

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of Northern States Power Co. d/b/a
as Xcel Energy Petition for Approval of
Generator Projects for MISO ERAS

SERVICE DATE: April 3, 2026
DOCKET NO. E-002/RP-24-67

The above-entitled matter was considered by the Commission on March 26, 2026, and the following disposition made:

- 1. Approved the following Power Purchase Agreements (PPA):**
 - a. Cannon Falls Expansion Amendment, as modified in Xcel's March 17, 2026 filing.**
 - b. Sandhill BESS**
 - c. Benton II BESS**
- 2. Authorized Xcel Energy to recover, through the Fuel Clause Rider, the Minnesota jurisdictional portion of the energy costs incurred under the PPAs from Minnesota retail customers. Additionally, authorized recovery of capacity payments through base rates and the capacity tracker.**
- 3. With a triggering of a New Trade Measure Event, required Xcel Energy to include in its fuel clause filing a showing that it is just and reasonable for ratepayers, rather than Xcel Energy's shareholders, to bear the increased costs.**
- 4. Required Xcel Energy to apply an estimated cost for imputed debt to PPA projects in future resource acquisition filings.**

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order.¹ This Order shall become effective immediately.

¹ In addition to adopting the Department's reasonable recommendations, the Commission will add the requirement specified in ordering paragraph number three. The Commission finds that this requirement is reasonable, and all parties concurred.



BY ORDER OF THE COMMISSION

Michael Balsara

Sasha Bergman
Executive Secretary

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January 5, 2026

PUBLIC DOCUMENT

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **PUBLIC** Comments of the Minnesota Department of Commerce
Docket No. E002/RP-24-67

Dear Ms. Bergman,

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce (Department) in the following matter:

*In the Matter of Northern States Power Company d/b/a Xcel Energy's
Petition for Approval of Generator Projects for MISO's Expedited Resource
Addition Study.*

The Petition was filed by Northern States Power Company, doing business as Xcel Energy on December 3, 2025.

The Department recommends **approval** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

SR/ar
Attachment

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Acronyms and Abbreviations

BESS	Battery Energy Storage System
CAF	Capacity Availability Factor
CFEC	Cannon Falls Energy Center
CFS	Carbon-free Standard
COD	Commercial Operation Date
CONE	Cost of New Entry
Commission	Minnesota Public Utilities Commission
CPD	Critical Path Development
CT	Combustion Turbine
EFA	Extraordinary Federal Action
ERAS	Expedited Resource Addition Study
FCR	Fuel Clause Rider
GIA	Generator Interconnection Agreement
IRP	Integrated Resource Plan
ITC	Investment Tax Credit
kW	kilowatt
MEC	Mankato Energy Center Combined Cycle
MISO	Midcontinent Independent System Operator, Inc.
MNEC	Minnesota Energy Connection
MW	Megawatt
MWh	Megawatt-hour
POD	Point of Delivery
PPA	Power Purchase Agreement
PRM	Planning Reserve Margin
PTC	Production Tax Credit
PVRR	Present Value of Revenue Requirements
PVSC	Present Value of Societal Costs
RTE	Round-trip Efficiency
SCTL	Specified Change in Tax Law
Sherco	Sherburne County Generating Station
SOFR	Secured Overnight Financing Rate
Xcel or Company	Northern States Power Company, doing business as Xcel Energy

Definitions

800 MW Petition	The Company's September 26, 2025 Petition in Docket Nos. E002/CN-23-212 and E002/RP-24-67.
800 MW Supplement	The Company's December 5, 2025 Supplemental Filing in Docket Nos. E002/CN-23-212 and E002/RP-24-67.
2024 IRP Order	The Commission's April 21, 2025 <i>Order Approving Settlement Agreement with Modifications</i> ; see Docket No. E002/RP-24-67.
2024 RFP Petition	The Company's October 31, 2025 Petition in Docket No. E002/M-24-230.
End Effects Period	A period of varying length after the planning period in a resource plan modeling run.
Notice	The Commission's December 5, 2025 Notice of Comment Period in Docket No. E002/RP-24-67.
Petition	The Company's December 3, 2025 Petition in Docket No. E002/RP-24-67.
Planning Period	The first fifteen years of a resource plan modeling run.
Study Period	The planning period plus the end effects period in a resource plan modeling run.
Wind Development Transfer	The Company's Process for acquiring projects to use the MNEC, see Docket No. E002/M-23-342. The Petition has not been filed at this time.

Before the Minnesota Public Utilities Commission
PUBLIC Comments of the Minnesota Department of Commerce

Docket No. E002/RP-24-67

I. INTRODUCTION

Xcel submitted a petition for approval of three projects for which third-party developers have submitted an ERAS application to the Midcontinent Independent System Operator, Inc. (MISO). The projects are:

- 200 MW Sandhill BESS;
- 300 MW Benton II BESS; and
- 45-70 MW of incremental capacity that would result from planned upgrades at the CFEC (collectively, ERAS Portfolio 1).^{1, 2}

The CFEC expansion is in MISO’s ERAS Study Cycle 2.³ A brief description of the projects in the Petition is shown in Table 1.

Table 1: Overview of Xcel’s Proposed ERAS Portfolio 1

Project Name	Location	Seller	Type	Installed Capacity	COD	Capacity Payment \$/kW-month
CFEC Expansion	Goodhue County	Invenergy Renewables, LLC	Combustion Turbine	45-70 MW	6/1/2028	[TRADE SECRET DATA HAS BEEN EXCISED]
Sandhill	Olmsted County	Tenaska	BESS	200 MW	12/31/2028	
Benton II	Benton County	NextEra	BESS	300 MW	5/31/2029	

¹ In the Matter of Northern States Power Company d/b/a Xcel Energy’s Petition for Approval of Generator Projects for MISO’s Expedited Resource Addition Study (ERAS), Xcel Energy, Petition, December 3, 2025, Docket No. E002/RP-24-67, (eDockets) [202512-225511-02](#), (hereinafter “Petition”).

² Note that Benton II originally included 100 MW of solar but Xcel elected to proceed only with the Benton II BESS as the solar component was determined to be cost-prohibitive; Petition at 12.

³ See [MISO ERAS Interconnection Requests](#). The webpage was downloaded on December 24, 2025

A summary of Xcel’s recent filings showing total installed capacity by resource type is shown in Table 2.

Table 2: Summary of Recent Resource Acquisitions (MW)

Docket No.	Proceeding	Combined Cycle	Combustion Turbine	BESS	Solar
CN-23-212 ⁴	800 MW Petition	375	777	412	-
CN-23-212 ⁵	800 MW Supplement	-	-	80	-
M-24-230 ⁶	2024 RFP Petition	-	-	856	768
RP-24-67 ⁷	ERAS Portfolio 1	-	45	500	-
Sum		375	822	1,848	768

The additions in Table 2 include the projects in this proceeding and other proceedings that are currently on-going. In addition to the on-going acquisitions shown in Table 2 at an earlier date Xcel requested Commission verification for the MISO ERAS process for an additional 950 MW of BESS.⁸ Also, Xcel is also in the process of acquiring 1,500 MW of wind and expects to file for approval in the first quarter of 2026.⁹

Xcel requests that the Commission take the following actions:

- Find that the Company’s proposed ERAS Portfolio 1 is in the public interest;
- Approve the three PPAs;
- Authorize the Company to recover, through the Fuel Clause Rider (FCR), pursuant to Minn. Stat. § 216B.16 subd. 7(3), the Minnesota jurisdictional portion of the costs incurred under the PPAs from Minnesota retail customers; and
- Establish a procedural schedule such that the Commission may complete deliberations by mid-February 2026, ahead of a substantial non-refundable payment required upon execution of the GIA.¹⁰

⁴ For the PPA projects see: *In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Xcel Energy, Petition, September 26, 2025, Docket No. E002/M-23-212, (eDockets) [20259-223366-02](#) at 4-5. For Xcel’s self-build projects see: *In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation, Order Approving Settlement Agreement With Modifications*, April 21, 2025, Docket Nos. E002/RP-24-67 and E002/CN-23-212, (eDockets) [20254-217941-01](#) at 6-7.

⁵ *In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Xcel Energy, Supplement, December 5, 2025, Docket No. E002/CN-23-212 and E002/RP-24-67, (eDockets) [202512-225594-02](#), at 2.

⁶ *In the Matter of Xcel Energy’s 2024 Wind, Solar, and Storage Request for Proposals*, Xcel Energy, Petition, October 31, 2025, Docket No. E002/M-24-230, (eDockets) [202510-224560-01](#), [202510-224560-03](#), [202510-224560-04](#), [202510-224560-05](#), [202510-224560-06](#), [202510-224560-07](#), [202510-224560-08](#), at 3.

⁷ Petition at 3. Note that for the combustion turbine Xcel provides a range of 45-70 MW.

⁸ *In the Matter of Xcel’s Proposed Generator Projects For Expedited Resource Addition Study*, Xcel, Petition Supplement, August 1, 2025, Docket No. E002/RP-24-67 (eDockets) [20258-221673-01](#).

⁹ *In the Matter of Xcel Energy’s Petition for Approval of a Development Transfer Resource Acquisition Process*, Xcel Energy, Update, July 15, 2025, Docket No. E002/M-23-342, (eDockets) [20257-220987-01](#). Note that a subsequent (October 15) update omitted the capacity estimate.

¹⁰ Petition at 1-2.

II. PROCEDURAL BACKGROUND

December 3, 2025 Xcel filed a petition for approval of three PPAs for projects currently in MISO's ERAS process.

December 5, 2025 The Commission issued a notice of comment period for the petition.¹¹

According to the Commission's Notice the following topics are open for comment:

- Should the Commission approve the PPAs?
- Should the Commission authorize the Company to recover, through the FCR, pursuant to Minn. Stat. § 216B.16 subd. 7(3), the Minnesota jurisdictional portion of the costs incurred under the PPAs from Minnesota retail customers?
- Are there any other topics related to this matter?

III. DEPARTMENT ANALYSIS

A. COMPLETENESS

The Commission's Rules define the Petition as a "miscellaneous filing" under Minn. R. 7829.0100, subp. 11 since no determination of Xcel's overall revenue requirement is necessary.¹² Minn. R. 7829.1300 subp. 3 contains the completeness requirements for miscellaneous filings.¹³

The Department reviewed the Petition for compliance with completeness requirements. The Department concludes that the Petition is complete.

B. GOVERNING STATUTES AND RULES

The Petition was filed pursuant to Minn. Stat. § 216B.16 subd. 7 which authorizes recovery of the Minnesota jurisdictional share of PPA costs.¹⁴ Specifically, Minn. Stat. § 216B.16 subd. 7 states:

Notwithstanding any other provision of this chapter, the [C]ommission may permit a public utility to file rate schedules containing provisions for the automatic adjustment of charges for public utility service in direct relation to changes in:

...

(3) costs for fuel used in generation of electricity or the manufacture of gas.

¹¹ *In the Matter of Northern States Power Company d/b/a Xcel Energy's Petition for Approval of Generator Projects for MISO's Expedited Resource Addition Study (ERAS), Notice of Comment Period*, December 5, 2025, Docket No. E002/RP-24-67, (eDockets) [202512-225567-01](#), (hereinafter "Notice").

¹² [Minn. R. 7829.0100, subp. 11.](#)

¹³ [Minn. R. 7829.1300, subp. 3.](#)

¹⁴ [Minn. Stat. § 216B.16, subd. 7](#) (2025).

