

Appendix E
Commission Order on Exemption Request and Notice Plan

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Application for a Certificate
of Need for the Iron Range – Benton County -
Big Oaks Transmission Project - Request for
Exemption

SERVICE DATE: June 21, 2023

DOCKET NO. E-015,ET-2/CN-22-416

The above entitled matter has been considered by the Commission and the following disposition made:

Approved the requested exemptions and the notice plan.

This decision is issued by the Commission’s consent calendar subcommittee, under a delegation of authority granted under Minn. Stat. § 216A.03, subd. 8 (a). Unless a party, a participant, or a Commissioner files an objection to this decision within ten days of receiving it, it will become the Order of the full Commission under Minn. Stat. § 216A.03, subd. 8 (b).

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order.

BY ORDER OF THE COMMISSION



Will Seuffert
Executive Secretary



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May 31, 2023

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

RE: **Supplemental Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015, ET2/CN-22-416

Dear Mr. Seuffert:

Based upon the May 16, 2023 reply comments and May 30, 2023 clarification filed by Minnesota Power and Great River Energy the Minnesota Department of Commerce, Division of Energy Resources recommends that the Minnesota Public Utilities Commission approve the requested exemptions and the notice plan and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ STEVE RAKOW
Analyst Coordinator

SR/ja

May 9, 2023

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015, ET2/CN-22-416

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

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.

The Petition was filed on April 19, 2023 by:

David Moeller
Minnesota Power
Senior Regulatory Counsel
30 West Superior Street
Duluth, MN 55802

Brian Meloy
Great River Energy
Associate General Counsel
12300 Elm Creek Boulevard
Maple Grove, MN 55369

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

Sincerely,

/s/ STEVE RAKOW
Analyst Coordinator

SR/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

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

I. INTRODUCTION

On April 19, 2023 Minnesota Power and Great River Energy (Applicants) submitted their *Request for Exemption from Certain Certificate of Need Application Data Requirements* (Exemption Petition). The Exemption Petition provided the Applicants' proposal to provide notice to all persons reasonably likely to be affected by the Minnesota portion of the Iron Range – Benton County – Big Oaks 345 kilovolt (kV) transmission line project (the Project).

Also on April 19, 2023 the Applicants filed their *Notice Plan Petition* (Notice Petition). The Notice Petition will be addressed in separate comments.

On April 27, 2023 the Minnesota Public Utilities Commission issued its *Notice of Comment Period on Request for Exemption from Certain Certificate of Need Filing Requirements* establishing due dates of May 9, 2023 and May 30, 2023 for comments and reply comments. The topic open for comment is "Should the Commission grant the exemptions to the certificate of need application content requirements as requested by Minnesota Power and Great River Energy in its filing on April 19, 2023?"

Below are the comments of the Minnesota Department of Commerce (Department) regarding the Exemption Petition

II. DEPARTMENT ANALYSIS

A. GOVERNING STATUTES AND RULES

The Applicants filed the Exemption Petition pursuant to Minnesota Rules, part 7849.0200 subpart 6 which states, in part:

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.

Based on this standard the Commission may grant exemptions when the data requirements are shown to be unnecessary to determine need or can be satisfied by submitting alternative information. In the

Exemption Petition the Applicants request to be exempted from certain data requirements of parts 7849.0010 to 7849.0400.

B. BACKGROUND

The Applicants propose to construct the Iron Range – Benton County – Big Oaks transmission line, which consists of the following elements:

- Segment 1, New Transmission—approximately 140-mile long, double-circuit 345 kV transmission line connecting the existing Iron Range substation, a new Riverton series compensation station, and the existing Benton County substation;
 - this segment is proposed to be generally located near existing transmission line corridors.
- Segment 2a, Replace Existing Transmission—replace the approximately 20-mile 230 kV line from the Benton County substation to a new Big Oaks substation with a double circuit 345 kV line;
 - this segment is proposed to use existing transmission line corridors.
- Segment 2b, Replace Existing Transmission—replace the approximately 20-mile 345 kV line from the Benton County substation to the Sherco substation with a double circuit 345 kV line;
 - this segment is proposed to use existing transmission line corridors.
- Improvement 1—expansion of the existing Iron Range and Benton County substations, and reconfiguring existing transmission lines at the Iron Range and Benton County substations.
- Improvement 2—construction of a new series compensation station at or near the existing Riverton substation and reconfiguring existing transmission lines in the Riverton area (collectively, Project).

