

Appendix C

Exemption Request



30 West Superior Street, Duluth, MN 55802
218.772.2641, www.mnpower.com

12300 Elm Creek Boulevard, Maple Grove, MN 55369
763.445.5000, www.greatriverenergy.com

April 19, 2023

VIA E-FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

**Re: In the Matter of the Application for a Certificate of Need for the Iron
Range – Benton County – Big Oaks Transmission Project
Request for Exemption from Certain Certificate of Need Application
Data Requirements
Docket No. E015, ET2/CN-22-416**

Dear Mr. Seuffert:

Minnesota Power and Great River Energy respectfully submit this Request for Exemptions from Certain Certificate of Need Application Content Requirements to the Minnesota Public Utilities Commission pursuant to Minnesota Rule 7849.0200, Subp. 6

If you have questions or need additional information, please contact either David Moeller, Minnesota Power's Senior Regulatory Counsel at dmoeller@allete.com or 218-723-3963; or Brian Meloy, Great River Energy's Associate General Counsel at bmeloy@GREnergy.com or 763-445-5212.

Sincerely,

David R. Moeller

David Moeller
Minnesota Power
Senior Regulatory Counsel

/s/ Brian Meloy

Brian Meloy
Great River Energy
Associate General Counsel

cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben
Valerie Means
Matthew Schuerger
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER AND GREAT RIVER
ENERGY FOR A CERTIFICATE OF NEED FOR THE
NORTHLAND RELIABILITY PROJECT 345 kV
TRANSMISSION LINE

MPUC Docket No. E015, ET2/CN-22-416

**REQUEST FOR EXEMPTION FROM
CERTAIN CERTIFICATE OF NEED
APPLICATION CONTENT
REQUIREMENTS**

I. INTRODUCTION

Minnesota Power and Great River Energy (collectively, “Applicants”) respectfully submit this request for exemptions from certain content requirements for a Certificate of Need application for the Northland Reliability Project (“Project”) pursuant to Minn. R. 7849.0200, subp. 6. Applicants intend to file a combined Application for a Certificate of Need and Route Permit for the Northland Reliability Project pursuant to Minn. Stat. §§ 216B.243 and 216E.03 in the summer of 2023.

The Project consists of two major segments:

- 1) Segment 1: construction of a new, approximately 140-mile long, double-circuit 345 kilovolt (“kV”) transmission line connecting the existing Iron Range Substation, a new Riverton Series Compensation Station (described below), and the existing Benton County Substation, and generally located near existing transmission line corridors; and
- 2) Segment 2: replacement of two existing transmission lines.
 - a. Replace approximately 20-mile 230 kV line with two 345 kV circuits from the Benton County Substation to the new Big Oaks Substation along existing transmission corridors on double circuit 345 kV structures; and
 - b. Replace an approximately 20-mile 345 kV line from the Benton County Substation to the existing Sherco Substation in Sherburne County along existing transmission corridors using double circuit 345 kV structures.

The Project will also involve the following improvements to the power grid:

- 1) expansion of the existing Iron Range Substation, located near Grand Rapids, and expansion of the existing Benton County Substation, located near St. Cloud, and reconfiguring existing transmission lines at the Iron Range and Benton County substations; and
- 2) construction of a new series compensation station at or near the existing Riverton Substation and reconfiguring existing transmission lines in the Riverton area.

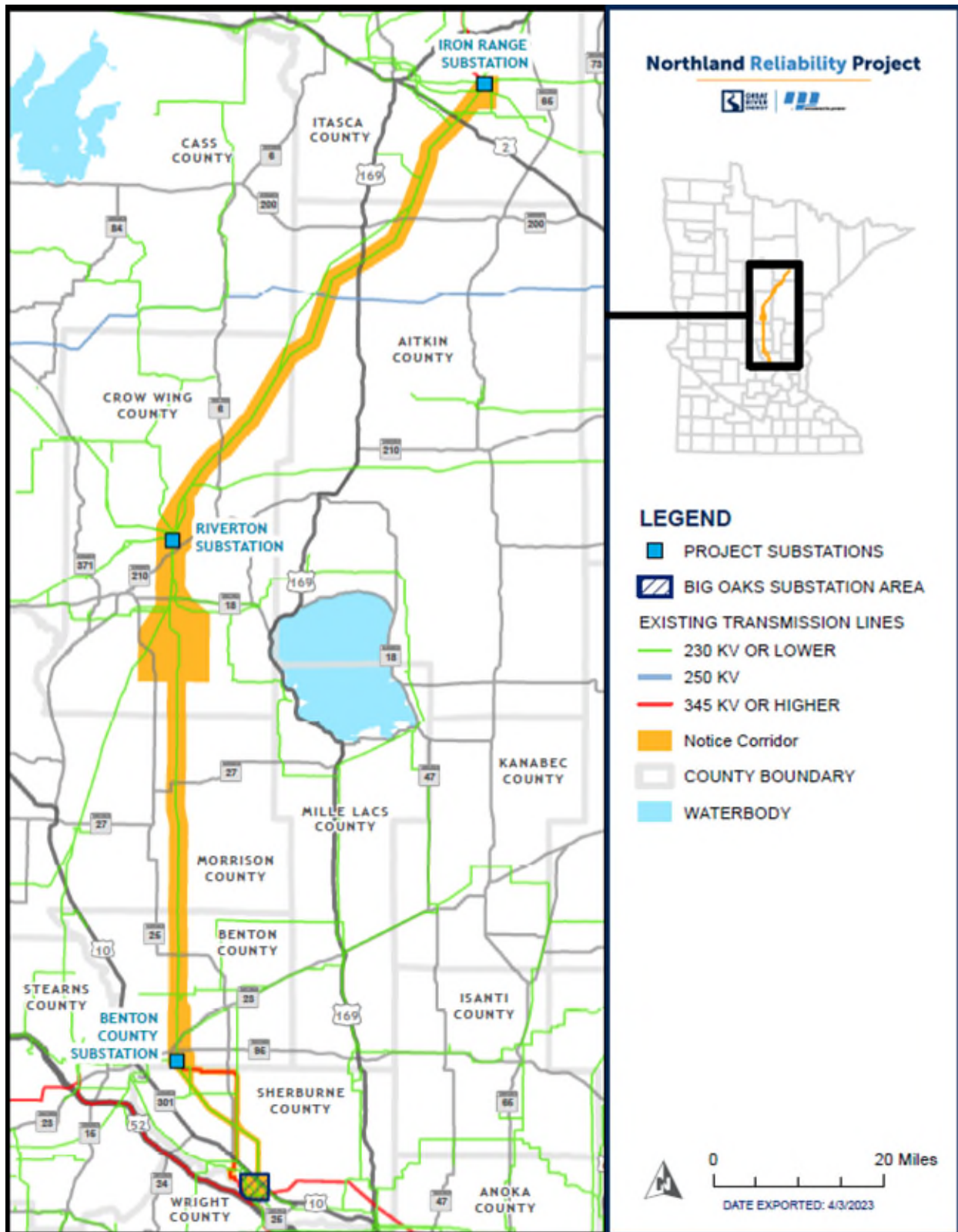
Applicants believe that certain Certificate of Need application content requirements in Minn. R. Ch. 7849 should be modified to better address the nature of this Project. The Minnesota Public Utilities Commission (“Commission”) has granted similar exemptions for other transmission line projects in the recent past.¹ Applicants therefore respectfully request that the Commission grant exemptions from certain requirements as provided under Minn. R. 7849.0200, subp. 6. In lieu of some content requirements, Applicants propose to submit alternative information that will better inform the Commission’s decision regarding the need for the Project.