C. *NEED ANALYSIS*

C.1. *Background*

The Commission's order in Xcel's most recent IRP set peaking capacity acquisition targets as follows:

- 600 MW of standalone BESS to be installed by a target date of end-of-year 2030;
 - to the extent feasible, 120 MW must use the MNEC; and
- aside from the resources selected in the firm dispatchable docket (Docket No. E002/CN-23-212), the five-year action plan does not include any size/type/timing decisions for new generic resources that could include combustion turbine gas plants, nor does it include any additional new gas generation with unconstrained carbon emissions.¹⁵

The 600 MW of standalone BESS target was addressed by Xcel's petition in Docket No. E002/M-24-230 which proposed the acquisition of 856 MW/3,422 MWh of BESS capacity.¹⁶

The IRP process seeks to select a plan that balances the needs for maintaining reliability, minimizing rates, reducing adverse environmental and socioeconomic burdens, enhancing the utility's ability to respond to changes, and limiting the impact of risks by analyzing various options under a variety of assumptions and considering stakeholder input.¹⁷ The projects in question here were not selected in the IRP process. However, the resource size, type, and timing targets for Xcel's additions were determined in the IRP.

Overall, a well-developed IRP provides the analytical basis for determinations in subsequent proceedings. When a utility's proposed resource acquisition is consistent with the IRP analysis and Commission decision, no further resource-planning type analysis is needed.¹⁸ When facts regarding the specific resources proposed by the utility fall outside of the analysis and Commission decision in the most recent IRP, further resource-planning type analysis using the updated facts is warranted. In essence, resource acquisition typically conforms with the Commission's most recent IRP order unless facts in the resource acquisition proceeding dictate that the action plan should change.¹⁹ This approach is consistent with the Commission's order in a past resource acquisition proceeding:

[...] while a resource plan is intended to plot a utility's course for the next 15 years, it is based on facts known as of a specific point in time. As more

¹⁵ *In the Matter of Xcel Energy's 2024–2040 Upper Midwest Integrated Resource Plan*, Order Approving Settlement Agreement with Modifications, April 21, 2025, Docket Nos. E002/RP-24-67 and E002/CN-23-212 (eDockets) [20254-217941-01](#) at Order Points 2, 3, 4, and 7.

¹⁶ 2024 RFP Petition at 1.

¹⁷ [Minn. R. 7843.0500](#).

¹⁸ Examples include Docket Nos. IP6838/CN-10-80 and E002/M-11-713 (Prairie Rose Wind); Docket No. E015/M-13-907 (Bison 4); and Docket Nos. E017/M-09-883 and E017/M-09-1484.

¹⁹ An example is Xcel's acquisition of 750 MW of wind generation in Dockets E002/M-13-603 and E002/M-13-716. In that case Xcel's 2010 IRP called for the addition of 200 MW of wind. However, Xcel subsequently found the cost of wind generation was below the cost evaluated in the IRP. Additional analysis with updated costs was performed by Xcel and the DOC found that, using updated pricing additional wind was cost effective.

facts become known, circumstances change and utilities must adapt – even in the absence of a new resource plan order.²⁰

Given the significant change in numerous inputs such as the demand and energy forecast and new unit pricing adaptation is clearly warranted. In this case Xcel performed a mini-IRP as described below.

C.2. Xcel's EnCompass Update

C.2.1. Model Updates and Process

Xcel started the Company's EnCompass analysis by building an updated base case. The updated base case starts with the EnCompass modeling submitted in the 2024 RFP Petition with changes to modeling inputs and assumptions. Documentation of the updated demand and energy forecasts and generic resource costs was included as Attachment O to the 2024 RFP Petition.

The Petition specifies the following additional changes in EnCompass to develop an updated Base Case. These changes apply to the EnCompass run that creates the expansion plan and not necessarily the subsequent production cost runs that are reported in the Petition.

- Resource Updates:
 - EnCompass includes the projects in the 800 MW Petition—Lyon County CT, CFEC PPA extension, MEC 1 PPA extension with BESS, North Star BESS, and Sherco West BESS;
 - EnCompass includes the projects in the 2024 RFP Petition—Sherco Solar 4, Fillmore Solar, Gopher Solar, Grant Solar, Lemon Hill Solar, Blue Lake BESS, Sherco South BESS, Crane BESS, Crowned Ridge BESS, and Mayhew Lake BESS;
 - EnCompass includes the projects from Xcel's Wind Development Transfer process, modeled as generic units without transmission costs (six wind projects with total capacity of 1,506 MW);
 - EnCompass includes 400 MW of generic solar at the A.S. King plant in 2030;
 - no additional generic CT additions were available before 2030; and
 - the Plum Creek Wind and Lake Wilson Solar and Storage projects were not included.²¹
- Spot Market Status Between 2027 and 2029:
 - EnCompass allows purchases of spot market capacity at MISO's CONE; and
 - EnCompass allows purchases of spot market energy at forecasted prices.²²
- Spot Market Status Beginning 2030:
 - EnCompass no longer allows spot market purchases of capacity or energy. All requirements must be met through owned or contracted resources.²³ It is not clear

²⁰ *In the Matter of the Petition of Xcel Energy for Approval of the Acquisition of 600 MW of Wind Generation, Order Approving Acquisitions with Conditions*, December 13, 2013, Docket No. E002/M-13-603, (eDockets) [201312-94604-02](#), at 9.

²¹ Petition at 21-22.

²² Petition at 22.

²³ Xcel states that the Spot Market assumptions were necessary to develop the baseline capacity expansion plan. Petition at 22.

what Xcel means by this statement since Xcel's modeling and the Department's modeling both show substantial spot market energy purchases.

- Load Forecast:
 - EnCompass uses the latest (2025v2) load forecast.
- PTC Assumptions:
 - PTCs are assumed for generic resources through 2030 and no PTCs beyond 2030.

Changes to the base case for the ERAS Portfolio Case include Xcel forcing into the model the portfolio of ERAS projects and turning off spot market purchase of capacity and energy. Again, it is not clear what Xcel means by this statement since Xcel's modeling and the Department's modeling both show substantial spot market energy purchases.²⁴ Both the Base Case and the ERAS Portfolio Case were run as an expansion plan, the resulting expansion units locked-in, and then re-run as production cost runs (for both PVRR and PVSC) covering all 8,760 hours in a year. The PVRR and PVSC results are then reported in the Petition.

C.2.2. Xcel's Results for ERAS Portfolio 1

For the Planning Period (2024-2040) Xcel's results show the ERAS Portfolio Case increases PVRR by \$68 million and decreases PVSC by \$19 million. For the Study Period (2024-2050) Xcel's results show the ERAS Portfolio Case increases PVRR by \$30 million and decreases PVSC by \$122 million.²⁵

Other results are:

- reductions in cumulative CO₂ for the ERAS Portfolio Case emissions range from 0.54 million tons (PVSC run) to 0.78 million tons (PVRR run), both for the Planning Period;
- compliance with the CFS under Minn. Stat. § 216B.1691, subd. 2g throughout the Study Period.²⁶

C.3. Analysis of EnCompass Results

C.3.1. Matching Xcel's EnCompass Results

In Department Information Request No. 1, the Department received the inputs, outputs, and post-processing files generated by Xcel in the Company's modeling. This data is verified in a process referred to as "matching," and ensures the modeling runs can be replicated and that the inputs and outputs match. The primary purpose of this step is to ensure that the Department is using the same input data as Xcel. To determine if the Department could match Xcel's results the Department used the same process as in Xcel's most recent IRP.²⁷

²⁴ It could be the case that these changes apply only to the preliminary, expansion plan run.

²⁵ Petition at 23.

²⁶ *Ibid.*

²⁷ *In the Matter of Xcel Energy's 2024-2040 Integrated Resource Plan*, Department, Comment, August 9, 2024, Docket No. E002/RP-24-67 (eDockets) [20248-209394-02](#).

Second, the Department currently has multiple dockets in process with utilities using different EnCompass versions. To avoid potential errors due to different EnCompass versions on various machines, the Department opted to run EnCompass without changing the version currently installed. That choice meant using a different EnCompass version than Xcel. Using a different EnCompass version means that the Department can get different results even if it is using the exact same inputs, making the matching process less accurate.

Xcel's EnCompass results in the Petition come from four scenarios—two production cost runs using PVRR inputs (with and without the ERAS Portfolio 1) and two production cost runs using PVSC inputs (again, with and without the ERAS Portfolio 1).²⁸ The Department was able to match Xcel's results for both runs for the case with ERAS Portfolio 1. For the cases without the ERAS Portfolio 1 the absolute value of the difference was 0.23 percent and 0.28 percent, both of which are greater than the MIP input of .20. Since the Department was using a different EnCompass version and the difference was relatively close to the value necessary to consider a scenario to be matched, the Department did not pursue the reason for the different results.

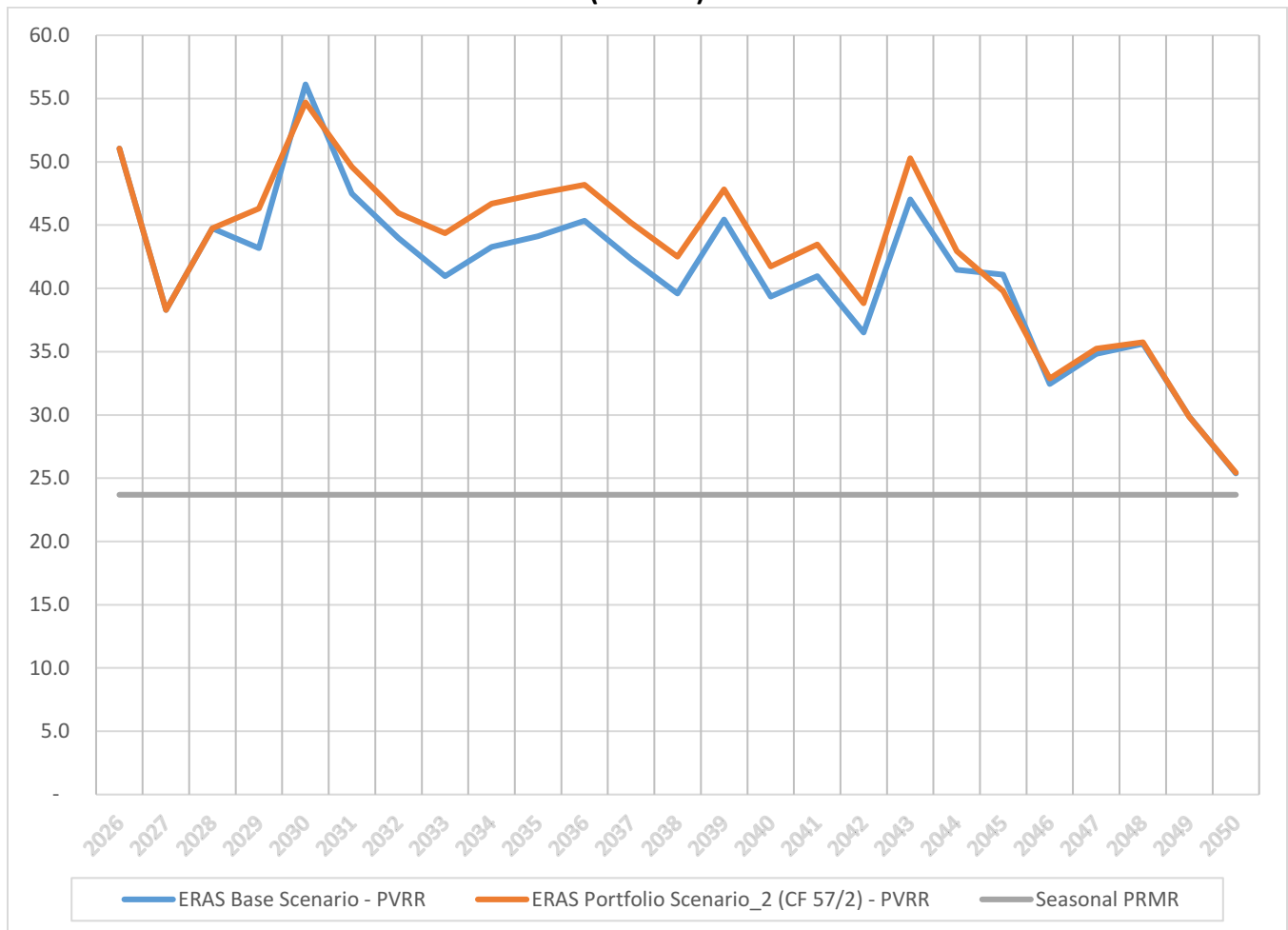
C.3.2. Analysis of EnCompass Results

Note that the analysis of the EnCompass modeling results uses the results from the Department's matching runs because this choice enabled the use of certain monthly outputs, which is necessary to investigate any implications for seasonal factors such as MISO's seasonal capacity market.

