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by Sidney Davy Miller

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April 25, 2023

Ms. Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
Lansing, MI 48917

Re: Northern States Power Company
2022 RE Reconciliation
Case No. U-21355

Dear Ms. Felice:

Enclosed for electronic filing are the Application and Direct Testimony and Exhibit of Benjamin G. Kaldunski. Also enclosed is my Appearance.

Should you have any questions, please kindly advise.

Sincerely,

Miller, Canfield, Paddock and Stone, P.L.C.

By: _____
Sherri A. Wellman

SAW/ehk
Enclosures
cc w/enc: Benjamin G. Kaldunski
Michelle Schlosser
Mara K. Ascherman

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * *

In the matter of the application of)
NORTHERN STATES POWER COMPANY-)
WISCONSIN to commence a renewable energy) Case No. U-21355
cost reconciliation proceeding for the 12-month)
period ended December 31, 2022.)

APPLICATION

Northern States Power Company, a Wisconsin corporation (“NSP-W” or the “Company”) requests the Michigan Public Service Commission (“Commission”) to approve the Company’s 2022 Renewable Energy Annual Report (“Report”) and the reconciliation of its renewable cost pursuant to MCL 460.1049. In support thereof, the Company respectfully represents as follows:

1. NSP-W is a public service corporation organized under the laws of Wisconsin with its principal offices located in Eau Claire, Wisconsin, and is engaged primarily in public utility operations. NSP-W is also authorized to do business in Michigan and provides retail electric service to the public in service areas located in Michigan.

2. By Order, dated July 24, 2018, in Case No. U-18234, the Commission approved the Company’s renewable energy plan and, as of the date of this application, the approved plan has not been amended and therefore relates to this 2022 reconciled period. As approved, the renewable energy plan provides for meeting renewable energy standards through existing power supply resources, with the costs thereof to be addressed and

accounted for through base rates and Power Supply Cost Recovery (“PSCR”) proceedings, without a separate renewable energy surcharge.

3. By order dated February 2, 2023, the Commission established a filing deadline of April 30, 2023, for NSP-W’s renewable energy reconciliation for the 2022 period.

4. NSP-W’s actions with regards to renewable energy (i) comply with the renewable energy standards applicable to 2022, (ii) are consistent with NSP-W’s then existing renewable energy plan, as approved in Case No. U-18234, and (iii) are reasonable and prudent.

5. NSP-W’s approved renewable energy plan does not include any renewable energy surcharge. Thus, there are no renewable energy surcharge revenues to be reconciled. Further, NSP-W is not seeking pursuant to MCL 460.1049(2) a modification of its renewable energy cost recovery mechanism.

6. NSP-W’s 2022 Renewable Energy Annual Report is filed herewith as Exhibit A-1 (BGK-1) to the prefiled direct testimony of Benjamin G. Kaldunski, which is filed contemporaneously herewith and in support of hereof.

WHEREFORE, Northern States Power Company – Wisconsin requests that this Commission:

- A. Find and determine that NSP-W’s 2022 Renewable Energy Annual Report satisfies all applicable requirements;
- B. Find and determine that NSP-W’s actions in 2022 complied with renewable energy standards, and were reasonable and prudent;

- C. Find NSP-W's reconciliation of renewable energy revenues and incremental costs of compliance for 2022 do not result in any under-recovery or over-recovery of costs as the costs are addressed and accounted for through base rates and the Company's PSCR proceedings, without a separate renewable energy surcharge;
- D. Reaffirm NSP-W's existing cost recovery mechanism; and
- E. Grant such other relief as is just and reasonable.

Respectfully submitted,

NORTHERN STATES POWER COMPANY,
A WISCONSIN CORPORATION

Dated: April 25, 2023

By: _____
Its Attorney
Sherri A. Wellman (P38989)
MILLER, CANFIELD, PADDOCK, AND STONE, P.L.C.
One Michigan Avenue, Suite 900
Lansing, MI 48933
(517) 487-2070

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STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * *

In the matter of the application of)
NORTHERN STATES POWER COMPANY –)
WISCONSIN to commence a renewable energy)
cost reconciliation proceeding for the 12-month)
period ended December 31, 2022.)