II. BACKGROUND

An overview of the Northland Reliability Project as well as other transmission facilities in the area is provided in Figure 1 below.

¹ See, e.g., *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In re Request of Minnesota Power for a Certificate of Need for the Great Northern Transmission Line*, Docket No. E015/CN-12-1163, ORDER APPROVING NOTICE PLAN, GRANTING VARIANCE REQUEST, AND APPROVING EXEMPTION REQUEST (Feb. 28, 2013); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for a 115 kV High Voltage Transmission Line in St. Louis and Carlton Counties*, Docket No. E015, ET2/CN-10-973, ORDER APPROVING EXEMPTIONS AND PROPOSED PROVISION OF ALTERNATIVE DATA (Nov. 2, 2010).

FIGURE 1: Northland Reliability Project



The Project was studied, reviewed, and approved as part of the Long-Range Transmission Plan (“LRTP”) Tranche 1 Portfolio by the Midcontinent Independent System Operator, Inc.’s (“MISO”) Board of Directors in July 2022 as part of its annual MISO Transmission Expansion Plan 2021 (“MTEP21”) report.² The Project will ensure that the power grid in northern and central Minnesota continues to operate safely and reliably as energy resources in Minnesota and the regional power system continue to evolve. As generation resources shift from fossil fuels to more renewables, the Project is one part of the solution to: (1) provide system support as fossil-fueled baseload generation is retired; (2) enhance system resiliency during extreme weather events (such as during polar vortex events); (3) facilitate increased capacity to safely and reliably deliver clean energy from where it is produced to where it is needed by customers and members, particularly during the winter season; and (4) plan proactively to meet changing customer and members’ power needs due to decarbonization and electrification.

III. LEGAL STANDARD AND SUMMARY OF EXEMPTION REQUESTS

Minn. R. 7849.0220, subp. 2, part 7849.0240, and parts 7849.0260 to 7849.0340 specify the content requirements for Certificate of Need applications for large high-voltage transmission line (“LHVTL”) projects. The Commission has authority to grant exemptions from the requirements of Minn. R. Ch. 7849 pursuant to Minn. R. 7849.0200, subp. 6, which provides:

Subp. 6 Exemptions. Before submitting an application, a person is exempted from any data requirement of parts 7849.0010 to 7849.0400 if the person (1) requests an exemption from specified rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document. A request for exemption must be filed at least 45 days before submitting an application. The commission shall respond in writing to a request for exemption within 30 days of receipt and include the reasons for the decision. The commission shall file a statement of exemptions granted and reasons for granting them before beginning the hearing.

Based on the standard set forth in this rule, the Commission may grant exemptions when the data requirements: (1) are unnecessary to determine need in a specific case; or (2) can be satisfied by submitting documents other than those required by the rules.³ For the Northland Reliability Project, Applicants request that the Commission grant exemptions

² A copy of MTEP21 report is available online at: <https://cdn.misoenergy.org/MTEP21%20Addendum-LRTP%20Tranche%201%20Report%20with%20Executive%20Summary625790.pdf>.

³ *In re Application for a Certificate of Need for the Appleton – Canby 115 kV Line*, Docket No. E017/CN-06-0677, ORDER GRANTING EXEMPTIONS AND APPROVING NOTICE PLAN (Aug. 1, 2006).

from the following rules as they are either unnecessary to determine the need for the Project or can be satisfied by submitting alternative data:

Minnesota Rule	Scope of Exemption
<i>Minn. R. 7849.0260 A(3) and C(6)</i> (Losses)	Request an exemption from providing Project-specific loss information. The Applicants propose to provide substitute data in the form of overall system losses.
<i>Minn. R. 7849.0270</i> (Peak Demand and Annual Consumption Forecast; System Revenue Requirements)	Request exemption from providing forecasting and capacity information for Applicants' systems and to instead provide forecast information from Applicants' most recent Annual Forecast Report ("AFR") and any forecast information used in analyzing the need for the Project. The Applicants also seek an exemption from providing annual revenue requirements for the Project. Minnesota Power proposes to provide the general rate impact of the Northland Reliability Project on Minnesota Power's customers. Great River Energy will provide an explanation of how MISO spreads wholesale electricity costs and a general estimate of rate impact of the Project on Minnesota customers as well as the general financial effects of the Project on Great River Energy's member cooperatives.
<i>Minn. R. 7849.0280</i> (System Capacity)	Request full exemption from providing a discussion of the ability of the existing system to meet the forecasted demand for electrical energy identified in response to Minn. R. 7849.0270.

<i>Minn. R. 7849.0290</i> (Conservation)	Request exemption from discussing conservation programs and their effect on the forecast information required by Minn. R. 7849.0270. Applicants propose to provide substitute information on their conservation efforts from, as applicable, the Applicants' most recent Conservation Improvement Plan and Integrated Resource Plan filings. The Applicants will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project.
<i>Minn. R. 7849.0300</i> (Consequences of Delay)	Request to be exempt from providing analysis using three confidence levels. Applicants propose to provide substitute data regarding potential impacts caused by delay in implementing the Project.
<i>Minn. R. 7849.0340</i> (No Facility Alternative)	Request to be exempt from providing analysis using three confidence levels. Applicants propose to provide substitute data regarding potential impacts caused by no build alternative.

Each of these requests is discussed in more detail below and summarized in **Attachment A**. This request is being made at least 45 days prior to submitting an application for a Certificate of Need as required by Minn. R. 7849.0200, subp. 6.

IV. REQUESTED EXEMPTIONS

A. Minn. R. 7849.0260 A(3) and C(6) – Proposed LHVTL and Alternatives Application (Losses)

Minn. R. 7849.0260 A(3) requires the applicant to provide the expected losses “under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations.” Minn. R. 7849.0260 C(6) requires similar information (efficiency of proposed system under maximum and average loading along the length of the line). The electrical grid operates as a single, integrated system, which prevents electricity from being “directed” along a particular line or set of lines. Consequently, heat loss takes place across the entire transmission system and is not isolated to a single transmission line within the integrated regional electric grid. Therefore, losses should be calculated across the entire system rather than based on a single transmission line.