First, Charts 1 to 4 show the minimum PRM and the PRM resulting from the expansion plan. In both the scenario without the ERAS Portfolio 1 projects (labeled "ERAS Base Scenario – PVRR") and the scenario with the ERAS Portfolio 1 projects (labeled "ERAS Portfolio Scenario_2 (CF 57/2) – PVRR") Xcel has capacity in excess of the reserve margin.

²⁸ The production cost runs are done after a capacity expansion run. But the results of capacity expansion runs generally are not discussed in Xcel's Petition. This is the same general multi-step process as Xcel used in the most recent IRP.

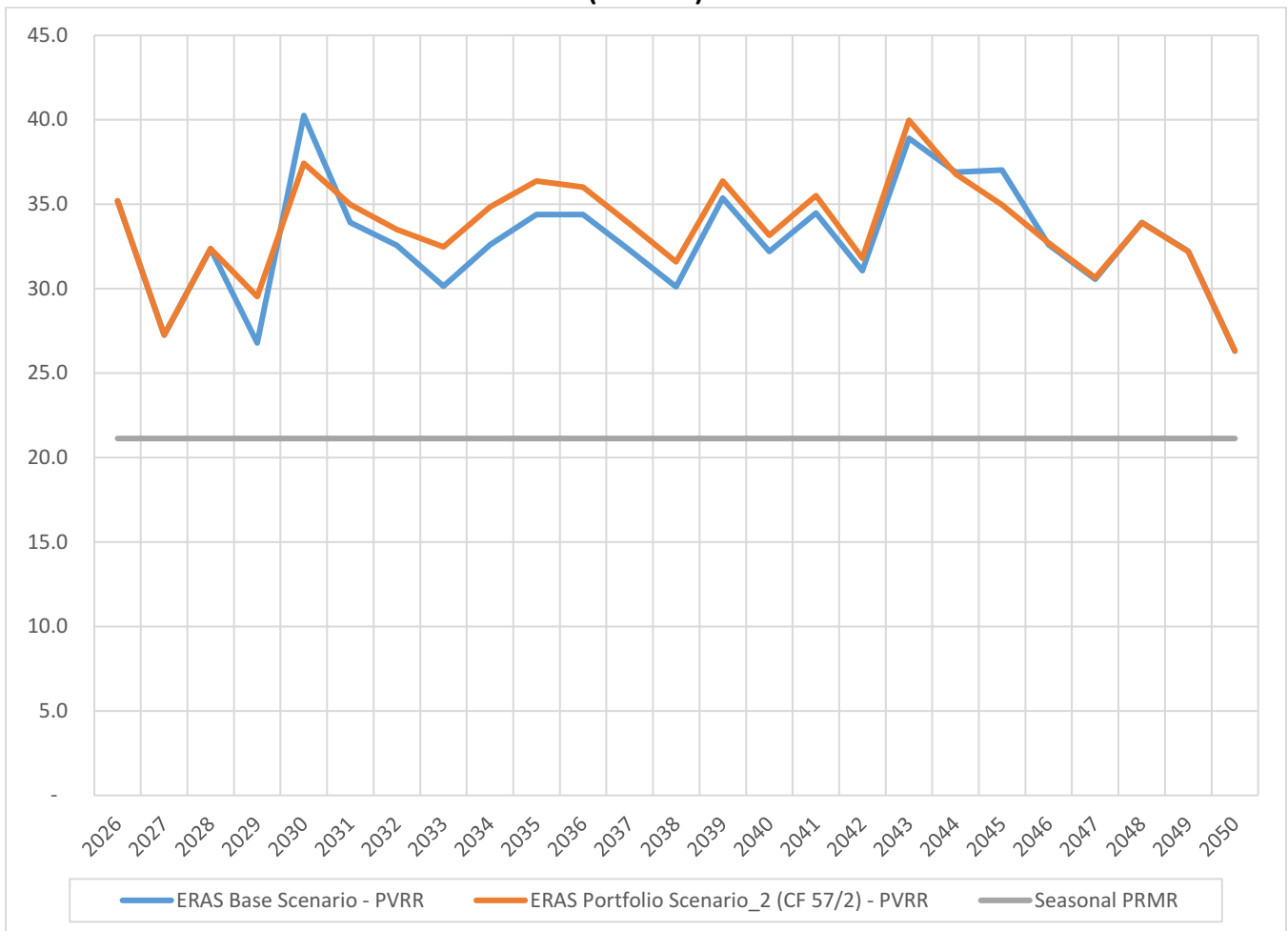
**Chart 1: Winter Minimum and Actual Reserve Margins
 (Percent)**



Note that for Charts 1 to 4 the Seasonal PRMR is the MISO value adjusted for Xcel’s coincidence at the time of MISO’s system peak.²⁹ This is done to be consistent with MISO’s calculation of the quantity of accredited capacity required of Xcel.

²⁹ In the Matter of Xcel Energy’s 2024-2040 Integrated Resource Plan, Xcel, Petition, February 1, 2024, Docket No. E002/RP-24-67 (eDockets) [0242-203027-01](#), at Chapter 3 at 7-11.

**Chart 2: Spring Minimum and Actual Reserve Margins
(Percent)**



**Chart 3: Summer Minimum and Actual Reserve Margins
(Percent)**

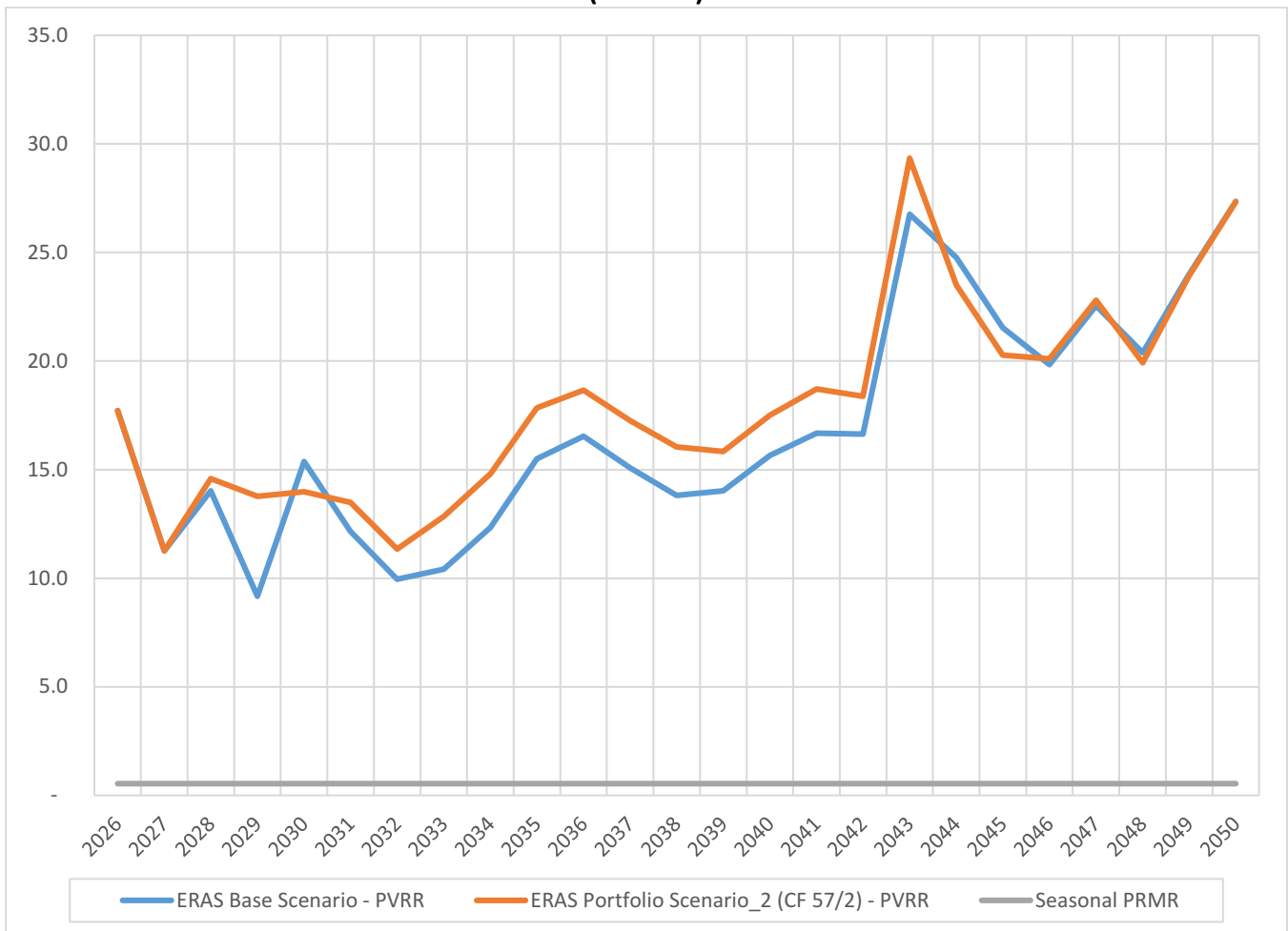
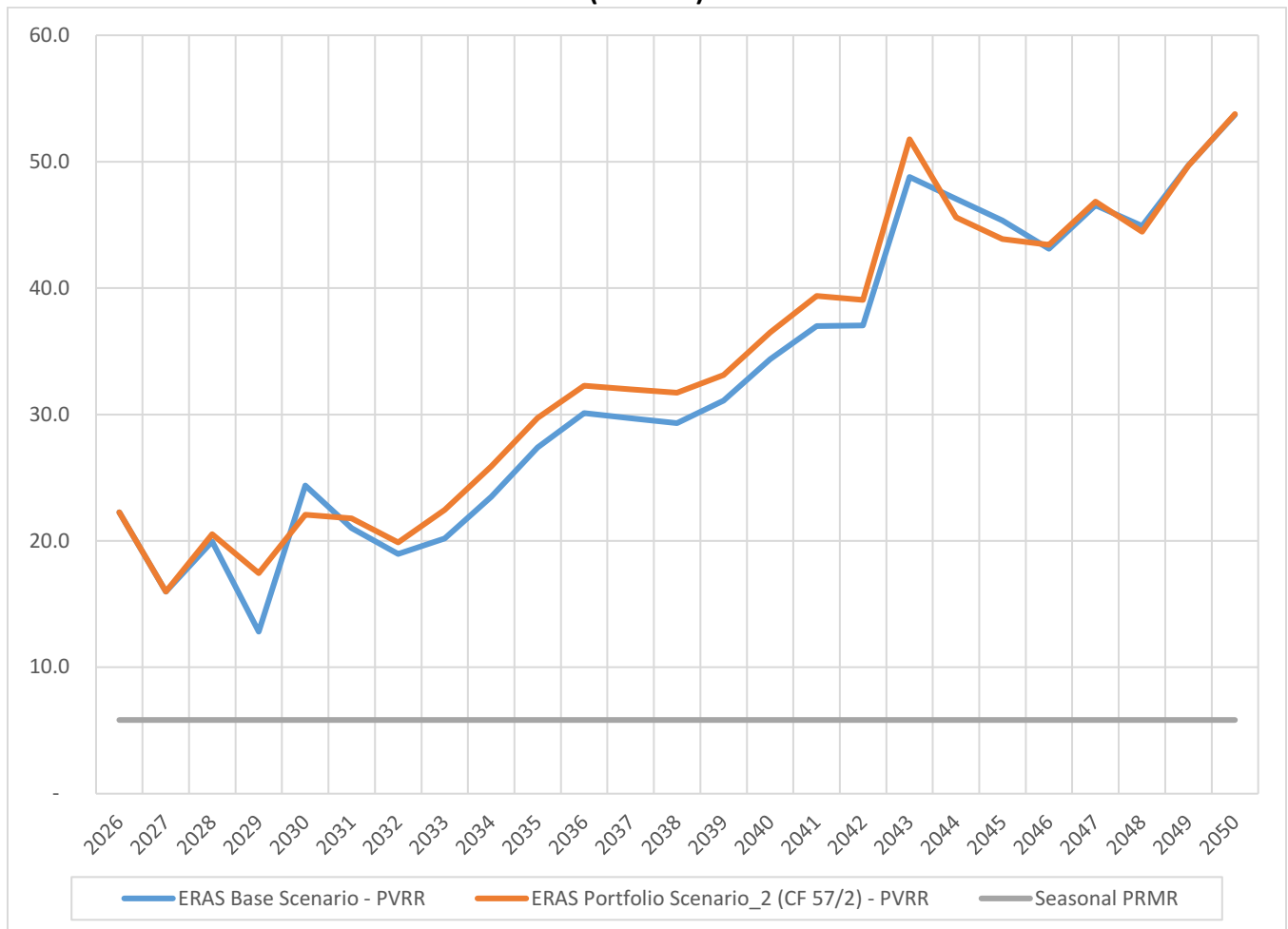
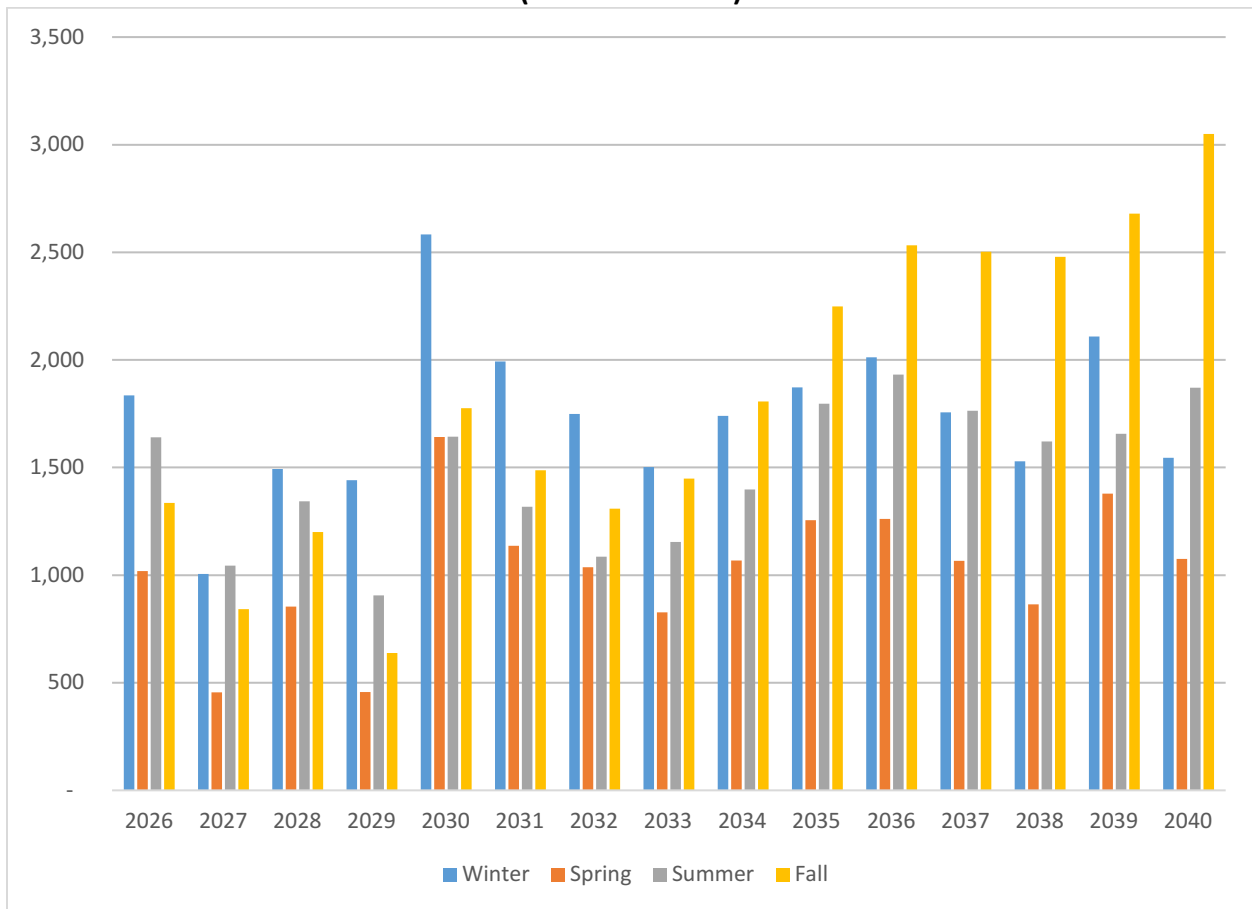


