Overland's oral comments: public participation opportunities; the Commission's role as regulator; the transmission build-out alluded to by EERA; bases for past transmission need determinations warranting skepticism of present and future proposals; economic incentives that affect utility decisions to invest in transmission infrastructure; alternatives to new transmission; and the effects of transmission investment on the mix of utility-scale versus distributed generation and on rates.

### **Public Participation Opportunities**

Overland commented that, over the last 25 years, she has observed fewer opportunities for the public to participate in power plant siting decisions.<sup>46</sup> Additionally, she noted that public interest and involvement has waned.<sup>47</sup> As part of her comments, she urged the public to be involved in the Biannual Transmission Plan comment period.<sup>48</sup>

### **The Commission's Regulatory Role**

Overland discussed her work on a workgroup in 2002 that developed siting criteria for small wind projects, and remarked that the Commission and others began using the criteria for large wind facilities.<sup>49</sup> She asserted that there should be specific wind-siting rules.<sup>50</sup> Then, in 2005 legislation required additional rulemaking, which she described as starting in 2012.<sup>51</sup> Over a period of years, a work group developed amendments to Minn. R. Chs. 7849 and 7850 which the Commission did not ultimately adopt.<sup>52</sup> Overland regarded it as a problem that a transmission build-out is underway when the rules for siting and routing have not been updated.<sup>53</sup>

Overland objected to efforts to "streamline" the facility permitting process, contending that the premise that streamlining approval presumes that projects are needed or should be approved.<sup>54</sup> She asserted that the Commission should instead consider what it needs to evaluate the need for projects rather than pursue efforts at streamlining.<sup>55</sup>

---

<sup>45</sup> Hearing Tr. at 29.

<sup>46</sup> Hearing Tr. at 29.

<sup>47</sup> Hearing Tr. at 31.

<sup>48</sup> Hearing Tr. at 59.

<sup>49</sup> Hearing Tr. at 29–30.

<sup>50</sup> Hearing Tr. at 30.

<sup>51</sup> Hearing Tr. at 30.

<sup>52</sup> Hearing Tr. at 30. Overland provides additional detail and discussion of this advisory committee and rulemaking process in her written comments. See Section B.ii., below.

<sup>53</sup> Hearing Tr. at 31.

<sup>54</sup> Hearing Tr. at 50.

<sup>55</sup> Hearing Tr. at 50–51.

## Transmission Build-Out

Overland first noted that the EERA's list of transmission permits in process in 2023 was incomplete in that transmission projects with docket numbers but on hold were apparently not included.<sup>56</sup> She also noted that the permitting process made it difficult to highlight and identify the impact of a transmission project, stating that at one certificate of need hearing she was not allowed to show a map.<sup>57</sup> Overland asserted that Xcel's practice of segmenting transmission projects makes it harder to know the full impact of what is contemplated.<sup>58</sup> She questioned how a project's impact can be evaluated without considering other projects that it is connected to.<sup>59</sup>

## Transmission Need Determinations

Overland commented that the Commission has, for transmission projects, abdicated its responsibility to require the utility to establish that a project is needed.<sup>60</sup> She stated that the Commission uses MISO approval as sufficient to establish need.<sup>61</sup> She commented that the public cannot participate in MISO transmission planning meetings purportedly because non-public critical energy infrastructure information is discussed at the meetings.<sup>62</sup>

As an illustrative dispute of a transmission project's need, Overland highlighted the Split Rock to Lakefield transmission line, Docket No. 19-58.<sup>63</sup> She stated that the project was purportedly for the transmission of wind energy, but that just 10% to 15% of the line's capacity was needed to carry the wind energy.<sup>64</sup> She also asserted that the CapX transmission projects were justified by demand growth that did not materialize.<sup>65</sup> Overland further stated that utilities' generation reserve margin has gone up despite, in part, justifying transmission infrastructure as a way to reduce the amount of reserve margin the utilities needed.<sup>66</sup>

Overland posited that a transmission line is only needed if it is needed for a utility's service territory.<sup>67</sup>

In addition to her general comments regarding the transmission project need determinations, Overland also criticized a proposed transmission line from Lyon County to Sherco, that it was "strictly for Xcel to preserve their transmission rights." And she suggested that some transmission projects are offered to address distribution

---

<sup>56</sup> Hearing Tr. at 32–33, 45.

<sup>57</sup> Hearing Tr. at 35.

<sup>58</sup> Hearing Tr. at 39.

<sup>59</sup> Hearing Tr. at 35.

<sup>60</sup> Hearing Tr. at 33.

<sup>61</sup> Hearing Tr. at 33.

<sup>62</sup> Hearing Tr. at 37.

<sup>63</sup> Hearing Tr. at 39–40.

<sup>64</sup> Hearing Tr. at 40.

<sup>65</sup> Hearing Tr. at 42.