Applicants request an exemption from Minn. R. 7849.0260 A(3) and C(6) and propose to provide system losses information in lieu of line-specific losses required by the rules. This

approach is consistent with several prior exemption requests approved by the Commission in other Certificate of Need transmission line dockets.⁴

B. Minn. R. 7849.0270, subps. 1-6 – Peak Demand and Annual Consumption Forecast and System Revenue Requirements

1. Minn. R. 7849.0270, subp. 1 – Peak Demand and Annual Consumption Data

Minn. R. 7849.0270, subp. 1 requires information concerning peak demand, and annual consumption for the applicant's entire service area and system. Because the Northland Reliability Project is intended to support a broad geographic region in MISO, including the entirety of Applicants' service areas, Applicants propose to provide substitute data in the form of systemwide forecast information included in Minnesota Power's and Great River Energy's most recent AFR to be filed this summer in Docket No. E999/PR-23-11. As substitute information, the Applicants will also provide any forecast information used in analyzing the need for the Project. The Commission has previously granted similar exemption requests for other transmission projects.⁵

2. Minn. R. 7849.0270, subps. 2(A) and 2(B) – Customer Annual Consumption Data

Minn. R. 7849.0270, subps. 2(A) and 2(B) requires an applicant to estimate the number of customers and the amount of energy consumed annually by nine classes of customers (residential, commercial, industrial, farming, etc.). Energy consumption data is not

⁴ See, e.g., *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Request of Minnesota Power for a Certificate of Need for the Great Northern Transmission Line*, Docket No. E015/CN-12-1163, ORDER APPROVING NOTICE PLAN, GRANTING VARIANCE REQUEST, AND APPROVING EXEMPTION REQUEST (Feb. 28, 2013); *In re Application of Xcel Energy and ITC Midwest, LLC for the Huntley-Wilmarth 345KV Transmission Line Project*, Docket No. E-002, ET-6675/CN-17-184, ORDER (Sept. 1, 2017); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for a 115 kV High Voltage Transmission Line in St. Louis and Carlton Counties*, Docket No. E015, ET2/CN-10-973, ORDER APPROVING EXEMPTIONS AND PROPOSED PROVISION OF ALTERNATIVE DATA (Nov. 2, 2010).

⁵ See, e.g., *In re Application of Minnesota Power for a Certificate of Need for the HVDC Modernization Project*, Docket No. E015/CN-22-607, ORDER (Feb. 1, 2023); *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for a 115 kV High Voltage Transmission Line in St. Louis and Carlton Counties*, Docket No. E015, ET2/CN-10-973, ORDER APPROVING EXEMPTIONS AND PROPOSED PROVISION OF ALTERNATIVE DATA (Nov. 2, 2010).

relevant to establishing the need for a proposed transmission line. Transmission systems must be sized so that they have sufficient capacity to operate reliably during periods of peak demand. It is the demand for power during peak times that is the primary driver for the Project, not the amount of power consumed annually. Accordingly, it would be appropriate for the Commission to exempt Applicants from providing this data and accept substitute data in the form of AFR and any other forecast information used in analyzing the need for the Project. The Commission has previously granted similar exemption requests for other transmission projects.⁶

3. Minn. R. 7849.0270, subps. 2(C) and 2(D) – System Demand and Peak Demand

Minn. R. 7849.0270, subp. 2(C) seeks an estimate of the demand for power in the system at the time of annual system peak demand. Minn. R. 7849.0270, subp. 2(D) calls for monthly system peak demand data. Evaluation of the need for the transmission capacity for the Northland Reliability Project is based on various demand scenarios across a broad region of MISO. Rather than providing system peak demand data that provides little insight into the specific transmission needs underlying the Northland Reliability Project, Applicants propose to provide AFR forecast information and discussion of the different regional demand scenarios evaluated in the analysis used by the Applicants and MISO to justify the Project. The Commission has previously granted similar exemption requests for other transmission projects.⁷

4. Minn. R. 7849.0270, subp. 2(E) – System Revenue Requirements

Minn. R. 7849.0270, subp. 2(E) requires an estimate of the “annual revenue requirement per kilowatt-hour for the system in current dollars.” Minnesota Power proposes to provide the general rate impact of the Northland Reliability Project on Minnesota Power’s customers. Great River Energy proposes to provide an explanation of how wholesale electricity costs are spread among users of the transmission grid and the general financial

⁶ See, e.g., *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for a 115 kV High Voltage Transmission Line in St. Louis and Carlton Counties*, Docket No. E015,ET2/CN-10-973, ORDER APPROVING EXEMPTIONS AND PROPOSED PROVISION OF ALTERNATIVE DATA (Nov. 2, 2010).

⁷ See, e.g., *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014).

effects of the Project on Great River Energy's member cooperatives. The Commission has previously granted similar exemption requests for other transmission projects.⁸

5. Minn. R. 7849.0270, subp. 2(F) – Weekday Load Factor

Minn. R. 7849.0270, subp. 2(F) requires an applicant's average system weekday load factor for each month. Applicants request an exemption from this requirement because load factor is not a relevant consideration when evaluating the need for a transmission facility. Load factor is a measure of how demand varies over time and is relevant to the need determination for new generation. Moreover, transmission capacity must be designed to meet peak demand and other system power flow circumstances. This is done to ensure there is sufficient transmission capacity to meet lower levels of instantaneous demand. Thus, Applicants respectfully request an exemption from this requirement. The Commission has previously granted similar exemption requests for other transmission projects.⁹

6. Minn. R. 7849.0270, subps. 3-6 – Forecast Methodology, Data Base, Assumptions, and Coordination of Forecasts

Minn. R. 7849.0270, subps. 3-6 require the applicant to detail the forecast methodology employed, identify the database used for the forecast, detail the assumptions made in preparing the forecasts provided under subpart 2 of the same rule, and a description of load forecast coordination efforts with other systems. As stated above, the need for the Project is not prompted by energy consumption, but rather by demand during peak times. Thus, instead of providing energy consumption forecasts, Applicants believe that forecast information and discussion of the different regional demand scenarios evaluated in the analysis used by the Applicants and MISO to justify the Project will better enable the Commission to evaluate the need for this Project. Minnesota Power and Great River

⁸ See, e.g., *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In the Matter of the Application of Great River Energy and Minnesota Power for a Certificate of Need for a 115 kV High Voltage Transmission Line in St. Louis and Carlton Counties*, Docket No. ET2,E015/CN-10-973, ORDER APPROVING EXEMPTIONS AND PROPOSED PROVISION OF ALTERNATIVE DATA (Nov. 2, 2010).

⁹ See, e.g., *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In re Request of Minnesota Power for a Certificate of Need for the Great Northern Transmission Line*, Docket No. E015/CN-12-1163, ORDER APPROVING NOTICE PLAN, GRANTING VARIANCE REQUEST, AND APPROVING EXEMPTION REQUEST (Feb. 28, 2013); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for a 115 kV High Voltage Transmission Line in St. Louis and Carlton Counties*, Docket No. ET2,E015/CN-10-973, ORDER APPROVING EXEMPTION REQUEST (Nov. 2, 2010).

Energy will provide their most recent AFRs. The AFRs discuss forecast methodology, databases, forecast assumptions, and coordination of forecasts with other systems. The Applicants will also provide any other forecast information used in analyzing the need for the Project. The Commission has previously granted similar exemption requests for other transmission projects.¹⁰

In sum, Applicants request an exemption from the data requirements of Minn. R. 7849.0270, subps. 1-6 and will provide relevant AFR forecast information and any other forecast information used in analyzing the need for the Project. This substitute information is better tailored to the need for the Northland Reliability Project and will assist the Commission in evaluating the Project.