Chart 4: Fall Minimum and Actual Reserve Margins (Percent)



Second, the Department calculated the quantity of excess capacity on Xcel’s system. The results are shown in Chart 5 (for the base case—without the ERAS Portfolio 1 projects) and Chart 6 (with the ERAS Portfolio 1 projects). This calculation was done to determine if the surplus reserves were excessive or were a reasonable response to the uncertainty inherent in MISO’s reliability processes. This process also enabled a determination of how much value EnCompass was deriving from an overbuilt system. The focus was on the quantity of reserves shortly before and after the ERAS Portfolio 1 projects come on-line (2028-’29). Excess reserves further in the future can be adjusted through adjustments to other, subsequent, resource acquisition filings.

**Chart 5: Base Case Surplus Capacity
(accredited MW)**



**Chart 6: ERAS Portfolio Case Surplus Capacity
 (accredited MW)**

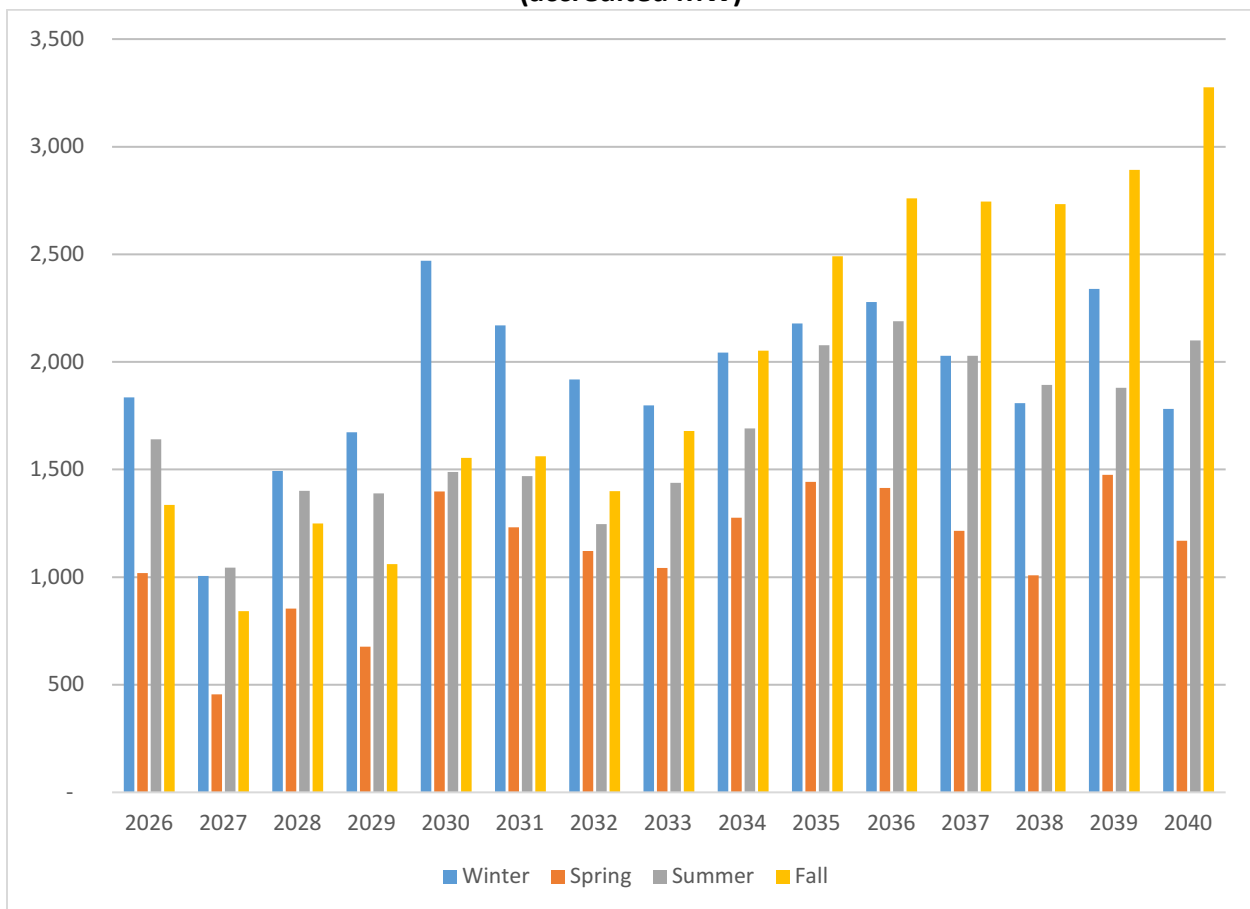


Chart 5 shows that the lowest amount of excess capacity is in the spring of 2027 and 2029. The amount of excess is slightly less than 500 MW in those years. Chart 6 shows that the addition of the ERAS Portfolio 1 projects raises the surplus to about 675 MW in 2029. Overall, EnCompass will derive little to no value from the ERAS Portfolio 1 projects’ excess capacity because Xcel limits payments from the capacity market construct to 500 MW and the model runs were already near or above the 500 MW threshold.³⁰

Third, the Department calculated the difference between the two scenarios in total accredited capacity³¹ by EnCompass resource type. The result was that only two resource types showed a substantial difference.³² The firm capacity for BESS showed an overall increase and the accredited

³⁰ *In the Matter of Xcel Energy’s 2024-2040 Integrated Resource Plan*, Xcel Energy, Petition, February 1, 2024, Docket No. E002/RP-24-67 (eDockets) [20242-203057-01](#), at Appendix F at 19.

³¹ This is the capacity that counts towards the PRM.

³² The only other resource types showing a difference in the expansion plan were wind and solar. The difference in wind was very small (less than 2 MW) and only after 2044. The difference in solar was also small, less than 2 MW in all but 4 years. In both scenarios the sum of the annual capacity differences was negative meaning the ERAS Portfolio 1 case had slightly less wind and solar capacity available than the Base Case, on average.

capacity for Natural Gas CT showed an overall decrease. This is shown in Table 3 below for the years with significant differences.