The proposed Project was studied, reviewed, and approved as part of the Long Range Transmission Planning (LRTP) Tranche 1 portfolio by the Midcontinent Independent System Operator, Inc.'s (MISO) Board of Directors in July 2022 as part of the *2021 MISO Transmission Expansion Plan*.

C. REQUESTED EXEMPTIONS

The Exemption Petition requests exemptions from the following requirements:

- 7849.0260 subparts A (3) and C (6)—line-specific loss information;
- 7849.0270—peak demand and annual consumption forecast; system revenue requirements;
- 7849.0280—system capacity;
- 7849.0290—conservation;
- 7849.0300—consequences of delay; and
- 7849.0340—no facility alternative.

The Department examines each specific exemption request separately. The required criterion is whether the Applicants have shown that “the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document” as discussed above.

D. ANALYSIS OF EXEMPTION REQUESTS

1. 7849.0260 subparts A (3) and C (6)

Minnesota Rules 7849.0260, subparts A (3) and C (6) require an applicant for a CN to provide estimated “losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations.” The Exemption Petition explains that:

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.

The Applicants request an exemption from Minnesota Rules 7849.0260, subps. A (3) and C (6) and propose to provide system losses in lieu of line-specific losses required by the rules. The Department agrees that line losses for the system are more relevant to the analysis than line losses for individual lines. Also, as indicated in the Exemption Petition the proposal is consistent with the approach previously approved by the Commission in several other transmission line CN dockets. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0260, subpart A (3) and C (6) with the provision of the proposed alternative data.

2. 7849.0270

i. Subp. 1 – Peak Demand and Annual Consumption Data

Minnesota Rules 7849.0270, subp. 1 requires information concerning peak demand and annual consumption for the entire service area and system of the applicant. Because the proposed Project is intended to support a broad geographic region, including the entirety of the Applicants’ service areas, the Applicants propose to provide substitute data in the form of:

- Minnesota Power’s and Great River Energy’s most recent Annual Forecast Report (AFR); and
- any forecast information used in analyzing the need for the proposed Project.

The Department agrees that the AFRs will include reasonable forecasting information for the Applicants’ systems. In addition, using forecast information actually used in analyzing the need for the proposed Project is superior to using the information required by the rule. Therefore, the Department

recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0270, subpart 1 with the provision of the proposed alternative data.

ii. Subps. 2 (A) and 2 (B) – Customer Annual Consumption Data

Minnesota Rules 7849.0270, subps. 2 (A) and 2 (B) requires an applicant to estimate the number of customers and the amount of energy consumed annually. The Applicants state that energy consumption data is not relevant to establishing the need for a proposed transmission line. Instead, transmission systems “must be sized so that they have sufficient capacity to operate reliably during periods of peak demand.” The Applicants propose to provide substitute data in the form of the AFRs and any other forecast information used in analyzing the need for the proposed Project.

Again, the Department agrees that the AFRs will include reasonable forecasting information for the Applicants’ systems and that using forecast information used in analyzing the need for the proposed Project is superior to using the information required by the rule. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0270, subps. 2 (A) and 2 (B) with the provision of the proposed alternative data.

iii. Subps. 2 (C) and 2 (D) – System Demand and Peak Demand

Minnesota Rules 7849.0270, subps. 2 (C) and 2 (D) requires an applicant estimate of the system peak demand by customer class and historic monthly system peak demand data. Instead, the 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 proposed Project.