C. Minn. R. 7849.0280 – System Capacity

Minn. R. 7849.0280 pertains to system capacity and generation data. The general purpose of this section is to provide a discussion of the ability of the existing system to meet the forecasted demand for electrical energy in response to Minn. R. 7849.0270. Subparts (B) through (I) pertain to an examination of generation adequacy and do not address transmission planning considerations. Applicants therefore request that the Commission grant an exemption from Minn. R. 7849.0280, subps. (B) through (I) and an exemption with alternative data from the Applicants' AFRs provided for Minn. R. 7849.0280, subp. (A). The Commission has previously granted exemption requests from Minn. R. 7849.0280 in several other transmission line Certificate of Need dockets where issues of transmission adequacy, rather than generation adequacy, were at issue.¹¹

D. Minn. R. 7849.0290 – Conservation

Applicants request an exemption from Minn. R. 7849.0290, which relates to conservation programs the applicant has in place and their effect on the forecast information called for in Minn. R. 7849.0270. This rule is intended to ensure that regulated load serving utilities fully consider conservation as well as generation when planning for future needs of their

¹⁰ See, e.g., *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014).

¹¹ See, e.g., *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for a 115 kV High Voltage Transmission Line in St. Louis and Carlton Counties*, Docket No. ET2,E015/CN-10-973, ORDER APPROVING EXEMPTIONS AND PROPOSED PROVISION OF ALTERNATIVE DATA (Nov. 2, 2010).

customers.¹² Applicants' conservation and efficiency information is examined in detail in the resource planning process. All of the information requested by Minn. R. 7849.0290 is contained, as applicable, in Integrated Resource Plan and Conservation Improvement Plan ("CIP") filings filed by Minnesota Power¹³ and Great River Energy.¹⁴ Instead of replicating that information in this application, Applicants propose to present a summary of these filings. This will allow interested parties to pursue their investigation into this issue further through those materials if they wish. The Applicants will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project. This request is consistent with prior exemptions the Commission has granted in other dockets.¹⁵

E. Minn. R. 7849.0300 – Consequences of Delay and Minn. R. 7849.0340 – No Facility Alternative

Minn. R. 7849.0300 requires detailed information regarding the consequences of delay on three specific statistically-based levels of demand and energy consumption. Similarly, Minn. R. 7849.0340 requires a discussion of the impact on existing generation and transmission facilities at the three levels of demand specified in Minn. R. 7849.0300 for the no-build alternative. While Applicants will discuss the consequences of delay and a no build alternative in its application, there is no need to discuss these items in terms of three levels of demand. Rather, as noted above, for evaluating the need for the Project, the relevant inquiry is whether the system can meet peak demand and other system power flow circumstances. The Commission has approved similar partial exemption requests from the requirements of Minn. R. 7849.0300 and 7849.0340 in other transmission line Certificate of Need dockets.¹⁶

¹² *In re Application of Rapids Power LLC for a Certificate of Need for its Grand Rapids Cogeneration Project*, Docket No. IP-4/CN-01-1306, ORDER GRANTING EXEMPTIONS FROM FILING REQUIREMENTS at 6 (Oct. 9, 2001).

¹³ See Docket Nos. E015/RP-21-33; E015/CIP-23-93.

¹⁴ See Great River Energy 2023-2037 Integrated Resource Plan, Docket No. ET-2/RP-22-75 (Mar. 31, 2023), including Appendix D thereto (2020 CIP Approval Letter).

¹⁵ See, e.g., *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In re Request of Minnesota Power for a Certificate of Need for the Great Northern Transmission Line*, Docket No. E015/CN-12-1163, ORDER APPROVING NOTICE PLAN, GRANTING VARIANCE REQUEST, AND APPROVING EXEMPTION REQUEST (Feb. 28, 2013).

¹⁶ See, e.g., *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Docket No. E015/CN-21-140, ORDER APPROVING NOTICE PLAN AND GRANTING VARIANCES AND EXEMPTIONS (May 17, 2021); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Docket No. E015/CN-14-787, ORDER APPROVING EXEMPTION REQUEST (Dec. 3, 2014); *In re Request of Minnesota Power for a Certificate of Need for the Great Northern Transmission Line*, Docket No. E015/CN-12-1163, ORDER APPROVING NOTICE PLAN, GRANTING VARIANCE REQUEST, AND APPROVING EXEMPTION REQUEST (Feb. 28, 2013); *In the Matter of the Application of Northern States Power*

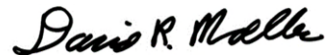
V. CONCLUSION

Applicants respectfully request that the Commission grant the requested exemptions to allow Applicants to provide information that is relevant and appropriate to determining the need for the Northland Reliability Project without imposing unnecessary filing burdens.

April 19, 2023

Respectfully submitted,

MINNESOTA POWER



David R. Moeller
ALLETE Senior Regulatory Counsel
30 West Superior Street
Duluth, MN 55802
(218) 723-3963
dmoeller@allete.com

Kodi Jean Verhalen
Valerie T. Herring
Peter Madsen
Taft Stettinius & Hollister LLP
2200 IDS Center
80 South 8th Street
Minneapolis, MN 55402-2157
(612) 977-8400
kverhalen@taftlaw.com
vherring@taftlaw.com
pmadsen@taftlaw.com

ATTORNEYS FOR MINNESOTA POWER

Company d/b/a Xcel Energy and Great River Energy for a Certificate of Need for the Upgrade of the Southwest Twin Cities (SWTC) Chaska Area 69 kV Transmission Line to 115 kV Capacity, Docket No. E002/CN-11-826, ORDER GRANTING THE COMPANY' EXEMPTION REQUEST (Nov. 4, 2011).

GREAT RIVER ENERGY,
a Minnesota cooperative corporation

/s/ Brian Meloy

Brian Meloy
Associate General Counsel
Great River Energy
12300 Elm Creek Boulevard
Maple Grove, MN 55369
(763) 445-5212
bmeloy@GREnergy.com

Lisa M. Agrimonti
Haley Waller Pitts
Fredrikson & Byron, P.A.
200 South 6th Street, Suite 4000
(612) 492-7344
lagrimonti@fredlaw.com
hwallerpitts@fredlaw.com

ATTORNEYS FOR GREAT RIVER ENERGY

**Northland Reliability Project
Certificate of Need Application
Completeness Checklist**

Authority	Required Information	Location in Application
Minn. R. 7829.2500, subp. 2	Brief summary of filing on separate page sufficient to apprise potentially interested parties of its nature and general content	
Minn. R. 7849.0200, subp. 2	Title Page and Table of Contents	
Minn. R. 7849.0200, subp. 4	Cover Letter	
Minn. R. 7849.0220, subp. 3	Joint Ownership and Multiparty use	N/A
Minn. R. 7849.0240	Need summary and additional considerations	
Subp. 1	Summary of the major factors that justify the need for the proposed facility	
Subp. 2	Relationship of the proposed facility to the following socioeconomic considerations:	—
A.	Socially beneficial uses of the output of the facility	
B.	Promotional activities that may have given rise to the demand for the facility	
C.	Effects of the facility in inducing future development	
Minn. R. 7849.0260	Proposed LHVTL and Alternatives	—
A.	A description of the type and general location of the proposed line, including:	—
(1)	Design voltage	
(2)	Number, sizes and types of conductors	