<sup>66</sup> Hearing Tr. at 54–55.

<sup>67</sup> Hearing Tr. at 51.

challenges that should be addressed with distribution system upgrades.<sup>68</sup> She commented that utilities have not kept up with their responsibilities to upgrade the distribution system.<sup>69</sup>

### **Economic Incentives Driving Transmission Investment**

Overland asserted that utilities want to build transmission so they can sell energy on the market.<sup>70</sup> She stated that Xcel is exporting and selling into the market 1,500 megawatts, annually.<sup>71</sup> Overland also noted that utilities can earn a higher rate of return on transmission than for retailing electricity and can charge for providing transmission service.<sup>72</sup>

### **Alternatives to New Transmission Infrastructure**

Overland identified distributed generation as an alternative to new transmission infrastructure. She stated, “If we could spend the money we’re spending on transmission on distributed generation, it would be a whole other ballgame.”<sup>73</sup>

### **The Effects of Transmission Investment on Distributed Generation and on Rates**

Overland remarked that, in connection with the higher rate of return, transmission costs are causing rates to go up.<sup>74</sup> And she asserted that the investment in transmission “cuts out any possibility of serious distributed generation,”<sup>75</sup> and is “the antithesis of any effort for distributed generation.”<sup>76</sup> Overland contended that the investment in transmission “is locking us into the central station mode[.]”<sup>77</sup> In contrast, she remarked, distributed generation would obviate the need for transmission investments.<sup>78</sup>

## **B. Written Comments**

### **i. EERA**

EERA’s written comments align with its oral presentation at the hearing.<sup>79</sup> The comments summarize its role in the energy-facility-permitting process, describe legislative changes during the 2023 legislative session, and note the MISO Tranche 1

---

<sup>68</sup> Hearing Tr. at 48–49.

<sup>69</sup> Hearing Tr. at 49.

<sup>70</sup> Hearing Tr. at 43.

<sup>71</sup> Hearing Tr. at 43.

<sup>72</sup> Hearing Tr. at 46.

<sup>73</sup> Hearing Tr. at 55.

<sup>74</sup> Hearing Tr. at 46–47, 51.

<sup>75</sup> Hearing Tr. at 47.

<sup>76</sup> Hearing Tr. at 47–48.

<sup>77</sup> Hearing Tr. at 56.

<sup>78</sup> Hearing Tr. at 47.

<sup>79</sup> EERA Summary (eDockets No. [202312-201090-01](#)).

Transmission Line Portfolio and carbon dioxide pipeline projects.<sup>80</sup> EERA’s comments also state that EERA is updating its website, which it expects to launch in “early 2024.”<sup>81</sup>

Finally, EERA states that it is participating in two research projects funded by U.S. Department of Energy grants “to examine the potential ecosystem benefits of solar farms.”<sup>82</sup> One project, led by the Argonne National Laboratory will quantify soil-related ecosystem services at solar farms, such as carbon storage in soils.<sup>83</sup> Another project, led by the Great Plains institute, will develop tools and models to demonstrate the potential ecosystem benefits of solar farms.<sup>84</sup> EERA wrote that its participation will ensure the research is informed by regulatory perspective and could ultimately benefit informed regulatory decision-making.<sup>85</sup>

## ii. MnDOT

MnDOT’s written comments addressed its role in the siting and routing process, how it participates in the process, how it engages with projects after a permit is approved, its environmental stewardship, and its coordination with Minnesota Indian tribes.<sup>86</sup> MnDOT participates in the siting and routing process in accordance with Minn. Stat. § 216E.10, subd. 3 (2022).<sup>87</sup> DOT protects current and future rights-of-way and evaluates and mitigates potential siting and routing effects on land the DOT owns.<sup>88</sup> DOT attempts to accommodate utilities within rights-of-way or as near to them as possible.<sup>89</sup>

Prior to Commission permit approval, DOT participates in the permit approval process by engaging in pre-filing project review and by identifying sensitive resources and planned MnDOT projects in the area.<sup>90</sup> It also provides information to the government agencies involved and submits phase-specific, applicable comments to a proceeding’s record.<sup>91</sup>

Following Commission permit approval, DOT continues project-specific coordination and conducts project review meetings as they pertain to MnDOT interests, including safety, sensitive resources, and future construction.<sup>92</sup> It also offers guidance, review, and issues permits concerning rights-of-way, driveways and highway access points, and oversize/overweight permits.<sup>93</sup>

---

<sup>80</sup> *Id.* at 1–2.

<sup>81</sup> *Id.* at 2.

<sup>82</sup> *Id.*

<sup>83</sup> *Id.*

<sup>84</sup> *Id.*

<sup>85</sup> *Id.*

<sup>86</sup> MnDOT Comments (eDockets No. [20241-202101-01](#)).