The Department agrees that the AFRs will include reasonable forecasting information for the Applicants’ systems. In addition, using forecast information used by MISO and the Applicants in analyzing the need for the proposed Project is superior to using the information required by the rule. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0270, subps. 2 (C) and 2 (D) with the provision of the proposed alternative data.

iv. Subp. 2 (E) – System Revenue Requirements

Minnesota Rules 7849.0270, subp. 2 (E) requires an applicant provide estimated annual revenue requirement per kilowatt hour for the system in current dollars. Instead of the required data Minnesota Power proposes to provide the general rate impact of the proposed 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 effects of the proposed Project on Great River Energy’s member cooperatives.

The Department agrees that providing information regarding how the costs for LRTP projects are actually allocated across the MISO footprint and impact ratepayers and member cooperatives is superior to using the information required by the rule. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0270, subpart 2 (E) with the provision of the proposed alternative data.

v. Subp. 2 (F) – Weekday Load Factor

Minnesota Rules 7849.0270, subp. 2 (F) requires an applicant provide estimated average system weekday load factor by month. The Applicants request an exemption from this requirement because load factor is not a relevant consideration when evaluating the need for a transmission facility. Specifically, the Applicants state that “Load factor is a measure of how demand varies over time and is relevant to the need determination for new generation.” Thus, the Applicants request an exemption from this requirement.

The Department agrees that providing information regarding load factor is unlikely to be of importance for analysis of the proposed Project. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0270, subpart 2 (F).

vi. Subps. 3 to 6 – Forecast Methodology, Data Base, Assumptions, and Coordination of Forecasts

Minnesota Rules 7849.0270, subps. 3 to 6 require an applicant to detail the forecast methodology employed, identify the database used for the forecast, detail the assumptions made in preparing the forecasts, and a description of load forecast coordination efforts with other systems. As cited above, the Applicants state that the need for the proposed Project is not prompted by energy consumption, but rather by demand during peak times. Thus, the Applicants believe that forecast information and a discussion of the different regional demand scenarios evaluated in the analysis used by the Applicants and MISO to justify the proposed Project will better enable the Commission to evaluate the need. Instead of providing the required information, the Applicants again point to the AFRs as providing relevant forecasting information on the Applicants and the forecast information used by MISO to justify the proposed Project.

The Department agrees that providing information regarding how the Applicants and MISO analyzed the need for the LRTP projects is superior to using the information required by the rule. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0270, subps. 3 to 6 with the provision of the proposed alternative data (the AFRs and the forecast data used by MISO).

3. 7849.0280

Minnesota Rules 7849.0280 requires an applicant for a CN to provide information that describes the ability of its existing system to meet forecasted demand; in essence, load and capability information. The Applicants state that subparts (B) through (I) pertain to an examination of generation adequacy and do not address transmission planning considerations. Therefore, the Applicants request that the Commission grant an exemption from Minnesota Rules 7849.0280, subps. (B) through (I) and an exemption with alternative data from the Applicants' AFRs provided for Minnesota Rules 7849.0280, subp. (A).

The Department agrees with the Applicants that the Commission has previously granted exemption requests from Minnesota Rules 7849.0280, subps. (B) through (I) in several other transmission line CN dockets where, as here, the issue relates to transmission adequacy rather than generation adequacy. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0280, subps. (B) through (I) and approve use of the Applicants' AFRs as substitute information for Minnesota Rules 7849.0280, subp. (A).

4. 7849.0290

Minnesota Rules 7849.0290 requires an applicant for a CN to provide conservation program information and quantification of the impact of conservation programs on forecast data. The Applicants state that conservation and efficiency information is examined in detail in the resource planning process. All of the information requested by this rule is contained in Integrated Resource Plan and Conservation Improvement Plan filings filed by the Applicants. Instead of replicating that information in this application, Applicants propose to present a summary of the relevant filings.