Authority	Required Information	Location in Application
(3)	Expected losses under projected maximum loading and under projected average loading in the length of the line and at terminals or substations	EXEMPT provided alternative data is supplied
	ALTERNATIVE DATA – Estimated overall system losses	
(4)	Approximate length of the proposed line	
(5)	Approximate locations of DC terminals or AC substations on a map	
(6)	List of likely affected counties	
B.	Discussion of the available alternatives including:	
(1)	New generation	
(2)	Upgrading existing transmission lines	
(3)	Transmission lines with different voltages or conductor arrays	
(4)	Transmission lines with different terminals or substations	
(5)	Double circuiting of existing transmission lines	
(6)	If facility for DC (AC) transmission, an AC (DC) transmission line	
(7)	If proposed facility is for overhead (underground) transmission, an underground (overhead) transmission line	
(8)	Any reasonable combination of alternatives (1) – (7)	
C.	For the facility and for each alternative in B, a discussion of:	—
(1)	Total cost in current dollars	

Authority	Required Information	Location in Application
(2)	Service life	
(3)	Estimated average annual availability	
(4)	Estimated annual O&M costs in current dollars	
(5)	Estimate of its effect on rates system wide and in Minnesota	
(6)	Efficiency expressed for a transmission facility as the estimated losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations	EXEMPT provided alternative data is supplied
(7)	Major assumptions made in subitems (1) – (6)	
D.	A map (of appropriate scale) showing the applicant's system or load center to be served by the proposed LHVTL	
E.	Such other information about the proposed facility and each alternative as may be relevant to determination of need.	
Minn. R. 7849.0270	Content of Forecast	—
Minn. R. 7849.0270, subp. 1	Peak demand and annual consumption data within the applicant's service area and system	EXEMPT provided alternative data is supplied
	ALTERNATIVE DATA – Applicants' most recent Annual Electric Utility Forecast Report and any forecast information used in analyzing the need for the Project.	
Minn. R. 7849.0270, subp. 2	Minnesota forecast data; forecast demand data by customer class, peak period, and month; estimated system annual revenue per kilowatt hour; estimated average weekday system load factor by month.	EXEMPT except as noted below and provided alternative data is supplied
	ALTERNATIVE DATA – Applicants' most recent Annual Electric Utility Forecast	

Authority	Required Information	Location in Application
	Report and any forecast information used in analyzing the need for the Project.	
	Subp. 2 (E) – Alternative explanation of how MISO spreads wholesale electricity costs and general financial impact on Minnesota customers.	
Minn. R. 7849.0270, subp. 3	Detail of the forecast methodology used in subp. 2.	EXEMPT provided alternative data is supplied
Minn. R. 7849.0270, subp. 4	Discussion of database used in current forecasting.	EXEMPT provided alternative data is supplied
Minn. R. 7849.0270, subp. 5	Discussion of each essential assumption made in forecast preparation and sensitivity to variations in assumptions.	EXEMPT provided alternative data is supplied
Minn. R. 7849.0270, subp. 6	Coordination of forecasts.	EXEMPT provided alternative data is supplied
	ALTERNATIVE DATA FOR SUBPS. 3-6 – Applicants' most recent Annual Electric Utility Forecast Report and any forecast information used in analyzing the need for the Project.	
Minn. R. 7849.0280	System Capacity	—
	Description of ability of existing system to meet demand forecast including:	—
A.	Power planning programs	EXEMPT provided alternative data supplied
B.	Seasonal firm purchases and sales	EXEMPT
C.	Seasonal participation purchases and sales	EXEMPT
D.	Load and generation capacity data requested in subitems 1-13 for summer and winter seasons for each forecast year, including anticipated purchases, sales, and capacity retirements and	EXEMPT

Authority	Required Information	Location in Application
	additions except those that depend on a not yet issued certificate of need.	
E.	Summer and winter season load generation and capacity in years subsequent to application contingent on proposed facility	EXEMPT
F.	Summer and winter season load generation and capacity including all projected purchases, sales and generation in years subsequent to application	EXEMPT
G.	List of proposed additions and retirements in generating capacity for each forecast year subsequent to application	EXEMPT
H.	Graph of monthly adjusted net demand and capability with difference between capability and maintenance outages plotted	EXEMPT
I.	Appropriateness and method of determining system reserve margins	EXEMPT
Minn. R. 7849.0290	Conservation Programs	—
A.	Persons responsible for energy conservation and efficiency programs	EXEMPT provided alternative data is supplied
B.	List of energy conservation and efficiency goals and objectives	EXEMPT provided alternative data is supplied
C.	Description of programs considered, implemented and rejected	EXEMPT provided alternative data is supplied
D.	Description of major accomplishments in conservation and efficiency	EXEMPT provided alternative data is supplied
E.	Description of future plans with respect to conservation and efficiency	EXEMPT provided alternative data is supplied
F.	Quantification of the manner by which these programs impact the forecast	EXEMPT provided alternative data is supplied

Authority	Required Information	Location in Application
	ALTERNATIVE DATA FOR A-F – Applicants will provide a summary of each utility's most recent Integrated Resource Plan and Conservation Improvement Program filings. The Applicants will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the Project.	
Minn. R. 7849.0300	Consequence of Delay	EXEMPT from three levels of demand
Minn. R. 7849.0310	Required Environmental Information	
Minn. R. 7849.0330	Transmission Facilities	—
	Data for each alternative that would require LHVTL construction including:	—
A.	For overhead transmission lines	—
(1)	Schematics showing dimensions of support structures	
(2)	Discussion of electric fields	
(3)	Discussion of ozone and nitrogen oxide emissions	
(4)	Discussion of radio and television interference	
(5)	Discussion of audible noise	
B.	For underground transmission facilities:	N/A
(1)	Types and dimensions of cable systems	N/A
(2)	Types and qualities of cable system materials	N/A

Authority	Required Information	Location in Application
(3)	Heat released in kW per foot of cable	N/A
C.	Estimated right-of-way required for the facility	
D.	Description of construction practices	
E.	Description of O&M practices	
F.	Estimated workforce required for construction and O&M	
G.	Description of region between endpoints in likely area for routes emphasizing a three mile radius of endpoints including:	—
(1)	Hydrological features	
(2)	Vegetation and wildlife	
(3)	Physiographic regions	
(4)	Land use types	
Minn. R. 7849.0340	No-Facility Alternative	EXEMPT from three levels of demand

N THE MATTER OF THE APPLICATION OF
MINNESOTA POWER AND GREAT RIVER
ENERGY FOR A CERTIFICATE OF NEED FOR
THE NORTHLAND RELIABILITY PROJECT
345KV TRANSMISSION LINE

MPUC DOCKET No. E015, ET2/CN-22-416

CERTIFICATE OF SERVICE

Jill N. Yeaman certifies that on the 19th day of April, 2023, on behalf of Great River Energy and Minnesota Power, she efiled a true and correct copy of a **Request for Exemption from Certain Certificate of Need Application Content Requirements** via [eDockets](#). Said document is also served via U.S. Mail or email as designated on the attached Service List on file with the Minnesota Public Utilities Commission.