<sup>87</sup> *Id.*

<sup>88</sup> *Id.*

<sup>89</sup> *Id.*

<sup>90</sup> *Id.*

<sup>91</sup> *Id.*

<sup>92</sup> MnDOT Comments (eDockets No. [20241-202101-01](#)).

<sup>93</sup> *Id.*



MnDOT explained that all MnDOT permits applied for, including those permitted through the Commission, are subject to additional specialized reviews for environmental stewardship and appropriate Minnesota Tribal approvals, as appropriate.<sup>94</sup> MnDOT's Office of Land Management coordinates with its Office of Environmental Stewardship to conduct early project reviews and downstream reviews to review projects as they affect roadside vegetation management, cultural resources, containment and regulated materials, and threatened and endangered species.<sup>95</sup>

MnDOT also noted that it has made improvements to its large energy facility project review and early-coordination processes.<sup>96</sup> MnDOT stated that it has updated or newly implemented its transmission line guidelines; environmental requirements; Utility Early Notification Memo (ENM) and Desktop Review Process; and Utility ENM Supplemental Information Checklist. And it wrote that its Utility Project Review Guidance for Large Energy Facilities will soon be published.

Lastly, MnDOT noted that because existing road right-of-way is a preferred routing option for Commission-permitted projects, existing utility placement within state highway right-of-way is plentiful and, in some cases, the right-of-way is full.<sup>97</sup> It suggested that project proposers consider the existing utilization of right-of-way and locate existing utilities before considering MnDOT right-of-way as part of a proposal.<sup>98</sup>

### **iii. Carol Overland**

Carol Overland provided written comments, in addition to her oral comments.<sup>99</sup> This portion of the summary addresses only her written comments.

In comments dated December 20, 2023, Overland submitted illustrative exhibits that she alluded to in her oral comments.<sup>100</sup> In addition to the illustrative exhibits, Overland supplemented her remarks about transmission projects being approved in lieu of distribution system upgrades and reiterated her comments concerning the utility benefits and ratepayer costs of excess transmission.<sup>101</sup>

On December 22, 2023, Overland submitted a letter reiterating her oral comments regarding the Commission's regulatory function particularly with respect to permitting transmission infrastructure and regarding the opportunities for public involvement in the process.<sup>102</sup> Her letter also requested data relating to the "Permitting

---

<sup>94</sup> MnDOT Comments (eDockets No. [20241-202101-01](#)), at 2.

<sup>95</sup> *Id.*

<sup>96</sup> *Id.*

<sup>97</sup> *Id.*

<sup>98</sup> *Id.*

<sup>99</sup> Overland Written Comments (eDockets Nos. [202312-201526-01](#), [202312-201516-01](#), [202312-201545-01](#), [20241-201780-01](#), [20241-201774-02](#), [20241-201774-01](#)).

<sup>100</sup> Overland Written Comment (Dec. 20, 2023), filed on Dec. 22, 2023 (eDockets No. [202312-201516-01](#)).

<sup>101</sup> *Id.* at 9.

<sup>102</sup> Overland Written Comment (Dec. 22, 2023) (eDockets No. [202312-201526-01](#)).

Efficiency Stakeholder Meeting,” about which the Commission received a report on January 3, 2024.<sup>103</sup>

On December 26, 2023, Overland submitted additional comments addressing the January 3, 2024 special planning meeting at which the Commission would receive the report.<sup>104</sup> She attached an internet post that she authored calling attention to and discussing the scheduled meeting.<sup>105</sup> Overland also attached an internet post from 2014 about the e21 Initiative.

In her December 26 letter, she reiterated her oral comments about her concerns that “streamlining’ efforts” limit the public’s opportunity to participate in energy facility planning and what she described as the Commission “abdicat[ing]” its regulatory responsibility.<sup>106</sup> In particular, she pointed to the work of an advisory committee first assembled by the Commission in 2012 to revise Minn. R. Chs. 7849 and 7850, which the Commission did not adopt.<sup>107</sup>

On January 3, 2024, Overland filed: a third written comment submission dated January 2, 2024,<sup>108</sup> and a copy of a September 17, 2021, Revisor’s draft of proposed revisions to Minn. R. Chs. 7829, 7849, and 7850, which the Commission did not adopt,<sup>109</sup> and a copy of the “Permitting Reform Stakeholder Report.”<sup>110</sup>

In her January 3 letter, Overland wrote that she was “incensed and disheartened to learn there was yet another effort afoot to gut the [Power Plant Siting Act].”<sup>111</sup> Overland commented that the permitting-reform stakeholder process was not public, there was no comment period, and the Commission’s receipt of the report was the public’s first opportunity to see the product of the stakeholder process.<sup>112</sup>

Overland observed that stakeholders that participated in the permitting-reform stakeholder process either did not comment on the process at the 2023 Power Plant Siting Act Annual Hearing or did not attend.<sup>113</sup> She asserted that the public interest was inadequately represented in the process. Overland wrote:

This “Permitting Reform” effort is nothing more than a concerted effort to:  
1) gut the environmental protections and public participation opportunities

---

<sup>103</sup> *Id.* at 2.