Case No. U-21355

DIRECT TESTIMONY AND EXHIBIT OF BENJAMIN G. KALDUNSKI

Dated: April 25, 2023

DIRECT TESTIMONY AND EXHIBIT
OF BENJAMIN G. KALDUNSKI

1 **Q. Please state your name and business address.**

2 A. My name is Benjamin G. Kaldunski. My business address is 10 West Doty Street, Madison,
3 Wisconsin 53703.

4

5 **Q. By whom are you employed and in what capacity?**

6 A. I am an Energy and Environmental Policy Analyst with the Regulatory Affairs
7 Department of Northern States Power Company, a Wisconsin corporation (“NSP-W” or
8 the “Company”) and wholly owned subsidiary of Xcel Energy Inc. (“Xcel Energy”).

9

10 **Q. Please briefly state the duties of your present position.**

11 A. I am responsible for policy analysis and other regulatory administration functions for the
12 retail electric and natural gas utilities of NSP-W in Wisconsin and Michigan.

13

14 **Q. What is your educational and professional background?**

15 A. I have a Bachelor of Arts degree in Journalism and International Studies from the University
16 of Minnesota-Twin Cities, along with a Master of Science in Energy Analysis and Policy
17 from the University of Wisconsin-Madison, Nelson Institute. Prior to joining NSP-W, I
18 worked for 2.5 years as a public utility rates and policy analyst for the Public Service
19 Commission of Wisconsin, Division of Energy Regulation and Analysis. I have over 9 years
20 of experience in the energy industry including non-profit research with the Electric Power
21 Research Institute in Palo Alto, California, distributed energy resource consulting with
22 Hitachi Americas’ Energy Solutions Division, the U.S. Environmental Protection Agency’s

DIRECT TESTIMONY AND EXHIBIT
OF BENJAMIN G. KALDUNSKI

1 Office of Research and Development, and energy policy reporting for Argus Media in
2 Washington, D.C. I began my career at Xcel Energy in April 2022 when I joined NSP-W's
3 Regulatory Affairs Department.

4

5 **Q. Have you previously testified before, or filed testimony with, state regulatory**
6 **agencies?**

7 A. Yes. I have previously filed testimony with the Public Service Commission of Wisconsin
8 while serving as a public utility rates analyst from November 2019 to March 2022. I have
9 also provided testimony to the Michigan Public Service Commission ("MPSC" or the
10 "Commission") in Case No. U-21200 regarding NSP-W's 2021 renewable energy cost
11 reconciliation and annual report.

12

13

PURPOSE OF TESTIMONY

14 **Q. What is the purpose of your testimony?**

15 A. The Commission Order in Case No. U-21355 dated February 2, 2023 requires NSP-W to
16 file its Renewable Energy ("RE") annual report ("Report") and reconciliation for 2022 by
17 April 30, 2023. My testimony describes the Company's Report, the existing cost
18 recovery mechanism; and supports the relief requested in the Company's 2022 RE
19 reconciliation filing.

20

21 **Q. Are you sponsoring any exhibits with this testimony?**

22 A. Yes. I am sponsoring one exhibit, Exhibit A-1 (BGK - 1), which is NSP-W's 2022
23 Renewable Energy Annual Report.

DIRECT TESTIMONY AND EXHIBIT
OF BENJAMIN G. KALDUNSKI

1 **Q. Did you prepare this exhibit or cause to have the exhibit prepared under your**
2 **direction and supervision?**

3 A. Yes.
4

5 **Q. Is NSP-W proposing any changes to its existing RE plan?**

6 A. Not in this case. The Company believes the final order in Case No. U-18234 dated July
7 24, 2018, remains appropriate for this Report and reconciliation. The Company's
8 renewable energy plan filed January 30, 2018 in Case No. U-18234 accurately reflects its
9 renewable energy plan going forward. The Company is not proposing any changes to the
10 cost recovery mechanism or the Company's existing tariff in this docket, nor is it
11 proposing changes to the cost recovery mechanism or tariff in Case No. U-18234.
12

13 **Q. Were NSP-W's actions and decisions in 2022 implementing its existing RE plan**
14 **reasonable and prudent?**

15 A. Yes.
16

17 **Q. Were any new qualifying RE facilities constructed in 2022?**

18 A. Yes. For details, see Exhibit A-1, NSP-W's response to Section 51(2)(d) in the
19 Company's Renewable Energy Annual Report.
20

21 **Q. Did NSP-W recover any RE cost through a RE surcharge in 2022?**

22 A. No. All of NSP-W's costs for its RE are included in its base rates or in rates that are
23 adjusted as part of the Power Supply Cost Recovery proceedings.