/s/ Jill N. Yeaman

Jill N. Yeaman

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.	200 South Sixth Street Suite 4000 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_22-416_CN-22-416
Steve	Albrecht	Steve.Albrecht@shakopee-dakota.org	Shakopee Mdewakanton Sioux Community	Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake, MN 55372	Electronic Service	No	OFF_SL_22-416_CN-22-416
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_22-416_CN-22-416
Keith	Anderson	keith.anderson@shakopee-dakota.org	Shakopee Mdewakanton Sioux Community	Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake, MN 55372	Electronic Service	No	OFF_SL_22-416_CN-22-416
Jay	Anderson	jaya@cmpas.org	Central Minnesota Municipal Power Agency	7550 Corporate Way Suite 100 Eden Prairie, MN 55344	Electronic Service	No	OFF_SL_22-416_CN-22-416
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_22-416_CN-22-416
Jaime	Arsenault	jaime.arsenault@whiteearth-nsn.gov	White Earth	PO BOX 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_22-416_CN-22-416
Sarah	Beimers	sarah.beimers@state.mn.us	Department of Administration - State Historic Preservation Office	50 Sherburne Avenue Suite 203 St. Paul, MN 55155	Electronic Service	No	OFF_SL_22-416_CN-22-416
David	Bell	david.bell@state.mn.us	Department of Health	POB 64975 St. Paul, MN 55164	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Melanie	Benjamin	melanie.benjamin@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Oodena Drive Onamia, MN 56359	Electronic Service	No	OFF_SL_22-416_CN-22-416
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416
David	Birkholz	david.birkholz@state.mn.us	MN Department of Commerce	Suite 500 85 7th Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_22-416_CN-22-416
Michelle F.	Bissonnette	michelle.bissonnette@hdrinc.com	HDR Engineering, Inc.	Golden Hills Office Center 701 Xenia Ave S Ste 600 Minneapolis, MN 55416	Electronic Service	No	OFF_SL_22-416_CN-22-416
Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation	15484 Migizi Drive Red Lake, MN 56671	Electronic Service	No	OFF_SL_22-416_CN-22-416
Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Oodena Drive Onamia, MN 56359	Electronic Service	No	OFF_SL_22-416_CN-22-416
B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP	Suite 1500 50 South Sixth Street Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_22-416_CN-22-416
Tommy	Brown	Tommy.brown@lojibwe.net	Leech Lake Band of Ojibwe	190 Sailstar Dr NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-416_CN-22-416
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_22-416_CN-22-416
Scott	Buchanan	ScottBuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa	1720 Big Lake Road Cloquet, MN 55720	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community	Prairie Island Indian Community 5636 Sturgeon Lake Road Welch, MN 55089	Electronic Service	No	OFF_SL_22-416_CN-22-416
Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Paper Service	No	OFF_SL_22-416_CN-22-416
PUC	CAO	consumer.puc@state.mn.us	Public Utilities Commission	Consumer Affairs Office 121 7th Place E Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-416_CN-22-416
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-416_CN-22-416
Cathy	Chavers	cchavers@boisfortenmn.gov	Bois Forte Band of Chippewa	Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake, MN 55772	Electronic Service	No	OFF_SL_22-416_CN-22-416
Michael	Childs, Jr.	michael.childsjr@piic.org	Prairie Island Indian Community	Prairie Island Indian Community 5636 Sturgeon Lake Road Welch, MN 55089	Electronic Service	No	OFF_SL_22-416_CN-22-416
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_22-416_CN-22-416
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_22-416_CN-22-416
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-416_CN-22-416
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416
Bill	Cook	bcCook@rpu.org	Rochester Public Utilities	4000 East River Road NE Rochester, MN 55906	Electronic Service	No	OFF_SL_22-416_CN-22-416
Sean	Copeland	seancopeland@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa	1720 Big Lake Rd Cloquet, MN 55720	Electronic Service	No	OFF_SL_22-416_CN-22-416
John	Crane	johncranefishing@gmail.com	Fishing	1250 Wee Gwaus DR SW Bemidji, MN 56601	Electronic Service	No	OFF_SL_22-416_CN-22-416
Hillary	Creurer	hcreurer@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_22-416_CN-22-416
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_22-416_CN-22-416
Rebecca	Crooks Stratton	Rebecca.Crooks-Stratton@ShakopeeDakota.org	Shakopee Mdewakanton Sioux Community	Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake, MN 55372	Electronic Service	No	OFF_SL_22-416_CN-22-416
Miyah	Danielson	MiyahDanielson@FDLREZ.COM	Fond du Lac Band of Lake Superior Chippewa	1720 Big Lake Road Cloquet, MN 55720	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Davis	atdavis1972@outlook.com	-	1161 50th Ave Sherburn, MN 56171	Electronic Service	No	OFF_SL_22-416_CN-22-416
Patricia	DeBleeckere	tricia.debleeckere@state.mn.us	Public Utilities Commission	121 7th Pl E St 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-416_CN-22-416
Jason	Decker	jason.decker@llojbwe.net	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-416_CN-22-416
Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa	PO Box 428 Grand Portage, MN 55605	Electronic Service	No	OFF_SL_22-416_CN-22-416
Randall	Doneen	randall.doneen@state.mn.us	Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul, MN 55155	Electronic Service	No	OFF_SL_22-416_CN-22-416
John E.	Drawz	jdrawz@fredlaw.com	Fredrikson & Byron, P.A.	Suite 4000 200 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_22-416_CN-22-416
Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa	Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake, MN 55772	Electronic Service	No	OFF_SL_22-416_CN-22-416
Wally	Dupuis	WallyDupuis@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa	1720 Big Lake Road Cloquet, MN 55720	Electronic Service	No	OFF_SL_22-416_CN-22-416
Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com	Fond du Lac Development Corp.	Reservation Business Committee 1720 Big Lake Rd Cloquet, MN 55720	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cory	Dutcher	cory.dutcher@ge.com	GE Power and Water	1 River Rd. Bldg. 37-413 Schenectady, NY 12345	Electronic Service	No	OFF_SL_22-416_CN-22-416
Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Oodena Drive Onamia, MN 56358	Electronic Service	No	OFF_SL_22-416_CN-22-416
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_22-416_CN-22-416
Scott	Ek	scott.ek@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-416_CN-22-416
Matthew	Ellis	mellis@GREnergy.com	Great River Energy	N/A	Electronic Service	No	OFF_SL_22-416_CN-22-416
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_22-416_CN-22-416
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_22-416_CN-22-416
Kyle	Fairbanks	kyle.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-416_CN-22-416
Michael	Fairbanks	Michael.Fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee	PO Box 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_22-416_CN-22-416
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_22-416_CN-22-416
Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_22-416_CN-22-416
Annie	Felix Gerth	annie.felix-gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_22-416_CN-22-416
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_22-416_CN-22-416
Kade	Ferris	kade.ferris@redlakenation.org	Red Lake Region	PO Box 274 Red Lake, MN 56671	Electronic Service	No	OFF_SL_22-416_CN-22-416
Leonard	Fineday	leonard.fineday@llojbwe.net	Leech Lake Bank of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-416_CN-22-416
Terri	Finn	terri.googleye@llojbwe.net	Leech Lake Band of Ojibwe	N/A	Electronic Service	No	OFF_SL_22-416_CN-22-416
Henry	Fox	henry.fox@whiteearth-nsn.gov	White Earth Nation	PO Box 418 White Earth, MN 56569	Electronic Service	No	OFF_SL_22-416_CN-22-416
Gary	Frazer	gfrazier@mnchippewatribe.org	Minnesota Chippewa Tribe	PO Box 217 Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-416_CN-22-416