<sup>104</sup> Overland Written Comment (Dec. 26, 2023) (eDockets No. [202312-201545-01](#)).

<sup>105</sup> *Id.* at 3–5.

<sup>106</sup> *Id.* at 1–2.

<sup>107</sup> Minn R. 7849.0010–0400 specifies the content of applications for certificates of need and specifies criteria for the assessment of need for large electric generating facilities and large high voltage transmission lines. Minn. R. 7849.0020 (2023). Minn. R. 7850.1000–.5600 implements the Power Plant Siting Act and establishes processes for the siting and routing of power plants and high voltage transmission lines. Minn. R. 7850.1100 (2023).

<sup>108</sup> Overland Written Comment (Jan. 2, 2024) (eDockets No. [20241-201774-01](#)).

<sup>109</sup> eDockets No. [20241-201780-01](#).

<sup>110</sup> Permitting Reform Stakeholder Report (eDockets No. [20241-201774-02](#)).

<sup>111</sup> *Id.*

<sup>112</sup> Overland Written Comment (Jan. 2, 2024) at 1.

<sup>113</sup> *Id.* at 2.


provided by the Power Plant Siting Act; and 2) to further skew the Commission’s review of “need” that’s being subverted through conflation of a Commission “need” review and determination with “MISO approval.”<sup>114</sup>

She again pointed to the work done on proposed (unadopted) amendments to Minn. R. Ch. 7849 and 7850. She contrasted the rulemaking process with the process of the stakeholder group, which she described as “circumventing” established process.<sup>115</sup>

Overland commented that the recommendations offered in the Permitting Reform Stakeholder Report “gut” environmental review and protections.<sup>116</sup> She noted that the Environmental Quality Board (EQB) and Minnesota Pollution Control Agency (MPCA) did not participate in the process. She then cited *People for Environmental Enlightenment and Responsibility, Inc. v. Minn. Environmental Quality Council*, 266 N.W.2d 858 (Minn. 1978), for the proposition that the Power Plant Siting Act is an environmental law.<sup>117</sup> And she asserted that the stakeholder process failed to address the concerns of the Office of Legislative Auditor’s recommendation for the Commission to “adopt broad spectrum citizen participation as a principal of operation.”<sup>118</sup>

Finally, Overland provided responses to each of the 35 recommendations offered in the Permitting Reform Stakeholder Report, objecting to many.<sup>119</sup> She commented that moving EERA staff and responsibilities to the PUC would go “from bad to worse” with respect to the implementation of the Power Plant Siting Act as environmental law.<sup>120</sup> She asserted that many recommendations would limit or eliminate opportunities for public participation.<sup>121</sup> She regarded other recommendations as limiting or eliminating environmental review.<sup>122</sup> And she urged the Commission to consider how many of the 35 recommendations were addressed in the unadopted proposed amendments to Minn. R. Ch. 7849 and 7850.

Dated: February 28, 2024



CHRISTA L. MOSENG  
Administrative Law Judge

---

<sup>114</sup> Overland Written Comment (Jan. 2, 2024) at 2–3.

<sup>115</sup> Overland Written Comment (Jan. 2, 2024) at 3.

<sup>116</sup> *Id.*

<sup>117</sup> *Id.* at 3–4.

<sup>118</sup> *Id.* at 4.

<sup>119</sup> Overland Written Comment (Jan. 2, 2024) at 4–10.

<sup>120</sup> Overland Written Comment (Jan. 2, 2024) at 5.

<sup>121</sup> Overland Written Comment (Jan. 2, 2024) at 5, 6.

<sup>122</sup> Overland Written Comment (Jan. 2, 2024) at 5, 6.

February 28, 2024

See Attached Service List

**Re: *In the Matter of the 2023 Annual Power Plant Siting Act Hearing***

**OAH 22-2500-39615  
MPUC E-999/PR-23-18**

To All Persons on the Attached Service List:

Enclosed and served upon you is the Administrative Law Judge's **REPORT TO THE COMMISSION** in the above-entitled matter.

If you have any questions, please contact me at (651) 361-7874, [michelle.severson@state.mn.us](mailto:michelle.severson@state.mn.us), or via facsimile at (651) 539-0310.