DIRECT TESTIMONY AND EXHIBIT
OF BENJAMIN G. KALDUNSKI

1 **Q. Does NSP-W plan to change its method for recovering its RE costs?**

2 A. No.

3

4 **Q. What method does NSP-W use to determine its annual retail sales for the Michigan**
5 **jurisdiction?**

6 A. NSP-W uses the three-year rolling average to determine its annual retail sales.

7

8 **Q. Is NSP-W banking RE credits for future use in Michigan?**

9 A. Yes.

10

11 **Q. Did NSP-W use any energy waste reduction credits or any other incentive credits in**
12 **2022?**

13 A. No.

14

15 **Q. What was NSP-W's available renewable energy for its Michigan retail customers in**
16 **2022?**

17 A. This value totals 59,857 RE Credits, well above the Company's compliance requirement.

18 This is the amount of renewable energy available to Michigan retail customers, with a

19 small portion of that being used for our voluntary green pricing program. On May 8,

20 2020, the Commission issued an order in Case No. U-20638 approving NSP-W's

21 proposal to offer a new voluntary green pricing program, Renewable*Connect[®], and to

22 automatically convert all Windsource[®] customers to Renewable*Connect[®] with an

23 opportunity for customers to opt out of the conversion. NSPW began offering

DIRECT TESTIMONY AND EXHIBIT
OF BENJAMIN G. KALDUNSKI

1 Renewable*Connect[®] to customers July 1, 2020. All Windsource customers have been
2 transitioned to Renewable*Connect.

3

4 **Q. Is NSP-W in compliance with the renewable energy standards applicable to 2022?**

5 A. Yes.

6

7 **Q. Does this conclude your direct testimony at this time?**

8 A. Yes.

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EXHIBIT A-1 (BGK-1)
MPSC Case No. U-21355
Witness: Benjamin G. Kaldunski

Renewable Energy Annual Report
Revised February 2023

Electric Provider:

Reporting Period: Calendar Year 2022

- The purpose of this annual report is to provide information regarding activities that occurred within calendar year 2022.
- Many of the requested figures are available from MIRECS reports; names of which are noted within this template. If your figures agree with those within MIRECS, you may submit the MIRECS report as an attachment to this annual report. If your figures differ from those within MIRECS, please explain any discrepancies. Staff from the MPSC and MIRECS Administrator, APX, Inc., are available to help reconcile.

Section 51(2)(c).

Within this section, list each renewable energy system (RES) owned, operated or controlled by the electric provider. List the capacity of each system, the amount of electricity generated by each system and the percentage of electricity which was generated from renewable energy (RE).

System Name ¹	System Type (RES)	Nameplate Capacity (MW)	Electricity Generated (MWh)	% of Electricity generated by RE/ACE
See Attachments III and IV				

¹System name should agree with the project name listed within MIRECS. This data may be found in the Project Management module within MIRECS.

Within this section, list the renewable energy system (RES) the electric provider is purchasing energy credits from. These include purchase power agreements. However, unbundled (credit only) purchases do not need to be listed here. Projects (generators) serving multijurisdictional electric providers should be listed here.

System Name	System Type (RES)	Electricity Purchased (MWh)	Energy Credits Purchased ¹	Allocation Factor and Method
See Attachments III and IV				

¹Distinguish between different types of credits (REC).

Allocation Factor and Method: For use if 100% of system output is not purchased. For instance, a system selling to multiple parties: list how the energy and credits are allocated – if by percentage, list the percentage as well.

Allocation Factor and Method: If used by multijurisdictional electric providers please include which percentage of energy and credits are to be distributed to Michigan (list allocation method as well, for example: system load).

Section 51(2)(f).

Within this section, list the method and the retail sales in MWh for the reporting period.

List the Method: either average of 2019-2021 retail sales or the 2021 weather normalized retail sales.

Average of 2019-2021 retail sales

The method chosen should be consistent with the method approved in the initial plan case from 2017. All sales are retail (net of wholesale).

(A) List the sales in MWh based on the method selected above. Please show the calculation of this figure (including listing the sales of each year if the three-year average method is used).