Docketing	Fredlaw	docketing@fredlaw.com	Fredrickson & Byron	200 S 6th St, Suite 4000 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_22-416_CN-22-416
Mary Ann	Gagnon	maryanng@grandportage.com	Grand Portage Band of Ojibwe	PO Box 428 Grand Portage, MN 55605	Electronic Service	No	OFF_SL_22-416_CN-22-416
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_22-416_CN-22-416
Karen A	Gebhardt	kageb1@gvtel.com		43901 253rd Ave Leonard, MN 56652-4026	Electronic Service	No	OFF_SL_22-416_CN-22-416
Tara	Geshick	N/A	Bois Forte Band of Chippewa Tribal Government	5344 Lakeshore Drive Nett Lake, MN 55772	Paper Service	No	OFF_SL_22-416_CN-22-416
Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)	N/A	Electronic Service	No	OFF_SL_22-416_CN-22-416
Robbie	Goggleye	rgoggleye@boisforten.sn.gov	Bois Forte Band of Chippewa	Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake, MN 55772	Electronic Service	No	OFF_SL_22-416_CN-22-416
Todd	Green	Todd.A.Green@state.mn.us	Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_22-416_CN-22-416
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_22-416_CN-22-416
Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community	Upper Sioux Community PO Box 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Larry	Hartman	Larry.Hartman@state.mn.us	Department of Commerce	85 7th Place East, Suite 280 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-416_CN-22-416
Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community	5722 Travers Lane PO Box 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_22-416_CN-22-416
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_22-416_CN-22-416
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-416_CN-22-416
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_22-416_CN-22-416
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_22-416_CN-22-416
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-416_CN-22-416
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annie	Jackson	Cheryl.Jackson@whiteearth-nsn.gov	White Earth Nation	White Earth Tribal Headquarters 35500 Eagle View Road Ogemo, MN 56569	Electronic Service	No	OFF_SL_22-416_CN-22-416
Faron	Jackson, Sr.	faron.jackson@llojibwe.net	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-416_CN-22-416
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_22-416_CN-22-416
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_22-416_CN-22-416
Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community	PO Box 147 Granite Falls, MN 56241-0147	Electronic Service	No	OFF_SL_22-416_CN-22-416
Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd Welch, MN 55089	Electronic Service	No	OFF_SL_22-416_CN-22-416
Scott	Johnson	Scott.Johnson@ci.medina.mn.us	City of Medina	2052 County Road 24 Medina, MN 55340-9790	Electronic Service	No	OFF_SL_22-416_CN-22-416
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416
Johnny	Johnson	Johnny.Johnson@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Road Welch, MN 55089	Electronic Service	No	OFF_SL_22-416_CN-22-416
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Kaluzniak	mike.kaluzniak@state.mn.us	Public Utilities Commission	Suite 350 121 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-416_CN-22-416
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	OFF_SL_22-416_CN-22-416
Tom	Karas	tomskaras@gmail.com		3171 309th Ave NW Cambridge, MN 55008	Electronic Service	No	OFF_SL_22-416_CN-22-416
Terry	Kemper	Terry.Kemper@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Oodena Dr Onamia, MN 56359	Electronic Service	No	OFF_SL_22-416_CN-22-416
Bruce	King	Brenda@ranww.org	Realtors, Association of Northwestern WI	Suite 3 1903 Keith Street Eau Claire, WI 54701	Electronic Service	No	OFF_SL_22-416_CN-22-416
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-416_CN-22-416
Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers	180 5th St # 700 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_22-416_CN-22-416
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_22-416_CN-22-416
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_22-416_CN-22-416
Mike	Laroque	mike.laroque@whiteearthnsn.gov	White Earth Nation	PO Box 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_22-416_CN-22-416
Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community	PO Box 308 39527 Reservation Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-416_CN-22-416
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_22-416_CN-22-416
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416
Dan	Leshner	dlesher@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_22-416_CN-22-416
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_22-416_CN-22-416
Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_22-416_CN-22-416
Vernelle	Lussier	vernelle.lussier@redlakensation.org	Red Lake Nation	15484 Migizi Drive Red Lake, MN 56671	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_22-416_CN-22-416
Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service	Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington, MN 55425	Electronic Service	No	OFF_SL_22-416_CN-22-416
Shena	Matrious	Shena.Matrious@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Oodena Drive Onamia, MN 56349	Electronic Service	No	OFF_SL_22-416_CN-22-416
April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa	PO Box 428 Grand Portage, MN 55605	Electronic Service	No	OFF_SL_22-416_CN-22-416
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_22-416_CN-22-416
Valentina	Mgeni	Valentina.Mgeni@piic.org	Prairie Island Indian Community	Prairie Island Indian Community 5636 Sturgeon Lake Road Welch, MN 55089	Electronic Service	No	OFF_SL_22-416_CN-22-416
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_22-416_CN-22-416
Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community	Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake, MN 55372	Electronic Service	No	OFF_SL_22-416_CN-22-416
Allison	Mitchell	allisonmitchell@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa	1720 Big Lake Road Cloquet, MN 55720	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_22-416_CN-22-416
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416
Travis	Morrison	travis.morrison@boisforten-sn.gov	Bois Forte Band of Chippewa	Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake, MN 55772	Electronic Service	No	OFF_SL_22-416_CN-22-416
Robert	Moyer, Jr.	rmoyer@boisforte-n-sn.gov	Bois Forte Band of Chippewa Tribal Government	5344 Lakeshore Drive Nett Lake, MN 55772	Electronic Service	No	OFF_SL_22-416_CN-22-416
Colleen	Mueller	N/A		22186 State Hwy 4 Paynesville, MN 56362	Paper Service	No	OFF_SL_22-416_CN-22-416
Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority	4428 Haines Rd Duluth, MN 55811-1524	Electronic Service	No	OFF_SL_22-416_CN-22-416
Dan	Nelson	Dan.Nelson@ISGinc.com	I&S Group	115 E Hickory St Ste 300 Mankato, MN 56001	Electronic Service	No	OFF_SL_22-416_CN-22-416
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	OBrien	joey.obrien@lowersioux.com	Lower Sioux Indian Community	39527 Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-416_CN-22-416
Kevin	OKeefe	kevin.okeefe@lowersioux.com	Lower Sioux Indian Community	39527 Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-416_CN-22-416
Samantha J	Odegard	samanthao@uppersiouxcommunity-nsn.gov	Upper Sioux Tribal Community	PO Box 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_22-416_CN-22-416
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-416_CN-22-416
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_22-416_CN-22-416
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_22-416_CN-22-416
Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community	39527 Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-416_CN-22-416
Jennifer	Peterson	jipeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_22-416_CN-22-416
Kevin	Peterson	kjp@ibew160.org	IBEW Local 160	1109 Northway Lane NE Rochester, MN 55906	Electronic Service	No	OFF_SL_22-416_CN-22-416
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_22-416_CN-22-416