Sincerely,



MICHELLE SEVERSON  
Legal Assistant

Enclosure

cc: Docket Coordinator

STATE OF MINNESOTA  
OFFICE OF ADMINISTRATIVE HEARINGS  
PO BOX 64620  
600 NORTH ROBERT STREET  
ST. PAUL, MINNESOTA 55164

**CERTIFICATE OF SERVICE**

In the Matter of the 2023 Annual Power Plant Siting Act Hearing	OAH Docket No.: 22-2500-39615
---	----------------------------------

On February 28, 2024, a true and correct copy of the **REPORT TO THE COMMISSION** was served by eService, and United States mail, (in the manner indicated below) to the following individuals:

First Name	Last Name	Email	Company Name
John	Doll	2johndoll@gmail.com	
Allie	Olson	aa_olson@hotmail.com	
Abbie	Plouff	abbie.plouff@gmail.com	
Abby K.	Leach	abby@leachlawalbertlea.com	
Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy
Angel	Dobrow	adobrow@hotmail.com	
Anna	Friedlander	afriedlander@odonoghuelaw.com	O'Donoghue & O'Donoghue LLP
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law
Akilah	Sanders Reed	akilah.project350@gmail.com	
Andy	Kim	akim@evs-eng.com	EVS, Inc.
Adam	Lanz	alanz@treknorth.org	TrekNorth Jr. & Sr. High School
Diane	Noll	albanytwp@albanytel.com	
Alicia	Dvorak	aliciadvorak@gmail.com	
Jamie	Fitzke	ALTE0031@umn.edu	
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP
Andrew	Wyffels	andrew.wyffels@gmail.com	
Angela	Piner	angela.piner@hdrinc.com	HDR, Inc.
Angie	Berg	angie.berg@co.stearns.mn.us	Stearns County

Ann	O'Reilly	ann.oreilly@state.mn.us	Office of Administrative Hearings
Anna	Richey	anna@conservationminnesota.org	Conservation MN
Annabel	Sammons	Annabel.Sammons@westwoodps.com	Westwood
Anne	Marcotte	anne.marcotte2@gmail.com	Aitkin County Board
Anne Marie	Griger	anne-marie.griger@res-group.com	Flying Cow Wind, LLC
Annie	Felix Gerth	annie.felix-gerth@state.mn.us	
Anthony	Hicks	anthony.hicks@gpreinc.com	
Adrian	Larson	aplars@gmail.com	
Ariel	Kirk	ariellkirk@yahoo.com	
Andrew	Roscoe	aroscoe@mid-america.com	
Arshia	Javaherian	arshia.javaherian@enbridge.com	Enbridge Energy
Ashley	Martin	ashley.martinstevens@gmail.com	
Audrey	Tsinnie	audreysinnie1@outlook.com	
Barbara	Becker	barb.becker@co.todd.mn.us	Todd County
Barb	Rian	barb14@live.com	
Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings
Bob	Dombeck	bcd93@comcast.net	
Bill	Cook	bcook@rpu.org	Rochester Public Utilities
Becky	Horton	Becky.Horton@state.mn.us	Department of Natural Resources
Brian	Bell	bell.brian@dorsey.com	Dorsey & Whitney LLP
Beth	Bily	beth@businessnorth.com	
Betsy	Engelking	betsy@nationalgridrenewables.com	National Grid Renewables
Breann	Jurek	bjurek@fredlaw.com	Fredrickson & Byron PA
Barbara	Kaufman	bkaufman@tds.net	
Brian	Raines	braines@ncsrcc.org	North Central States Regional Council of Carpenters
Bruce	King	Brenda@ranww.org	Realtors, Association of Northwestern WI
Brendan	Cummins	brendan@cummins-law.com	Cummins & Cummins, LLP
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy
Brian	Fredrickson	brian.fredrickson@essentiahealth.org	
Brian J	Murphy	brian.j.murphy@nexteraenergy.com	Nextera Energy Resources, LLC
Brian	Hansen	brian@apexgetsbusiness.com	
Brian	Rice	brianrice@centurytel.net	Century
B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP
Bruse	Ryan	bruce@ryan-ws.com	