The Department agrees that the proposed summary information, will provide a reasonable starting point for analysis of the Applicants' conservation programs and their impact on the need for the proposed Project. In addition, the Department recommends the Applicants be required to explain how MISO considered energy efficiency in determining the need for the proposed Project. This information will better inform the record as to the need for the proposed Project than the required information. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0290 with the provision of the proposed alternative data and also provision of information that explains how MISO considered energy efficiency.

5. 7849.0300

Minnesota Rules 7849.0300 requires an applicant for a CN to provide detailed information regarding the consequences of delay on three specific, statistically-based levels of demand and energy consumption. The Applicants state that they will discuss the consequences of delay and in the CN application, but there is no need to discuss these items at three levels of demand. The relevant inquiry is whether the system can meet peak demand and other system power flow circumstances. The

Applicants also note that the Commission has approved similar partial exemption requests from the requirements of Minn. R. 7849.0300 and 7849.0340 in other transmission line CN dockets.

The Department agrees with the Applicants that information on the consequences of delay tied to three specific statistically-based levels of demand and energy consumption is not likely to be a critical part of the analysis for the proposed Project and that a general discussion is appropriate. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0300 with the provision of the proposed alternative data.

6. 7849.0340

Minnesota Rules 7849.0340 requires an applicant for a CN provide a discussion of the impact on existing generation and transmission facilities at the three levels of demand specified in part 7849.0300 for the no-build alternative. As with Minnesota Rules 7849.0300, the Applicants state that “such a discussion is an important element of a determination of the need for new transmission infrastructure.” However, while the Applicants will evaluate a no build alternative, the Applicants request a variance from the portions of these rules that require the examination to incorporate the three specific levels of demand.

The Department agrees with the Applicants that information on the consequences of a no-build alternative tied to three specific statistically-based levels of demand and energy consumption is not likely to be a critical part of the analysis for the proposed Project and that a general discussion is appropriate. Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0340.

III. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission grant the requested exemption to:

1. Minnesota Rules 7849.0260 subpart A (3) and C (6) with the provision of the proposed alternative data;
 - a. data on system losses.
2. Minnesota Rules 7849.0270 subp. 1, subps. 2 (A) to 2 (D), subp. 2 (F), and subps. 3 to 6 with the provision of the proposed alternative data;
 - a. the Applicants’ most recent AFRs and any forecast information used by the Applicants or MISO in analyzing the need for the proposed Project.
3. Minnesota Rules 7849.0270 subps. 2 (E) with the provision of the proposed alternative data;
 - a. Minnesota Power—the rate impact on Minnesota Power’s customers.
 - b. Great River Energy—an explanation of how wholesale electricity costs are spread among users of the transmission grid and the general financial effects of the proposed Project on Great River Energy’s member cooperatives.

4. Minnesota Rules 7849.0280 with the provision of the proposed alternative data;
 - a. the Applicants' most recent AFRs.
5. Minnesota Rules 7849.0290 with the provision of the proposed alternative data and additional data recommended by the Department;
 - a. Applicants' proposal—present a summary of the relevant filings regarding conservation;
 - b. Department addition—provide information explaining how MISO considered energy efficiency.
6. Minnesota Rules 7849.0300 with the provision of the proposed alternative data;
 - a. general discussion of the consequences of delay.
7. Minnesota Rules 7849.0340 with the provision of the proposed alternative data;
 - a. general discussion of the no-build alternative.

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 Number: **E-015,ET-2/CN-22-416**

Dated this **21st** day of **June, 2023**

/s/ Robin Benson

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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
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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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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.goggleye@llojbwe.net	Leech Lake Band of Ojibwe	N/A	Electronic Service	No	OFF_SL_22-416_CN-22-416
Henry	Fox	henry.fox@whiteearthnsn.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
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
Robbie	Goggleye	rgoggleye@boisfortensn.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
Ashley	Harrison	ashley.harrison@llojibwet.net	Leech Lake Band of Ojibwe	190 Sailstar Dr NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-416_CN-22-416
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_22-416_CN-22-416
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
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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
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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
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Carol A.	Overland	overland@legalectric.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	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_22-416_CN-22-416
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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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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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
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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

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