Appendix C

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Docket No. E015,ET2/TL-22-415

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Angela	Piner	angela.piner@hdrinc.com	HDR, Inc.	Suite 600 701 Xenia Avenue South Suite 600 Minneapolis, MN 55416	Electronic Service	No	OFF_SL_22-416_CN-22-416
Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation	15484 Migizi Drive Red Lake, MN 56671	Electronic Service	No	OFF_SL_22-416_CN-22-416
Robert	Prescott	robert.prescott@lowersioux.com	Lower Sioux Indian Community	39527 Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-416_CN-22-416
Larry	Rebman	larryemls@hotmail.com	EMLS, Inc	PO Box 122 Appleton, MN 56208	Electronic Service	No	OFF_SL_22-416_CN-22-416
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_22-416_CN-22-416
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_22-416_CN-22-416
Margaret	Rheude	Margaret_Rheude@fws.gov	U.S. Fish and Wildlife Service	Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington, MN 55425	Electronic Service	No	OFF_SL_22-416_CN-22-416
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_22-416_CN-22-416
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community	Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake, MN 55372	Electronic Service	No	OFF_SL_22-416_CN-22-416
Miranda	Sam	Miranda.Sam@lowersioux.com	Lower Sioux Indian Community	39527 Reservation Highway 1 PO Box 308 Morton, MN 56270	Electronic Service	No	OFF_SL_22-416_CN-22-416
Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community	5722 Travers Lane PO Box 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_22-416_CN-22-416
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_22-416_CN-22-416
Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd Welch, MN 55089	Electronic Service	No	OFF_SL_22-416_CN-22-416
Darrell	Seki, Sr.	dseki@redlakenation.org	Red Lake Nation	15484 Migizi Drive Red Lake, MN 56671	Electronic Service	No	OFF_SL_22-416_CN-22-416
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-416_CN-22-416
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Slukich	tom@nationalconductor.com	National Conductor Constructors	18119 Hwy 371 North Brainerd, MN 56401	Electronic Service	No	OFF_SL_22-416_CN-22-416
Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe	PO Box 217 Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-416_CN-22-416
Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community	PO Box 308 39527 Reservation Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-416_CN-22-416
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_22-416_CN-22-416
Roger	Smith, Sr.	RogerMSmithSr@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa	1720 Big Lake Road Cloquet, MN 55720	Electronic Service	No	OFF_SL_22-416_CN-22-416
Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy	10 Second Street NE Ste 400 Minneapolis, MN 55410	Electronic Service	No	OFF_SL_22-416_CN-22-416
Eugene	Sommers	eugene.sommers@whiteearth-nsn.gov	White Earth Nation	PO BOX 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_22-416_CN-22-416
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416
Marie	Spry	mariespry@grandportage.com	Grand Portage Band of Lake Superior Chippewa	PO Box 428 Grand Portage, MN 55605	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cheyanne	St. John	cheyanne.stjohn@lowersio ux.com	Lower Sioux Tribal Community	39527 Reservation Hwy 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-416_CN-22- 416
LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.ne t	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-416_CN-22- 416
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22- 416
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22- 416
Toby	Stephens	tobys@grandportage.com	Grand Portage Band of Lake Superior Chippewa	PO BOX 428 Grand Portage, MN 55605	Electronic Service	No	OFF_SL_22-416_CN-22- 416
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-416_CN-22- 416
Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_22-416_CN-22- 416
Carl	Strohm	cjsmg@sbcglobal.net	SBC Global	105 East Edgewood Ave Indianapolis, IN 46227	Electronic Service	No	OFF_SL_22-416_CN-22- 416
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22- 416
Samuel	Strong	Sam.strong@redlakenation .org	Red Lake Nation	15484 Migizi Drive Red Lake, MN 56671	Electronic Service	No	OFF_SL_22-416_CN-22- 416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Swafford	tswofford@umsi.us	Utility Mapping Services, Inc	3947 E Calvary Rd Suite 103 Duluth, MN 55803	Electronic Service	No	OFF_SL_22-416_CN-22-416
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_22-416_CN-22-416
Todd	Tadych	ttadych@atcllc.com	American Transmission Company LLC	5303 Fen Oak Dr Madison, WI 53718	Electronic Service	No	OFF_SL_22-416_CN-22-416
Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community	5722 Travers Lane PO BOX 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_22-416_CN-22-416
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-416_CN-22-416
Jayne	Trusty	execdir@swrdc.org	SWRDC	2401 Broadway Ave #1 Slayton, MN 56172	Electronic Service	No	OFF_SL_22-416_CN-22-416
Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community	Upper Sioux Community P.O. Box 147 Granite Falls, MN 55372	Electronic Service	No	OFF_SL_22-416_CN-22-416
Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency	Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago, IL 60604-3590	Electronic Service	No	OFF_SL_22-416_CN-22-416
Leonard	Wabasha	leonard.wabasha@shakopeedakota.org	Shakopee Mdewakanton Sioux Community	2300 Tiwahe Circle Shakopee, MN 55379	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416
Caren	Warner	caren.warner@state.mn.us	Department of Commerce	85 7th Place East Suite 280 St. Paul, MN 55101-2198	Electronic Service	No	OFF_SL_22-416_CN-22-416
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_22-416_CN-22-416
Elizabeth	Wefel	eawefel@flaherty-hood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_22-416_CN-22-416
Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd Welch, MN 55089	Electronic Service	No	OFF_SL_22-416_CN-22-416
Alan	Whipple	sa.property@state.mn.us	Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul, MN 551463340	Electronic Service	No	OFF_SL_22-416_CN-22-416
Steve	White	steve.white@llojbwe.net	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-416_CN-22-416
Noah	White	noah.white@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Road Welch, MN 55089	Electronic Service	No	OFF_SL_22-416_CN-22-416
Deanna	White	mncwa@cleanwater.org	Clean Water Action & Water Fund of MN	330 S 2nd Ave Ste 420 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-416_CN-22-416
Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Road Welch, MN 55089	Electronic Service	No	OFF_SL_22-416_CN-22-416

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_22-416_CN-22-416
Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Oodena Drive Onamia, MN 56359	Electronic Service	No	OFF_SL_22-416_CN-22-416
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury, MN 55125	Electronic Service	No	OFF_SL_22-416_CN-22-416
Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee	PO Box 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_22-416_CN-22-416
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_22-416_CN-22-416
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-416_CN-22-416