Bryce	Staudinger	Bryceandamy@hotmail.com	
Bill	Meyer	bsmeyer99@msn.com	
Brad	Malm	btmalm@yahoo.com	
Gary	Buchanan	buchananfamilyfarms@yahoo.com	
Bud	Stone	bud@grandmn.com	Grand Rapids Area Chamber of Commerce
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP
Caren	Warner	caren.warner@state.mn.us	Department of Commerce
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources
Cheryl	Brandt	c-brandt@live.com	Oakland Township
Carol	Brouellette	cbrouell@hotmail.com	
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron
John	Centoben	centoben@yahoo.com	
Chuck	Diessner	cfdiessner@gmail.com	
Craig	Gordon	cgordon@invenergyllc.com	Invenergy LLC
Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers
Craig	Halla	challa@molpus.com	
Charles	Lippert	charlie.lippert@millelacsband.com	Mille Lacs Band of Ojibwe
Charles	Carlson	charlie@shamineau.org	
Chad	Henjum	chenjum@tds.net	
Charles	Passe	chpasse@gmail.com	
Christa	Moseng	christa.moseng@state.mn.us	Office of Administrative Hearings
Charles	Swanson	chuck49@wikel.com	
Charles	Johnson	chucknmelody@live.com	
Cheryl	Lawrence	cjmlawrence@hotmail.com	
Carl	Strohm	cjsmg@sbcglobal.net	SBC Global
Claire	Steens	claire.steen@charter.net	
Clark	Ericksen	clark.ericksen@yahoo.com	
Chris	Mills	cmills@sac.k12.mn.us	
Charles	Nauen	cnnauen@locklaw.com	Lockridge Grindal Nauen
Cody	Pogalz	codypogalz@dmceda.org	Destination Medical Center
Erica	Cohrs	cohrs25@gmail.com	
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC
Cory	Dutcher	cory.dutcher@ge.com	GE Power and Water
Craig and Nola	Brandt	craig.nola.brandt@gmail.com	
Carl	Gibson	crgibson1945@yahoo.com	
Craig	Schweer	cschweer71@gmail.com	
Connie	Chastain	csmamdich@gmail.com	

Cindy	Tassi	ctassi@summitcarbon.com	Summit Carbon Solutions
Chris	Ventura	cventura@consumerenergyalliance.org	Consumer Energy Alliance
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources
Dustin	Richmond	d3krich@westtechwb.com	
David	Craigmile	dacmile@farmerstel.net	
Dana	Nelson	dakotaflats@gmail.com	
Dan and Danielle	Sheild	danisheild@gmail.com	
Dave	Starr	Dave_Starr@CINFIN.com	
David	Bell	david.bell@state.mn.us	Department of Health
David	Birkholz	david.birkholz@state.mn.us	MN Department of Commerce
David J	Evans	david.evans@state.mn.us	MN Dept of Transportation
David	Kurt	David.Kurt@bp.com	BP Midwest Products Pipeline Holdings LLC
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency
Dave	Butcher	davidb@uslink.net	
Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service
Dan	Belshan	dbelshan@lakes.com	
Deana	Malone	deana.malone@co.wadena.mn.us	Wadena County Planning & Zoning
Deborah	Garross	deb.garross@burnsvillemn.gov	City of Burnsville
Debra	Feders	debfeders@yahoo.com	
Dee	Wayer	deekw@netzero.net	
Deputy Cassie	Deets 1013	deets.cassandra@CO.OLMSTED.MN.US	Emergency Management
Dennis	Dore	dennisadore@aol.com	
David	Grover	dgrover@itctransco.com	ITC Midwest
Dave	Hancock	dhancock6@msn.com	
Dorene	Hansen	dhansen078@gmail.com	
Douglas	Althoff	djalthoff@hotmail.com	
Doug	Peterson	djlpete@yahoo.com	
David	Zoll	djzoll@locklaw.com	Lockridge Grindal Nauen PLLP
Dan	Litchfield	DLitchfield@invenergyllc.com	Invenergy LLC
David	Moeller	dmoeller@allete.com	Minnesota Power
Daniel	Carlson	dncarlson8@aol.com	
Don	Czech	donczech@hotmail.com	
Donna	Andersen	donnajandersen@gmail.com	
Doug	Hayes	doug.hayes@sierraclub.org	Sierra Club



Dawn	Broitzman	drbroitzman@yahoo.com	
Drew	Campbell	drcsoup@aol.com	
Drew	Hines	drewhines@rocketmail.com	
Dan	Sigfrid	dsigfrid@msn.com	
Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment
Donovan	Dyrdal	dyr-valley@hughes.net	
Elizabeth	Wefel	eawefel@flaherty-hood.com	Flaherty & Hood, P.A.
Ellen	Boardman	eboardman@odonoghuelaw.com	O'Donoghue & O'Donoghue LLP
Eileen	Shore	eileenshore@outlook.com	Friends of the Headwaters
Ellen	Heine	ellen.l.heine@xcelenergy.com	Xcel Energy
Erin	Hornberger	elorenzen24@hotmail.com	
Erik	Nelson	enels86@yahoo.com	
Erin	Radloff	erin.radloff@cenovus.com	Cenovus Energy, Inc.
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine
Jayne	Trusty	execdir@swrdc.org	SWRDC
Adam	Eisenstein	eyesandstein@gmail.com	
Barbara	Mason	forbarb@gmail.com	
Francis	Passe	francispasse@gmail.com	
Frank	Bibeau	frankbibeau@gmail.com	White Earth Band of Ojibwe
Amber	Hunt	gaiasophia101@gmail.com	
Garrick	Valverde	garrick.valverde@apexcleanenergy.com	Apex Clean Energy
Edward	Garvey	garveyed@aol.com	Residence
Gary	Grimms	gary@innovativefs.com	
Greg	Chester	gchester42@gmail.com	
Geoff	Glasrud	Geoff.glasrud@fhr.com	Flint Hills Resources
George	Leary	george.leary@blueearthcountymn.gov	Blue Earth County Planning & Zoning
Gerald	Dee	gerald.dee@agstar.com	
Gary	Richter	ggrichter55@gmail.com	
Glenn	Manni	gman1249@yahoo.com	
Gordon E.	Hannon	gord.hannon@gov.mb.ca	Civil Legal Services
Gene	Davis	gpauldavis@gmail.com	
Gene	Peters	gpete1951@aol.com	
Gary	Vasdev	gv16106@gmail.com	
Greg	Wheeler	gwheeler@prosource-tech.com	Prosource Technology
George	Crocker	gwillc@nawo.org	North American Water Office
Jerry and Carolyn	Pittelko	gwp_mn@yahoo.com	
Hans	Jung	hans.jung@frontier.com	