136,549 - See Attachment II

(B) 15% RPS Portfolio: List the energy credits used for the 15% RPS portfolio for the 2022 compliance year. This number should agree with the compliance requirement listed in the 2022 compliance subaccount in MIRECS. Take into account any energy waste reduction substitutions and limits on their use.

20,482 – See Attachment I

Calculate the renewable energy percentage. Figure above divided by sales in MWh above (B divided by A).

15% – See Attachment I

Attachment I.

NSP Renewable Energy Compliance Calculation

As approved in U-16585

Number of RECs, one year prior to Act (October 2007-September 2008) that would have been transferred under 35(1) PURPA Provision, if Act in effect at time	0
Number of RECs generated one year prior to Act (January 2008 - December 2008) (if recoverable in rates)	2,600
Number of RECs purchased one year prior to Act (January 2008 - December 2008) (if recoverable in rates)	<u>10,079</u>
(Baseline) RECs prior to Act	12,679
	<u>2022</u>
*Projected Retail Sales (MWh)	
Previous 3-year average method	136,549
15% REC Requirement	20,482
Less: (Baseline) RECs prior to Act	<u>12,679</u>
Additional RECs needed for compliance	7,803
Add: 2022 (100% of RECs needed for 10% compliance)	0
2022 Compliance Requirement (RECs)	<u>20,482</u>

Compliance Renewable Energy % for Reporting Period	15.00%
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Notes:

(1) Incentive RECs were not included in the calculation of the RECs baseline

(2) New MI Law states " In 2016 and each year thereafter, maintain a renewable energy credit portfolio that consists of at least the same number of renewable energy credits as were required in 2015 under subdivision".

Attachment II.
Wisconsin Energy Requirements and Retail Sales

	2022
Wisconsin Co. Net Energy Requirements	7,137,678
NSP System NetEnergy Requirements	41,932,529
Wisconsin Co. Percent of NSP System	17.0218%
<hr/>	
Wisconsin Co. Gross Energy Requirements	7,275,929
Wisconsin Co. Wholesale Sales	0
Wisconsin Co. Wholesale Allocation Percent	0
<hr/>	
Wisconsin Co. Percent of NSP RECs Available for Compliance	17.0218%
<hr/>	
Michigan Percentage of Wisconsin Co.	1.9909%
<hr/>	
2019 Michigan Forecast Retail Sales	139,243
2020 Michigan Forecast Retail Sales	132,502
2021 Michigan Forecast Retail Sales	137,900
2019 - 2021 Average Retail Sales	136,549
<hr/>	
2022 RECs Available (see Attachment IV, includes Green Pricing RECs)	59,857
<hr/>	
Estimated Available Renewable Energy % for Reporting Period	43.84%