**Table 3: ERAS Portfolio 1 minus Base Case Expansion Plan³³
 (Accredited MW)**

	Natural Gas CT	BESS
2029	56	426
2030	(572)	418
2031	(258)	410
2032	(258)	419
2033	(144)	428
2034	(144)	437
2035	(144)	446
2036	(144)	400
2037	(144)	408
2038	(144)	416
2039	(144)	366
2040	(144)	373
2041	(144)	380
2042	(144)	380
2043	(214)	555
2044	(214)	55
2045	(214)	55

EnCompass will show some benefits from the avoided CT capacity but the amount avoided capacity shown in Table 3, on its own, will not justify the addition of the ERAS Portfolio 1 projects.³⁴

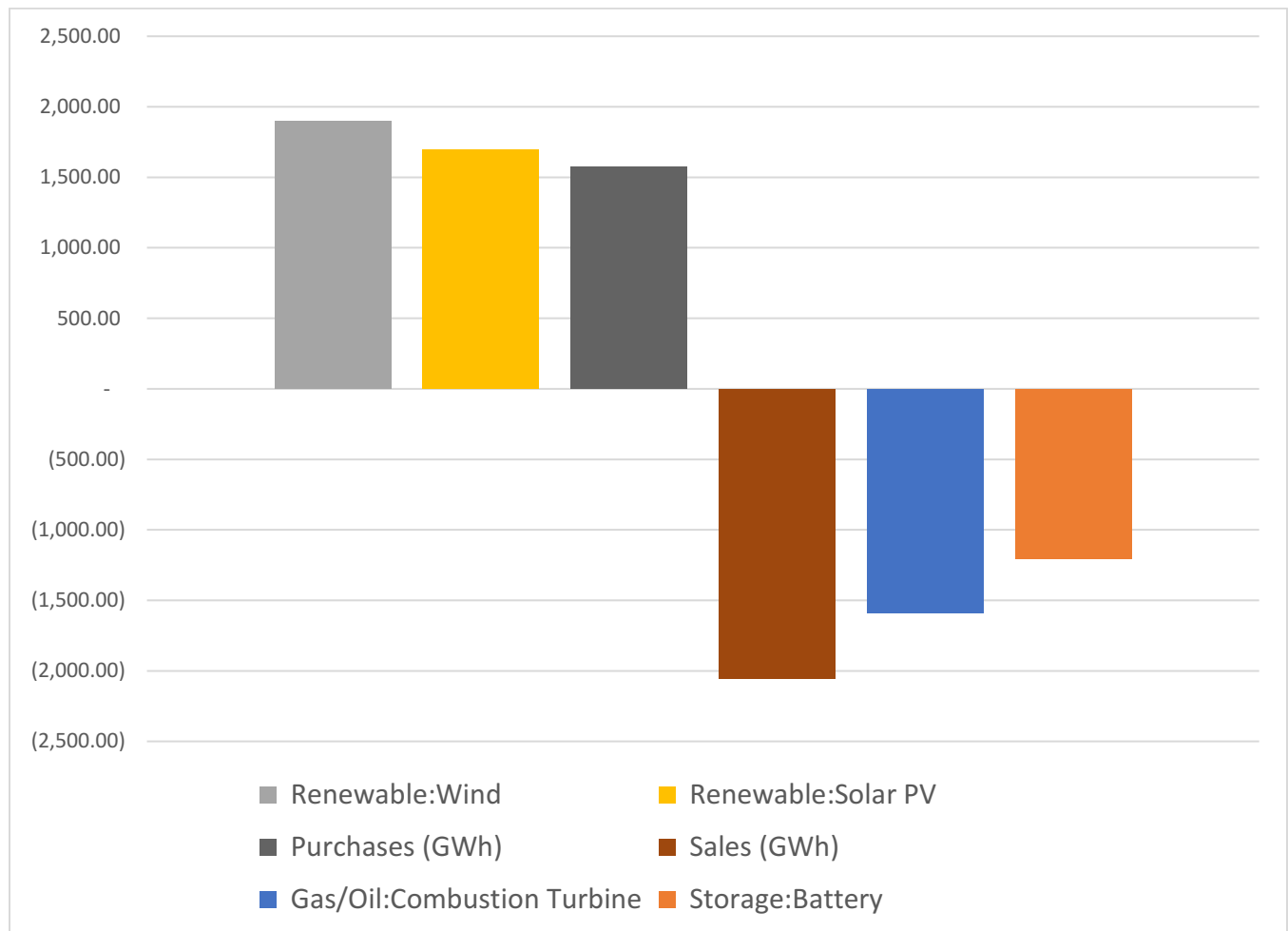
Fourth, the Department calculated the difference between the two scenarios in energy output by EnCompass resource type. The results from the PVSC production cost run are summarized in Chart 7 below. Chart 7 shows both sources (resource types generating more energy in the ERAS Portfolio 1 case) and sinks (resource types generating less energy in the ERAS Portfolio 1 case).³⁵ Only resource types with a difference of at least ± 500 GWh over the study period are shown in Chart 7.

³³ These results are derived from EnCompass' annual outputs and will reflect summer, the season with the highest need for accredited capacity.

³⁴ In fact, all of the changes in internal costs will not justify the addition of the ERAS Portfolio 1 projects since the ERAS Portfolio 1 projects fail a PVR test.

³⁵ Note that storage does not generate electricity but does consume electricity due to losses in storage and thus shows up as a sink in the chart because more energy is run through the BESS charge/discharge process.

**Chart 7: Energy by Resource Type
(ERAS Portfolio 1 minus Base Case Total GWh 2024-'55)**



What is notable in Chart 7 is that the ERAS Portfolio 1 case is showing:

- from increased energy from Xcel’s wind and solar units;
- decreased energy from Xcel’s CT units;
- a reduction in Xcel’s spot energy market sales; and
- an increase in Xcel’s spot energy market purchases.

The increased energy from wind and solar, despite virtually no change in capacity, means that EnCompass is using the extra BESS capacity to reduce wind and solar curtailments. However, it is important to understand limitations in how EnCompass determines curtailment.

EnCompass, as structured by Xcel and other utilities, generally does not have system topology—a complex system of transmission to connect various generators and loads. Instead, nearly all of the generating units and load on Xcel’s system are connected to each other with an assumed loss factor to

move energy from generators to load.³⁶ There are no “locational” differences. This simplification speeds up the resource plan analysis with, in most instances, little cost in terms of missing information in the model. However, when specific units are being analyzed instead of generic units, the simplification can present problems.

The simplification in model inputs (lack of topology) means that curtailment in EnCompass does not occur due to local circumstances, as is the case for some generators on the Buffalo Ridge, for example. Instead, curtailment occurs when, in any one hour, total load plus the size of the connection to the energy spot market is less than the must run generation. For example, if total load is 100 MW and the size of the connection to the energy spot market is 50 MW but must run generation is 200 MW, then EnCompass will report 50 MW of curtailment that hour (200 MW less 150 MW). Due to this difference in system topology (generic EnCompass inputs from an IRP analyzing ERAS Portfolio 1 projects with a specific location) it cannot be known if the reduction in curtailment calculated by EnCompass for ERAS Portfolio 1 will actually be realized.

Also, in EnCompass Xcel is a net seller into the energy spot market by a significant margin (typically 2,000 to 5,000 GWh annually). By increasing purchases and reducing sales, the ERAS Portfolio 1 case is reducing Xcel’s overall sell-side energy market risk.

Fifth, the Department reviewed the expansion plan. Even with the ERAS Portfolio 1 projects EnCompass adds about 1.3 GW of additional peaking capacity—BESS and CT—by 2031. Other expansion units added in 2030-’31 include 2.3 GW of solar and 1.8 GW of wind. These additions amount to about 2.3 GW of accredited capacity by 2031.

This large quantity of resource additions that the modeling shows are necessary by 2031 adds substantial risk to Xcel’s position in that such large quantities of capacity may not be available at a reasonable price.³⁷ Chart 6, which includes the 2.3 GW by 2031 of accredited capacity additions, shows that Xcel would be short of the PRM without the ERAS Portfolio 1 projects and further additions of accredited capacity by 2030. The projects proposed in this ERAS Portfolio can mitigate this risk. Overall, this data indicates the question at hand is not whether the ERAS Portfolio 1 projects are needed. The question is whether better projects could be found in a timely manner in a future RFP. When weighing the risk of future RFP project availability, the Commissions should consider uncertainty in supply chain disruptions and continued federal actions that can hamper development of energy projects.

³⁶ There are a handful of exceptions where a group of generating units are modeled as a separate ‘system’ with a single transmission connection to Xcel’s main system. This is done to reflect unique circumstances, such as multiple generators using the same interconnection capacity.

³⁷ For example, see *In the Matter of Xcel Energy’s Distributed Solar Energy Standards Status Update*, Xcel Energy, Status Report, December 30, 2025, Docket No. E002/M-25-441 (eDockets) [202512-226328-01](#).

C.3.3. Conclusion

The Department draws the following conclusions from the EnCompass analysis:

- Xcel’s results—a net cost in PVRR terms and a net benefit in PVSC terms—reflect the information input to EnCompass which has two important factors to consider;
 - there is a risk that the modeled curtailment benefits are limited in their accuracy given the non-locational nature of Encompass modeling, these benefits are an important part of the model’s PVRR/PVSC results;³⁸
 - Xcel’s EnCompass inputs omit potentially important costs; see the discussion of imputed debt below; and
- Xcel’s EnCompass results are showing a large need for accredited capacity in the near future that could be mitigated by approval of these projects.

D. XCEL’S ACQUISITION PROCESS

The CFEC expansion is an addition to a project that was selected through Xcel’s Commission-approved bidding process. However, neither the CFEC expansion nor the Sandhill BESS and Benton II BESS projects were selected via Xcel’s Commission-approved bidding process. The Commission’s most recent order regarding competitive bidding only required Xcel to use a formal bidding process for resources in the approved in the Five-Year Action Plan.³⁹ Instead of using the formal process Xcel compared the pricing of the BESS projects in recent formal RFPs. The Department concludes that the 2024 IRP Order does not require a separate RFP for the projects in question because they provide capacity in excess of the requirements in the Five-Year Action Plan. The Department also concludes that reference to projects in on-going RFPs⁴⁰ as evidence of current market pricing is reasonable in this instance.

E. ECONOMIC DEVELOPMENT

Minn. Stat. § 216B.1691, subd. 9 (a) describes reasonable actions the Commission must take to maximizes net benefits to all Minnesota citizens.⁴¹

- (1) the creation of high-quality jobs in Minnesota paying wages that support families;
- (2) recognition of the rights of workers to organize and unionize;
- (3) ensuring that workers have the necessary tools, opportunities, and economic assistance to adapt successfully during the energy transition, particularly in environmental justice areas;
- (4) ensuring that all Minnesotans share (i) the benefits of clean and renewable energy, and (ii) the opportunity to participate fully in the clean energy economy;

³⁸ There is substantial curtailment in Minnesota, the only question is if the location of the Benton II and Sandhill BESS projects will enable those projects to relieve that congestion.

³⁹ 2024 IRP Order at Order Point 9.

⁴⁰ See Xcel’s 800 MW Firm Dispatchable process in Docket No. E002/CN-23-212 and 2024 Solar, Wind, and BESS RFP in Docket No. E002/M-24-230.

⁴¹ [Minn. Stat. § 216B.1691, subd. 9 \(a\)](#).

- (5) ensuring that statewide air emissions are reduced, particularly in environmental justice areas; and
- (6) the provision of affordable electric service to Minnesotans, particularly to low-income consumers.

In the 2024 IRP Order, the Commission required Xcel to “work with parties representing organized labor to maximize socioeconomic benefits to customers and host communities by prioritizing creation of high-quality jobs and apprenticeship pathways for local workers in the implementation of projects and programs included in the resource plan.”⁴² In addition, the Commission required Xcel to “work with the Environmental Justice Advisory Board to better understand how to prioritize and incentivize investments and economic benefits for underserved communities.”⁴³

In the PPAs the Company required bidders to utilize union labor for the construction of the facilities.⁴⁴ In addition, the projects, as a package, will reduce CO₂ emissions.⁴⁵ Thus, the proposed projects meet the first, second, and fifth criteria listed above.

Overall, the Department concludes that the Project meets the requirements or for economic development as described in Minn. Stat. § 216B.1691, subd. 9 (a) and the 2024 IRP Order.