Dorothy	Mandler	harmand99@gmail.com	
Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community
Bridget	Helwig	helwig.b@gmail.com	
Gary	Hill	hillx001@umn.edu	
Harley	Weimer	hlweimer1@gmail.com	
Holli	VanOverbeke	holli.vanoverbeke@fhr.com	Flint Hills Resources
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.
Heidi	Whidden	hwhidden@calpine.com	Calpine Corporation
Ian	Jorgensen	ijorgensen@centuryfence.com	Century Fence
Jacob	Horbacz	Jacob.Horbacz@millelacsband.com	
Jacqueline	Rodkewich	jacquehomeemail@gmail.com	
Janice A.	Helgeson	jahmh@smig.net	
Jake	Reint	Jake.reint@kochps.com	Flint Hills Resources
Jake	Sperber	jake.sperber@nuveen.com	Nuveen Asset Management
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP
James	Kelly	james.kelly@state.mn.us	Department of Health
James	LaFave	james.lafave@state.mn.us	Office of Administrative Hearings
James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.
James	Watts	james.watts@enbridge.com	Enbridge Pipelines (North Dakota) LLC
Jamie	Haas	jamie.haas@gpng.com	Great Plains Natural Gas Company
Jamie	Swezey	jamie.swezey@gmail.com	
Janet	Hill	janethillnew@gmail.com	
Jane	Ekholm	janevanhunnik@hotmail.com	
Jan	Mosman	janicemosman@gmail.com	
Jerry	Schmidt	jas@prtcl.com	
Jay	Regnier	jay.regnier@prcwind.com	PRC Wind
Jay	Anderson	jaya@cmpas.org	CMPAS
Jim	Atkinson	jbatkinson@allete.com	Minnesota Power
Joe	Bell	jbelle@brainerd.net	
James	Brandt	jbrandt@uslink.net	
Jon	Brekke	jbrekke@greenergy.com	Great River Energy
June	Wynne	jbug52@gmail.com	
John	Hottinger	jchnorthstar@gmail.com	Hottinger Consulting LLC
Jon	Coil	jcoil@paulbunyan.net	
John	Chute	jdchutemn@gmail.com	
John	Drawz	jdrawz@fredlaw.com	Fredrikson & Byron, P.A.
Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.

Jeanne	Newstrom	jealeone@yahoo.com	
Jeff	Graves	jeff031955@gmail.com	
Jeff	Jelinski	jeffreyj@co.morrison.mn.us	Morrison County
Jim and Judy	Ellingson	jelling13@gomoorhead.com	
Jennifer	Smith	jenjens1121@yahoo.com	
Jesse	Volk	jesse.volk@gpng.com	Great Plains Natural Gas Company
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings
Jean	Ross	jfross@umn.edu	
John R.	Gasele	ygasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA
Janelle	Hapka	jhapka@nd.gov	
James B.	Canaan	jim.canaan@itctel.com	Interstate Telecommunications Cooperative, Inc.
James	Talcott	jim.talcott@nngco.com	Northern Natural Gas Company
James	Marshall	jim_marshall90@hotmail.com	
Jim	Bulera	jimbulera1@msn.com	
James L	Johnson	jimjohnson767@gmail.com	
Janet	Stejskal	jmstej@paulbunyan.net	
Joe	Sedarski	joe.sedarski@westwoodps.com	Westwood
Joel	Lewis	joeldlewis@msn.com	
Joseph	Plumer	joep@whiteearth.com	Red Lake Band of Chippewa Indians
John	Peterson	john.peterson@nwsnmn.com	Northwestern Surveying
Daryl	Aubid	johnaubid@gmail.com	
John	Crane	johncranefishing@gmail.com	Fishing
John	Tormanen	johnormanen@catholicehealth.net	
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety
Joe	Husbands	josephhusbands@hotmail.com	
Joy	Bruns	joybruns@aim.com	
Jeffrey R	Jones	jrjones@cityofpipestone.com	Pipestone County
John and Jessica	Lutzi	jrlutzi80@gmail.com	
John	Satterfield	jsatterfield@summitcarbon.com	Summit Carbon Solutions, LLC
Jamie	Edwards	jsedwards2007@gmail.com	
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered
Judy	Carpenter	judymcarpenter@gmail.com	
John	Robinson	jurob03@gmail.com	
Jess	Vilsack	jvilsack@summitcarbon.com	Summit Carbon Solutions, LLC