**Attachment III
 Generator Nameplate Capacity and Percentage Generated from Renewable Energy**

Purchased Wind	Type	State	Generator Nameplate Capacity (MW)	Percentage Generated from Renewable Energy
Adams Wind	Wind	MN	19.80	100%
Agassiz	Wind	MN	1.98	100%
Big Blue Wind Farm	Wind	MN	36.00	100%
Blazing Star I	Wind	MN	200.00	100%
Boeve	Wind	MN	1.90	100%
Carlton College	Wind	MN	1.65	100%
Chanarambic PP	Wind	MN	85.50	100%
Cisco	Wind	MN	8.00	100%
Crowned Ridge Wind, LLC	Wind	SD	200.10	100%
Dakota Range III Wind	Wind	SD	153.30	100%
Danielson Wind	Wind	MN	19.80	100%
East Ridge	Wind	MN	10.00	100%
Ewington	Wind	MN	19.95	100%
Fenton Power Partners I & II	Wind	MN	205.50	100%
Fey Windfarm	Wind	MN	1.90	100%
FPL Mower County	Wind	MN	98.90	100%
Garwin McNeilus Windfarm	Wind	MN	36.75	100%
Glen Ullin Energy Center	Wind	ND	106.08	100%
Grant County	Wind	MN	20.00	100%
Hilltop	Wind	MN	2.00	100%
Jeffers	Wind	MN	50.00	100%
JJN Windfarm	Wind	MN	1.50	100%
K-Brink Windfarm	Wind	MN	1.90	100%
KAS Brothers	Wind	MN	1.50	100%
Lake Benton PP	Wind	MN	100.30	100%
Metro	Wind	MN	0.66	100%
MinnDakota	Wind	MN/SD	249.00	100%
Moraine II	Wind	MN	49.50	100%
Norgaard North	Wind	MN	5.00	100%
Norgaard South	Wind	MN	3.75	100%
North Community Turbines	Wind	MN	15.00	100%
North Wind Turbines	Wind	MN	15.00	100%
North Shaokotan	Wind	MN	11.88	100%
Odell Wind Farm	Wind	MN	200.00	100%
Olsen	Wind	MN	1.50	100%
Pipestone	Wind	MN	8.25	100%
Prairie Rose	Wind	MN	200.00	100%
Ridgewind	Wind	MN	26.00	100%
Rock Aetna Pwr Partners	Wind	MN	27.00	200%
Rock Ridge	Wind	MN	1.80	100%
Ruthon Ridge	Wind	MN	15.84	100%
Shane	Wind	MN	2.00	100%
Southridge	Wind	MN	1.80	100%
St Olaf	Wind	MN	1.65	100%
Tholen	Wind	MN	13.20	100%
Uilk	Wind	MN	4.50	100%
Valley View	Wind	MN	10.00	100%
Velva	Wind	ND	11.88	100%
Westridge Windfarm	Wind	MN	9.50	100%
Windcurrent Farms	Wind	MN	1.90	100%
Windvest	Wind	MN	1.80	100%
Winona	Wind	MN	1.50	100%
Woodstock Hills, LLC	Wind	MN	9.20	100%
Woodstock Municipal	Wind	MN	0.75	100%
Zephyr Wind	Wind	MN	30.75	100%
Deuel Harvest Wind Energy LLC	Wind	SD	301.40	100%
Heartland Divide	Wind	IA	200.00	100%
Elk Creek Solar Replacement	Wind		80.00	100%
Total Purchased Wind			2,896.32	

**Attachment III
 Generator Nameplate Capacity and Percentage Generated from Renewable Energy**

Purchased Solar	Type	State	Generator Nameplate Capacity (MW DC)	Percentage Generated from Renewable Energy
PSWIF1, LLC Eau Claire	Solar	WI	0.80	100%
OE WI Solar 1 (Endicott)	Solar	WI	0.70	100%
OE WI Solar 2 (Ore Dock)	Solar	WI	0.70	100%
Aurora Solar Projects	Solar	MN	100.00	100%
North Star Solar	Solar	MN	100.00	100%
Marshall Solar	Solar	MN	62.25	100%
School Sisters of Notre Dame Solar Park	Solar	MN	0.72	100%
Slayton Solar	Solar	MN	1.67	100%
St. John's Solar	Solar	MN	0.50	100%
DragonFly Solar	Solar	MN	0.79	100%
1000 University Properties LP	Solar	MN	0.03	100%
Blue Lake Wastewater Treatment	Solar	MN	1.25	100%
CHS Field Solar Arrays	Solar	MN	0.10	100%
Court International LLC	Solar	MN	0.34	100%
DNR Solar	Solar	MN	0.11	100%
East Phillips Park Cultural & Community C	Solar	MN	0.01	100%
freEner-g 2009 Group	Solar	MN	0.01	100%
freEner-g 2010 Group	Solar	MN	0.20	100%
Hutchinson Wastewater Treatment	Solar	MN	0.40	100%
MCC Solar	Solar	MN	0.46	100%
Merrick Solar	Solar	MN	0.07	100%
Minneapolis /St. Paul International Airport	Solar	MN	1.07	100%
Nokomis Main Beach - Nokomis	Solar	MN	0.01	100%
Parade Ice Garden	Solar	MN	0.15	100%
Rev. Dr. Martin Luther King, Jr. Recreation	Solar	MN	0.01	100%
Target Midway Store	Solar	MN	0.38	100%
UEL Real Estate Holdings LLC	Solar	MN	0.30	100%
University Centre @ 1919	Solar	MN	0.09	100%
Webber Park - Webber	Solar	MN	0.00	100%
Edison Gym	Solar	MN	0.22	100%
Edison High School	Solar	MN	0.23	100%
Total Purchased Solar			273.58	

Purchased Hydro	Type	State	Generator Nameplate Capacity (MW)	Percentage Generated from Renewable Energy
SAF Hydro	Hydro	MN	9.20	100%
Western Technical College	Hydro	WI	0.21	100%
Total Purchased Hydro			9.41	