F. IMPUTED DEBT

The Petition discusses the concept of imputed debt due to PPAs.⁴⁶ In short, some PPAs create financial obligations that are similar enough to interest and principal payments on corporate debt that credit ratings agencies impute a debt principal balance for the PPA and include that imputed debt along with other debt in calculating a utility’s credit metrics (e.g. a cash flow to debt ratio). In this way, PPAs can cause a utility’s credit metrics to deteriorate, and may in turn put negative pressure on its credit ratings. Absent other changes to offset the impacts of the PPAs, the utility will likely have to pay higher interest rates on new debt than it otherwise would have. Alternatively, the utility could try to maintain its credit ratings and metrics by offsetting some or all of the increase in imputed debt by altering its capital structure to include more equity and less debt. Either way, imputed debt puts upwards pressure on a utility’s overall cost of capital, which would, in turn, put upward pressure on rates.

The Petition at Table 5 estimates the imputed debt due to the BESS PPAs in question here to be about \$625 million. Xcel stated “[d]ue to the material negative credit quality implications expected as a result of these contracts, the Company intends to propose mitigation through an increase in its equity ratio in its next electric rate case filing.”⁴⁷

The Department acknowledges that an increase in the equity ratio to address imputed debt, if ultimately approved by the Commission, would represent an additional cost associated with the PPAs.

⁴² 2024 IRP Order at Order Point 26.

⁴³ *Id.*, at Order Point 27.

⁴⁴ Petition at 16.

⁴⁵ *Id.*, at 23.

⁴⁶ *Id.*, at 17-19.

⁴⁷ *Id.*, at 19.

Xcel did not reflect any imputed debt costs for the PPA projects in the new Encompass modeling. In That means the modeling could be biased in favor of the resource portfolio being modeled because the resources potentially will incur imputed debt costs, depending upon a future Commission determination regarding imputed debt.

To provide some information the Department calculated that Xcel’s imputed debt estimate of \$625 million would equate to roughly \$20 million per year in incremental financing costs. The Department also calculated that, over the 15-year life of ERAS Portfolio 1 PPAs, an annual cost of \$16.5 million would eliminate the \$122 million in PVSC savings⁴⁷ shown by Xcel’s EnCompass modeling. Therefore, the imputed debt of the Sandhill BESS and Benton BESS PPAs could turn the PVSC savings into a net cost for the ERAS Portfolio 1.⁴⁸

The Department notes that in addition to the imputed debt associated with the two BESS PPAs at issue in this Docket, Xcel has several other proposed PPAs before the Commission in other dockets that it estimates could cause it to incur over \$2 billion in additional imputed debt. A summary of Xcel’s recent estimates regarding imputed debt is provided in Table 4 below.

Table 4: Summary of Imputed Debt in Recent Resource Acquisitions

PPA	Docket No.	Description	Imputed Debt (\$ millions)	Calculation Year
Cannon Falls CT	CN-23-212	Original Group ⁴⁸	\$519	2028
Mankato CC	CN-23-212	Original Group	\$598	2028
Mankato BESS	CN-23-212	Original Group	\$74	2028
North Star BESS	CN-23-212	Original Group	\$138	2028
Cottage Grove BESS	CN-23-212	Replacement ⁴⁹	\$105	2028
Crowned Ridge BESS	M-24-230	2024 RFP ⁵⁰	\$127	2028
Crane BESS	M-24-230	2024 RFP	\$257	2028
Mayhew Lake BESS	M-24-230	2024 RFP	\$130	2028
Subtotal			\$1,948	
Sandhill BESS	RP-24-067	ERAS Group 1 ⁵¹	\$247	2029
Benton II BESS	RP-24-067	ERAS Group 1	\$378	2029
Subtotal			\$625	

IRPs determine the size, type, and timing of resource needs and deal with generic expansion units. Therefore, imputed debt generally does not need to be addressed in IRPs because there is no need to assume any one generic unit will be a PPA. Imputed debt can matter in a resource acquisition process when the utility is choosing between self-build and PPA options.

⁴⁸ 800 MW Petition at 17.

⁴⁹ 800 MW Supplement at 5.

⁵⁰ 2024 RFP Petition at 44.

⁵¹ Petition at 18.

In this proceeding Xcel is proposing to acquire BESS resources in excess of the need determined in the prior IRP and is relying on new Encompass modeling to justify the additional resources. Xcel did not reflect imputed debt costs for the PPA projects in the new Encompass modeling. That means the modeling could be biased in favor of the resource portfolio being modeled because the resources potentially will incur imputed debt, depending upon a future Commission determination regarding imputed debt. Alternative projects (from a future RFP) that are PPAs also would incur imputed debt but alternative projects that are self-builds would not incur imputed debt.

To provide some information the Department calculated that Xcel's imputed debt estimate of \$625 million would equate to roughly \$20 million per year in incremental financing costs. The Department also calculated that, over the 15-year life of ERAS Portfolio 1 PPAs, an annual cost of \$16.5 million would eliminate the \$122 million in PVSC savings⁵² shown by Xcel's EnCompass modeling. Therefore, the imputed debt of the Sandhill BESS and Benton BESS PPAs would turn the PVSC savings into a net cost for the ERAS Portfolio 1.⁵³

These calculations assume the appropriate comparison is the ERAS Portfolio 1 to Xcel's base case (which does not include the projects) as modeled in EnCompass. If the actual comparison is to other PPAs to fill the need, then the calculated imputed debt cost would appear in both scenarios (with the ERAS Portfolio 1 and with a set of alternative PPAs) and would not impact the modeling results.

The Department recommends that, in future resource acquisition filings, Xcel consider applying an estimated cost to PPA projects to provide a more accurate price comparison to self-build projects. For this case, the potential for an imputed debt cost reduces the value of the ERAS Portfolio 1 to the point where it is not showing clear PVSC benefits when compared to the alternative base case (a no build).

G. PPA REVIEW

G.1. Overview of Risks

The Department generally divides the analysis of PPAs into two risk categories, financial risks and operational risks. For PPAs, there are two main financial risks that may have negative impacts on Xcel's ratepayers. They are:

- a Seller default and termination of the PPA before the expiration of the contract period; and
- entitlement by a lender or other party, as a result of the Seller's failure to pay debt, to take over the project and terminate the PPA.

Under these events, Xcel may be forced to find more costly replacement power when the PPA is terminated. Further, under both events, the projects may be terminated and jeopardize Xcel's compliance with various statutory requirements and Commission orders.

⁵² Petition at 23.

⁵³ An imputed debt of \$20 million annually over the 15-year life of ERAS Portfolio 1 PPAs would result in a net PVSC cost of about \$26 million for the ERAS Portfolio 1 rather than a net benefit.

The operational risks are the risks that the project in question will not be built and operated as expected. These risks include a complete shutdown or a partial shutdown of the Project due to technical problems. In the case of a partial shutdown, ratepayers must be assured that their payments for capacity and energy are reduced accordingly. In the case of a complete shutdown, once again Xcel may face the risk of non-compliance with the various legislative or Commission requirements and may need to find what could be more expensive replacement power.

G.2. CFEC PPA

The Petition's Attachment A contains an amendment to the PPA between Xcel and Invenergy Cannon Falls LLC. Xcel provided an amended base PPA as part of the 800 MW Petition.

G.2.1. Ratepayer Protections—Financial Risk

The CFEC PPA Amendment [**TRADE SECRET DATA HAS BEEN EXCISED**]

G.2.2. Ratepayer Protections—Operational Risk

The CFEC PPA Amendment [**TRADE SECRET DATA HAS BEEN EXCISED**]

G.2.3. Curtailment Provisions

The CFEC PPA Amendment [**TRADE SECRET DATA HAS BEEN EXCISED**]

G.2.4. Conclusion Regarding PPA

The Department concludes that the CFEC PPA Amendment has minimal impact and sufficiently protects ratepayers from financial and operational risks.

G.3. Sandhill BESS PPA

G.3.1. Ratepayer Protections—Financial Risk

Events that could cause the Sandhill BESS PPA to be terminated before the expiration of the contract period include:

- a Seller default due to **[TRADE SECRET DATA HAS BEEN EXCISED]**
- an EFA such as denial of a permit;
- a SCTL such as loss of investment tax credit benefits;
- **[TRADE SECRET DATA HAS BEEN EXCISED]**

These events that create an increase in risk are discussed in more detail below.

First, Article 12.1 describes events that constitute Seller's default which include Seller's: **[TRADE SECRET DATA HAS BEEN EXCISED]**

Article 12.2 details another possible Seller default event arising from failure to achieve CPD milestones or the COD by their respective target dates. **[TRADE SECRET DATA HAS BEEN EXCISED]** If Seller fails to meet COD deadlines altogether, Xcel has the right to terminate the PPA and collect damages.⁵⁴

Second, Article 14 includes provisions related to **[TRADE SECRET DATA HAS BEEN EXCISED]**

Third, a similar provision allows either party to terminate the PPA if an EFA preventing the Seller from achieving **[TRADE SECRET DATA HAS BEEN EXCISED]** or COD target continues for over 365 days.⁵⁵ An EFA can include the denial or withholding of necessary permits due to a presidential executive order or other federal action.

Fourth, the PPA includes a provision allowing the Seller to terminate the PPA if an SCTL occurs before COD.⁵⁶ An SCTL is a decrease in ITCs and/or PTCs resulting in the Seller losing at least **[TRADE SECRET DATA HAS BEEN EXCISED]**

Fifth, Article 5 includes provisions **[TRADE SECRET DATA HAS BEEN EXCISED]**

[TRADE SECRET DATA HAS BEEN EXCISED]

In a separate proceeding Xcel provided additional information regarding **[TRADE SECRET DATA HAS BEEN EXCISED]** That additional information is equally applicable to this proceeding and clarifies the risks regarding the contractual terms in question.

⁵⁴ Petition at 15.

⁵⁵ Petition at 17.

⁵⁶ *Ibid.*

The Sandhill BESS PPA includes various provisions protecting ratepayers from financial risk, detailed below. First, Article 11.1 describes the Security Fund required to be established by the Seller to account for damages caused by the Seller. [TRADE SECRET DATA HAS BEEN EXCISED] Xcel can draw from the Security Fund amounts necessary to cover any [TRADE SECRET DATA HAS BEEN EXCISED]

Second, Article 16 and Exhibit E describe [TRADE SECRET DATA HAS BEEN EXCISED]

Third, Article 17 contains the [TRADE SECRET DATA HAS BEEN EXCISED]

Fourth, Article 19 includes restrictions on [TRADE SECRET DATA HAS BEEN EXCISED]

Finally, Article 20.2 describes the treatment of [TRADE SECRET DATA HAS BEEN EXCISED]

G.3.2. Ratepayer Protections—Operational Risk

Article 4.5 lists [TRADE SECRET DATA HAS BEEN EXCISED]

Article 5.5 requires [TRADE SECRET DATA HAS BEEN EXCISED] This requirement ensures that Xcel's payments are for energy actually received. The PPA also requires [TRADE SECRET DATA HAS BEEN EXCISED]

The PPA includes provisions that address operational risk related to variation in storage capacity availability and efficiency by adjusting capacity payments. First, the PPA has a CAF which adjusts payments such that Xcel only pays for the storage capacity that is actually available for dispatch in a given period.⁵⁷ This feature establishes that:

If the facility is unavailable due to forced outages or underperformance, the Seller's payment will be reduced accordingly. This mechanism incentivizes the Seller to maximize system availability and reliability throughout the contract term.⁵⁸

Second, the PPA has a RTE adjustment which adjusts payments such that Xcel does not pay for a system with excessive losses in storage. This feature establishes that:

The contract requires the battery storage system to meet its committed round-trip efficiency (RTE) levels each year. RTE is the ratio of energy discharged compared to energy charged reflecting the efficiency of the project's charging capabilities. If the actual RTE falls below guaranteed levels, the monthly payment is reduced. This ensures that the Seller is financially motivated to maintain the battery's efficiency over time.⁵⁹

Details on the calculation of this adjustment [TRADE SECRET DATA HAS BEEN EXCISED]

⁵⁷ *Id.*, at 28.