Gerald	Von Korff	jvonkorff@rinkenoonan.com	Rinke Noonan
James W.	Reents	jwreents@gmail.com	
David	Lieser	kada@charter.net	
Karen	Sullivan Hook	karenatwork@juno.com	
Kari	Howe	kari.howe@state.mn.us	DEED
Eric	Funk	karissafunk@hotmail.com	
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources
David	Kell	kdavid6816@gmail.com	
Keith	Lightfoot	Keith.Lightfoot@fhr.com	Flint Hills Resources
Kevin	Trushenski	kevin.trushenski@burnsvillemn.gov	City of Burnsville
Kate	Howling	khowling@glidepath.net	Winnebago Solar and Storage LLC
Kimberly	Bragg	kimberly.bragg@bp.com	BP Midwest Products Pipeline Holdings LLC
Kimberly	Middendorf	kimberly.middendorf@state.mn.us	Office of Administrative Hearings
JoAnn	Downing	kjdowning@mvtvwireless.com	
Kim	Norton	Knorton@rochestermn.gov	Rochester Office of The Mayor
Dennis	Koulgraf	kohlgraf@frontiernet.net	
Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND
Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.
Laura	Green	Laura.Green@parsons.com	Parsons
Brent	Beck	luminamin@yahoo.com	Ivanhoe Times
Marie	McNamara	maclane@sleepyeyetel.net	Goodhue Wind Truth
Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy
Matthew	Langan	matthew.a.langan@xcelenergy.com	Northern States Power Co.
Matthew	Lemke	Matthew.lemke@kochps.com	Flint Hills Resources
Beverly	Meadows	meadowsb@paulbunyan.net	
Jeremy and Melissa	Moulton	memoulton@hotmail.com	
Micah	Revell	micah.revell@stinson.com	Stinson LLP
Michael	Bull	mikebull45@gmail.com	ALLETE/MN Power
Bryan	Schneider	mktobeta@yahoo.com	
David	Monkman	monkmandm@yahoo.com	
Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy
John	Munter	mumooatthefarm@yahoo.com	
Deanna	Johnson	nanakay@unitelc.com	
Nicholas	Korn	NJKORN@GMAIL.COM	
David	Butler	odbutler78@yahoo.com	

Bryan	Bode	office@dirtmerchantinc.com	
Brian	Olson	olson2439@gmail.com	
Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office
John	Robinson	pascoe@paulbunyan.net	
Deborah	Roettger	pocketsdr@yahoo.com	
Peter	Rood	prood@glidepath.net	Winnebago Solar and Storage LLC
Cassandra	Remington	purplesandy07@gmail.com	
Randall	Doneen	randall.doneen@state.mn.us	Department of Natural Resources
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD
Rhonda	LaVelle	rlavelle@kaaltv.com	KAAL-TV
Bruce	Robinson	robibru@frontiernet.net	
Ry	Marcattilio McCracken	ry@ilsr.org	Institute for Local Self-Reliance
Alan	Whipple	sa.property@state.mn.us	Minnesota Department Of Revenue
Dean and Sherry	Adams	sadams448@gmail.com	
Sarah	Beimers	sarah.beimers@state.mn.us	Department of Administration - State Historic Preservation Office
Bob	Scribner	sawmill44@wcta.net	
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce
Judy	Coughlin	shortstop@frontiernet.net	
District	Director	skip.langer@mn.nacdnet.net	Olmsted Soil and Water Conservation District
Erwin	Rud	slowdancer@gvtel.com	
Fred	Smith	SMITH009@umn.edu	
Cavour	Johnson	snowta@uslink.net	
Gary and Marcia	Sola	Solagm1974@gmail.com	
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture
Stephen	Rakow	stephen.rakow@state.mn.us	Department of Commerce

Andrew	Pearson	stopthewar24@gmail.com	
Sue	Anderson	sue.anderson@kochind.com	Flint Hills Resources Pine Bend, LLC
Dean and Jill	Johnson	theoaks@brainerd.net	
Todd	Green	Todd.A.Green@state.mn.us	Minnesota Department of Labor & Industry
Dennis	Gustafson	tomtegarden@citlink.net	
David	Siljenberg	traum@kmtel.com	
Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency
Anita	Reyes	wagonburner1020@aol.com	
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission
Zachary	Ruzycki	zruzycki@greenergy.com	Great River Energy