⁵⁸ Petition at 14.

⁵⁹ *Id.*, 14.

Article 8.3 ensures that the Seller is responsible for penalties for failure to respond to dispatch. In this case if the Seller:

fails to accurately or timely respond to a dispatch notice, and the market operator imposes a penalty or charge on the Company as a result, the Company may pass through those charges to the Seller by reducing the next monthly payment.⁶⁰

Article 8.4 contains an Excess Throughput provision.⁶¹ In this case the Seller:

entitled to an additional payment for each megawatt-hour (MWh) of excess energy delivered ... These payments provide an incentive for the Seller to make the system available even beyond its planned throughput, while also protecting the facility from overuse that could degrade the asset.⁶²

Specifically, Article 8.4 **[TRADE SECRET DATA HAS BEEN EXCISED]** Additionally, Article 8.4 **[TRADE SECRET DATA HAS BEEN EXCISED]** These measures allow for flexibility in how the Company uses the BESS system while providing protections for the long-term life of the facility.

Finally, Article 10.3 includes a provision to address the risks of **[TRADE SECRET DATA HAS BEEN EXCISED]**

G.3.3. Curtailment Provisions

Article 7 states that the Seller **[TRADE SECRET DATA HAS BEEN EXCISED]** This article is the only article related to the curtailment of the facility. As a battery storage unit, the Sandhill BESS is not subject to curtailment in the same way renewable facilities are as the Sandhill BESS is a dispatchable resource that stores energy. If there is congestion on the grid preventing the use of the facility at any time, that power will not be lost; it will be usable at some later time. As such the Department concludes that Xcel ratepayers would be reasonably protected from curtailment risks.

G.3.4. Conclusion Regarding PPA

The Department concludes that the Sandhill BESS PPA sufficiently protects ratepayers from financial and operational risks.

⁶⁰ Petition at 15.

⁶¹ Petition at Attachment B at 31.

⁶² Petition at 14-15.

G.4. Benton II BESS PPA

G.4.1. Ratepayer Protections—Financial Risk

Events that could cause the Benton II BESS PPA to be terminated before the expiration of the contract period include:

- a Seller default due to **[TRADE SECRET DATA HAS BEEN EXCISED]**
- an EFA;
- a SCTL;
- **[TRADE SECRET DATA HAS BEEN EXCISED]**

These events that create an increase in risk are discussed in more detail below.

First, Article 12.1 describes events that constitute Seller's default which include Seller's: **[TRADE SECRET DATA HAS BEEN EXCISED]**

Article 12.2 details another possible Seller default event arising from failure to achieve critical path development (CPD) milestones or the COD by their respective target dates. **[TRADE SECRET DATA HAS BEEN EXCISED]** If Seller fails to meet COD deadlines altogether, Xcel has the right to terminate the PPA and collect damages.⁶³

Second, Article 14 includes provisions related to **[TRADE SECRET DATA HAS BEEN EXCISED]**

Third, a similar provision allows either party to terminate the PPA if an EFA preventing the Seller from achieving **[TRADE SECRET DATA HAS BEEN EXCISED]** or COD target continues for over 365 days.⁶⁴ An EFA can include the denial or withholding of necessary permits due to a presidential executive order or other federal action.

Fourth, the PPA includes a provision allowing the Seller to terminate the PPA if an SCTL occurs before COD.⁶⁵ An SCTL is a decrease in ITCs and/or PTCs resulting in the Seller losing at least **[TRADE SECRET DATA HAS BEEN EXCISED]**

Fifth, Article 5 includes provisions **[TRADE SECRET DATA HAS BEEN EXCISED]**

In a separate proceeding Xcel provided additional information regarding **[TRADE SECRET DATA HAS BEEN EXCISED]** That additional information is equally applicable to this proceeding and clarifies the risks regarding the contractual term in question.

⁶³ Petition at 15.

⁶⁴ Petition at 17.

⁶⁵ *Ibid.*

The Benton II BESS PPA includes various provisions protecting ratepayers from financial risk, detailed below.

First, Article 11.1 describes the Security Fund required to be established by the Seller to account for damages caused by the Seller. **[TRADE SECRET DATA HAS BEEN EXCISED]** Xcel can draw from the Security Fund amounts necessary to cover any **[TRADE SECRET DATA HAS BEEN EXCISED]**.

Second, Article 16 and Exhibit E describe **[TRADE SECRET DATA HAS BEEN EXCISED]**.

Third, Article 17 contains the **[TRADE SECRET DATA HAS BEEN EXCISED]**.

Fourth, Article 19 includes restrictions on **[TRADE SECRET DATA HAS BEEN EXCISED]**.

Finally, Article 20.2 describes the treatment of **[TRADE SECRET DATA HAS BEEN EXCISED]**.

G.4.2. Ratepayer Protections—Operational Risk

Article 4.5 lists **[TRADE SECRET DATA HAS BEEN EXCISED]**.

Article 5.5 requires **[TRADE SECRET DATA HAS BEEN EXCISED]** This requirement ensures that Xcel's payments are for energy actually received. The PPA also requires **[TRADE SECRET DATA HAS BEEN EXCISED]**.

The PPA includes provisions that address operational risk related to variation in storage capacity availability and efficiency by adjusting capacity payments. First, the PPA has a CAF which adjusts payments such that Xcel only pays for the storage capacity that is actually available for dispatch in a given period.⁶⁶ This feature establishes that:

If the facility is unavailable due to forced outages or underperformance, the Seller's payment will be reduced accordingly. This mechanism incentivizes the Seller to maximize system availability and reliability throughout the contract term.⁶⁷

Second, the PPA has a RTE adjustment which adjusts payments such that Xcel does not pay for a system with excessive losses in storage. This feature establishes that:

The contract requires the battery storage system to meet its committed round-trip efficiency (RTE) levels each year. RTE is the ratio of energy discharged compared to energy charged reflecting the efficiency of the project's charging capabilities. If the actual RTE falls below guaranteed

⁶⁶ *Id.*, at 27.

⁶⁷ Petition at 14.

levels, the monthly payment is reduced. This ensures that the Seller is financially motivated to maintain the battery's efficiency over time.⁶⁸

Details on the calculation of this adjustment **[TRADE SECRET DATA HAS BEEN EXCISED]**.

Article 8.3 ensures that the Seller is responsible for penalties for failure to respond to dispatch. In this case if the Seller:

fails to accurately or timely respond to a dispatch notice, and the market operator imposes a penalty or charge on the Company as a result, the Company may pass through those charges to the Seller by reducing the next monthly payment.⁶⁹

Article 8.4 contains an Excess Throughput provision.⁷⁰ In this case the Seller:

entitled to an additional payment for each megawatt-hour (MWh) of excess energy delivered ... These payments provide an incentive for the Seller to make the system available even beyond its planned throughput, while also protecting the facility from overuse that could degrade the asset.⁷¹

Specifically, Article 8.4 **[TRADE SECRET DATA HAS BEEN EXCISED]** Additionally, Article 8.4 **[TRADE SECRET DATA HAS BEEN EXCISED]**. These measures allow for flexibility in how the Company uses the BESS system while providing protections for the long-term life of the facility.

Finally, Article 10.3 includes a provision to address the risks of **[TRADE SECRET DATA HAS BEEN EXCISED]**.

G.4.3. Curtailment Provisions

Article 7 states that the Seller **[TRADE SECRET DATA HAS BEEN EXCISED]**. This article is the only article related to the curtailment of the facility. As a battery storage unit, the Benton II BESS is not subject to curtailment in the same way renewable facilities are as the Benton II BESS is a dispatchable resource that stores energy. If there is congestion on the grid preventing the use of the facility at any time, that power will not be lost; it will be usable at some later time. As such the Department concludes that Xcel ratepayers would be reasonably protected from curtailment risks.

G.4.4. Conclusion Regarding PPA

The Department concludes that the Benton II BESS PPA sufficiently protects ratepayers from financial and operational risks.

⁶⁸ *Ibid.*

⁶⁹ Petition at 15.

⁷⁰ Petition at Attachment C at 31.

⁷¹ Petition at 14-15.

H. FCR RECOVERY

The Petition requests the Commission authorize the Company to recover, through the FCR, pursuant to Minn. Stat. § 216B.16, subd. 7(3),⁷² the Minnesota jurisdictional portion of the costs incurred under the PPAs from Minnesota retail customers. Specifically, Xcel states:

Under the terms of our currently effective Fuel Clause Rider in our tariff, “[t]he energy cost of purchases from a qualifying facility” are “qualifying costs” that comprise the Cost of Energy. Because the projects satisfy the conditions of a qualifying facility (QF), the Company plans to recover the costs of these PPAs through our Fuel Clause Rider.⁷³

The Department notes that *energy* costs incurred by PPAs are recovered via Xcel’s FCR. *Capacity* costs due to PPAs are included in base rates and are also addressed in a capacity tracker for a true-up of base rate recovery to actuals. It is unclear whether the monthly capacity payments in the PPAs are included in the costs that Xcel plans to recover through the FCR. Since these payments are capacity costs, the Department’s understanding is that they are addressed in base rates and the capacity tracker, and not eligible for FCR recovery. The energy costs recoverable via Xcel’s FCR could include the cost of energy that Xcel buys to charge the BESS, less the revenue from the discharging energy that Xcel sells.

The Department requests that Xcel clarify in reply comments whether it is petitioning to recover capacity payments through the FCR. If it is requesting to recover capacity payments through the FCR, the Department recommends that Xcel provide a justification for the eligibility of these costs for FCR recovery.

I. COMMISSION NOTICE

I.1. Approve the PPAs?

The first issue listed in the Notice is: “should the Commission approve the PPAs?”

The Department concludes that the PPAs all adequately protect ratepayers from financial, operational, and curtailment risks. Considering the risks related to curtailment benefits, imputed debt costs, and Xcel’s overall position in MISO’s capacity and energy markets, the Department concludes that the improvement in Xcel’s position in MISO’s capacity and energy markets outweighs the risks associated with curtailment and imputed debt. Therefore, the Department recommends the Commission approve the PPAs.

⁷² [Minn. Stat. § 216B.16, subd. 7.](#)

⁷³ Petition at 24.

1.2. Authorize FCR Recovery?

The second issue listed in the Notice is: “should the Commission the Company to recover, through the FCR, pursuant to Minn. Stat. § 216B.16 subd. 7(3), the Minnesota jurisdictional portion of the costs incurred under the PPAs from Minnesota retail customers?”

As noted above, the Department recommends the Commission approve FCR recovery for the Minnesota jurisdictional portion of the energy costs. The Department also recommends that Xcel clarify in reply comments whether it is requesting to recover capacity payments through the FCR. If it is requesting to recover capacity payments through the FCR, the Department recommends that Xcel provide a justification for the eligibility of these costs for FCR recovery.

1.3. Other Issues?

The third issue listed in the Notice is: are there any other topics related to this matter?

The Department has no other issues at this time.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the information in the record the Department has prepared recommendations which are provided below. The recommendations correspond to the subheadings of Section III above.

F. IMPUTED DEBT

- The Department recommends that, in future resource acquisition filings, Xcel consider applying an estimated cost to PPA projects to provide a more accurate price comparison to self-build projects.

G. FCR RECOVERY

- The Department recommends that Xcel clarify in reply comments whether it is requesting to recover capacity payments through the FCR. If it is requesting to recover capacity payments through the FCR, the Department recommends that Xcel provide a justification for the eligibility of these costs for FCR recovery.

I. COMMISSION NOTICE

- I.1. The Department recommends the Commission approve the PPAs.
- I.2. the Department recommends the Commission approve FCR recovery for the Minnesota jurisdictional portion of the energy costs. The Department also recommends that Xcel clarify in reply comments whether it is requesting to recover capacity payments through the FCR. If it is requesting to recover capacity payments through the FCR, the Department recommends that Xcel provide a justification for the eligibility of these costs for FCR recovery.

March 18, 2026

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. E002/RP-24-67

Dear Ms. Bergman:

On March 17, 2026 Northern States Power Company, doing business as Xcel Energy (Xcel) filed a letter with revised pricing for the Cannon Falls Energy Center (CFEC) expansion power purchase agreement (PPA) amendment.¹ The Department reviewed Xcel's letter and notes that the need that the CFEC expansion would address has not changed. While the PPA amendment increases the cost of the CFEC expansion, mostly due to transmission costs, the capacity cost would still be less than the storage projects Xcel has included in the same package. So, even at the higher price, the CFEC expansion still would have been selected. The Department continues to recommend **approval of the CFEC expansion PPA** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Sydnie Lieb, Ph.D.
Assistant Commissioner, Office of Regulatory Analysis

SR/ad

¹ *In the Matter of Northern States Power Company d/b/a Xcel Energy's Petition for Approval of Generator Projects for MISO's Expedited Resource Addition Study (ERAS)*, Xcel Energy, Letter, March 17, 2026, Docket No. E002/RP-24-67, (eDockets) [20263-229384-02](#).



414 Nicollet Mall
Minneapolis, MN 55401

January 15, 2026

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

—Via Electronic Filing—

RE: REPLY COMMENTS
PROPOSED GENERATOR PROJECTS FOR MISO ERAS
DOCKET NO. E002/RP-24-67

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments to the Minnesota Public Utilities Commission in response to the January 5, 2026 Comments of the Department of Commerce and the Office of the Attorney General—Residential Utilities Division, pursuant to the Commission’s December 5, 2025 Notice of Comment Period in the above-referenced docket. These Reply Comments address the Company’s Petition filed on December 3, 2025 requesting approval of Power Purchase Agreements (PPAs) for three Commission-verified projects for which third-party developers submitted an Expedited Resource Addition Study (ERAS) application to the Midcontinent Independent System Operator (MISO) in support of the Company’s resource needs, as follows:

- 200 MW Sandhill Energy Storage,
- 300 MW Benton Energy Storage, and
- 45-70 MW of incremental capacity that would result from planned upgrades at the Cannon Falls Energy Center.

We thank parties for their comments and thoughtful review of our Petition. The proposed ERAS 1 project portfolio is expected to deliver benefits to our customers by providing the capacity and energy we need to serve them safely, reliably, and affordably.

We respond to parties and provide additional requested information, below.

A. Department of Commerce

The Department's comments largely align with our requests for Commission action as stated in our Petition. We outline the Department's conclusions and recommendations below.

The Department concluded:

- Our Petition is complete.¹
- Our EnCompass modeling results – a net cost in PVRR terms and a net benefit in PVSC terms – reflect model inputs that have two key limitations:
 - Curtailment benefits may be inaccurate due to non-locational modeling, yet they significantly influence PVRR/PVSC outcomes.
 - Certain costs, such as imputed debt, are omitted from the inputs.
- The EnCompass analysis indicates a large near-term need for accredited capacity, which could be reduced if the proposed ERAS projects are approved.²
- Referencing projects in ongoing RFPs as evidence of current market pricing is reasonable.³
- Overall, the ERAS projects meet the requirements for economic development as described in Minn. Stat. § 216B.1691, subd. 9(a) and the 2024 IRP Order.⁴
- The PPAs adequately protect ratepayers from financial, operational, and curtailment risks.⁵

The Department made three recommendations to the Commission:

1. Approve the PPAs.
2. Authorize the Company to recover the Minnesota jurisdictional portion of the costs incurred under the PPAs from Minnesota retail customers under Minn. Stat. § 216B.16, with the understanding that only the energy-related costs (such as energy purchased to charge the BESS and excess throughput payments) are eligible for recovery through the Fuel Cost Rider (FCR), while capacity payments will be recovered through base rates and the capacity tracker.⁶
3. In future resource acquisition filings, the Company should consider applying an estimated cost for imputed debt associated with PPA projects, to enable a more accurate price comparison to self-build projects.⁷

¹ Department Comments (Jan 5, 2026) at p. 3.

² Id. at p. 17.

³ Id.

⁴ Id. at p. 18.

⁵ Id. at p. 34.

⁶ Id. at pp. 34-35.

⁷ Id. at p. 20.

We appreciate the Department's support of our proposal.

In response to the Department's request for clarification regarding the FCR recovery process, we provide the following details regarding the cost recovery for the ERAS PPAs:

- **Energy Costs:** Consistent with Minn. Stat. § 216B.16, energy costs incurred under the PPA – including the cost of energy purchased to charge the BESS, less any revenue from energy discharged and sold – are eligible for recovery through the FCR.
- **Capacity Costs:** Capacity payments under the PPAs are not recovered through the FCR. Instead, these costs would be included in base rates and tracked via the capacity tracker as proposed in our current rate case in Docket No. E002/GR-24-320, which allows for a true-up between base rate recovery and actual incurred costs.
- **Excess Throughput Payments:** If the Company incurs excess throughput charges under the PPAs (for energy discharged above the annual throughput limit), these costs may also be eligible for FCR recovery, as they are directly related to energy usage.

In summary, we clarify that only energy-related costs – such as those for charging the BESS and any excess throughput payments – are proposed for recovery through the FCR. Capacity payments will be addressed through base rates and the capacity tracker, not the FCR.

Finally, the Company agrees to include an estimated cost for any imputed debt associated with PPA projects in future resource acquisition processes.

B. Office of the Attorney General

The OAG's comments highlight contract pricing and risk allocation, and capital structure considerations. Below, we address each of these areas in turn.

1. Contract Pricing and Risk Allocation

We recognize the OAG's concerns about cost escalation and risk-shifting mechanisms, particularly the 20 percent adjustment for extraordinary geopolitical risks.⁸ Our approach has always been to advance only those projects where the risk to our customers is

⁸ OAG Comments (Jan. 5, 2026), at pp. 5-6.

perceived as low, and the New Trade Measure adjustment methodology is consistent with Commission Orders in similar matters.⁹

The inclusion of the 20 percent adjustment was intentional and designed to facilitate project approval and move projects forward efficiently. This mechanism is not automatic; it features a clear and practical cap and is subject to review by an independent auditor, who will help ensure that any cost adjustments are just, reasonable, and transparent.

Importantly, requiring a second Commission review for each cost adjustment, should they occur, would require a contractual condition precedent and necessitate a renegotiation of project terms with a contract amendment. This process puts each contract at further risk and could delay the start of construction and jeopardize eligibility for tax credits. Such added risk and delay would not only impact project timelines and costs but could ultimately affect system reliability and diminish the broader benefits these projects are intended to deliver.

Our goal, as we face unprecedented geopolitical headway, is to balance timely project delivery with robust protections for our customers. The New Trade Measure mechanism achieves this by providing certainty and efficiency for all stakeholders, while maintaining strong oversight and alignment with Commission precedent. We believe this approach best serves the interests of our customers.

2. *Capital Structure and Equity Ratio*

The OAG recommends that any changes to the Company's capital structure or equity ratio be considered in the appropriate regulatory forums, such as annual capital structure dockets or rate cases, rather than being addressed or pre-authorized in this proceeding.¹⁰ We agree that the Commission does not need to take action regarding imputed debt at this time. As stated in our Petition, the Company intends to propose mitigation through an increase in our equity ratio in our next electric rate case filing.

C. **Conclusion**

The above-noted PPAs will deliver benefits to our customers by providing the capacity and energy we need to serve them safely, reliably, and affordably.

⁹ See *In the Matter of the Petition of Northern States Power Company, d/b/a Xcel Energy, for Approval of Sherco Solar 3 and Apple River Solar Power Purchase Agreement*, Docket No. E002/M-22-403 at Order Point 5a (October 23, 2023) and *In the Matter of the Petition of Minnesota Power for Approval of Investments and Expenditures in the Boswell Solar Projects for Recovery through Minnesota Power's Renewable Resource Rider under Minn. Stat. § 216B.1645*, at Order Point 5 (May 13, 2025).

¹⁰ OAG Comments at pp. 5-6.

For these reasons, we respectfully request that the Commission take the following actions:

- Find that the Company's proposed ERAS 1 project portfolio is in the public interest;
- Approve the Power Purchase Agreements (PPAs) provided with the Petition;
- Authorize the Company to recover, through the Fuel Clause Rider, pursuant to Minn. Stat. § 216B.16 subd. 7(3), the Minnesota jurisdictional portion of the energy costs incurred under the PPAs from Minnesota retail customers. Additionally, authorize recovery of capacity payments through base rates and the capacity tracker; and
- Establish a procedural schedule such that the Commission may complete deliberations by the end of February 2026, ahead of a substantial non-refundable payment required upon execution of the Generator Interconnection Agreement (GIA).

As noted in our Petition, the Company expects to submit a second Petition in early 2026 requesting approval of additional projects the Commission verified for ERAS and that were submitted and accepted into the MISO ERAS process.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Shannon Whiton at shannon.whiton@xcelenergy.com or me at jody.l.londo@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

JODY L. LONDO
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

c: Service List

CERTIFICATE OF SERVICE

I, Robin Benson, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission ORDER

Docket Numbers: E-002/RP-24-67

Dated this **3rd** day of **April, 2026**

/s/ Robin Benson

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84	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
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86	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
87	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	24-67
88	Michelle	Larson	michelle@redwingchamber.com	Red Wing Area Chamber of Commerce		439 Main Street Red Wing, MN Bay Point Park MN, 55066 United States	Electronic Service		No	24-67
89	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
90	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
91	Kavita	Maini	kmairi@wiri.com	KM Energy Consulting,		961 N Lost Woods Rd	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				LLC		Oconomowoc WI, 53066 United States				
92	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	24-67
93	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	24-67
94	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
95	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	24-67
96	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	24-67
97	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
98	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
99	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	24-67
100	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
101	Travis	Morrison	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN,	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55772 United States				
102	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
103	Will	Mulhern	mulhern@fresh-energy.org	Fresh Energy			Electronic Service		No	24-67
104	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	24-67
105	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	24-67
106	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	24-67
107	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
108	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
109	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
110	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
111	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	24-67
112	Joseph	O'Brien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
113	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-67
114	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
115	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	24-67
116	Marsha	Parlow	mparlow@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
117	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
118	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
119	Gordon	Pietsch	gpietsch@greenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
120	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
121	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-67
122	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
123	Jody	Puddu	jody.puddu@pic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
124	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential	1400 BRM Tower 445 Minnesota St St. Paul MN,	Electronic Service		Yes	24-67

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					Utilities Division	55101-2131 United States				
125	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	24-67
126	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	24-67
127	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
128	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
129	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	24-67
130	Zachary	Ruzycski	zruzycki@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
131	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	24-67
132	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
133	Ronald J.	Schwartz	rschwartz@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-67
134	Jessie	Seim	jessie.seim@pic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67

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135	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
136	Janet	Shaddix Eling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-67
137	Joel	Smith	jsmith@mnchippewa.tribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-67
138	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-67
139	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
140	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
141	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-67
142	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
143	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	24-67
144	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
145	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
146	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67

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147	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
148	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	24-67
149	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	24-67
150	Camille	Tanhoff	kamp@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
151	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	24-67
152	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	24-67
153	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	24-67
154	Jackie	Van Norman	jvannorman@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
155	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	24-67
156	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	24-67

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157	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	24-67
158	Trent	Waite	twait@greenergy.com			null null, null United States	Electronic Service		No	24-67
159	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
160	Elizabeth	Wheeler	ewheeler@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-67
161	Steve	White	steve.white@lojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
162	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
163	John	Williams	jwilliams@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
164	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
165	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
166	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
167	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	24-67
168	Kurt	Zimmerman	kzimmer@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
169	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67