Purchased Wood	Type	State	Generator Nameplate Capacity (MW)	Percentage Generated from Renewable Energy
St. Paul Cogen	Wood	MN	25.00	100%
Total Purchased Wood			25.00	

Purchased Biogas	Type	State	Generator Nameplate Capacity (MW)	Percentage Generated from Renewable Energy
GL Bio Gas I	Biogas	WI	1.14	100%
Green Whey Energy	Biogas	WI	3.20	100%
Total Purchased Biogas			4.34	

Total Purchased Renewables			3,209	
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Attachment III
Generator Nameplate Capacity and Percentage Generated from Renewable Energy

Owned Wind	Type	State	Generator Nameplate Capacity (MW)	Percentage Generated from Renewable Energy
Blazing Star II Wind	Wind	MN	200.00	100%
Crowned Ridge II Wind	Wind	SD	200.00	100%
Courtenay Wind Farm	Wind	ND	200.00	100%
Border Winds Wind Farm	Wind	ND	150.00	100%
Dakota Range I & II	Wind	SD	300.00	100%
Foxtail Wind	Wind	ND	150.00	100%
Freeborn Wind Farm	Wind	MN	200.00	100%
Grand Meadow	Wind	MN	100.50	100%
Nobles Wind Farm	Wind	MN	201.00	100%
Pleasant Valley Wind Farm	Wind	MN	200.00	100%
Total Owned Wind			1,902	

Owned Hydropower	Type	State	Generator Nameplate Capacity (MW)	Percentage Generated from Renewable Energy
Apple River	Hydro	WI	3.30	100%
Big Falls	Hydro	WI	7.78	100%
Cedar Falls	Hydro	WI	6.00	100%
Chippewa Falls	Hydro	WI	21.60	100%
Cornell	Hydro	WI	35.30	100%
Eau Claire Dells	Hydro	WI	9.50	100%
Hayward	Hydro	WI	0.20	100%
Hennepin Island/St. Anthony Falls	Hydro	MN	13.50	100%
Holcombe	Hydro	WI	33.90	100%
Jim Falls	Hydro	WI	59.80	100%
Ladysmith	Hydro	WI	3.40	100%
Menomonie	Hydro	WI	5.40	100%
Riverdale	Hydro	WI	0.60	100%
Saxon Falls	Hydro	WI/MI	1.60	100%
St Croix	Hydro	WI	23.20	100%
Superior Falls	Hydro	WI/MI	1.90	100%
Thornapple	Hydro	WI	1.40	100%
Trego	Hydro	WI	1.50	100%
White River	Hydro	WI	1.00	100%
Wissota	Hydro	WI	40.10	100%
Total Owned Hydropower			270.98	

Owned Biomass	Type	State	Generator Nameplate Capacity (MW)	Percentage Generated from Renewable Energy
Bay Front	Wood/MSW/Coal/Gas	WI	67.22	100.0%
French Island	RDF/Wood/Gas	WI	30.45	100.0%
Red Wing	RDF/Gas	MN	23.00	100.0%
Wilmarth	RDF/Gas	MN	25.00	100.0%
Total Owned Biomass			145.67	

	Generator Nameplate Capacity (MW)
Total Owned Renewables	2,318.15
Total Purchased Renewables	3,208.64
Total Xcel Energy - North Renewables	5,526.79

Attachment IV.
 Renewable Generation and RECs

17.0218%

Purchased Wind	Type	State	2022 Generation (MWh)	2022 RECs	Adjustments	MN Windsource Allocation	Retired Renewable Connect	2022 NSP RECs Available for Compliance	2022 NSPW RECs Available for Compliance	Michigan Allocation 2022
Adams Wind	Wind	MN	58,041	58,041				58,041		9,880
Agassiz	Wind	MN	4,531	4,531				4,531		771
Big Blue Wind Farm	Wind	MN	95,592	95,592				95,592		16,271
Blazing Star 1	Wind	MN	916,029	916,029				916,029		155,925
Boeve	Wind	MN	6,018	6,018		6,018		-		-
Carlton College	Wind	MN	4,804	4,804				4,804		818
Chanarambie PP	Wind	MN	102,660	102,660				102,660		17,475
Cisco	Wind	MN	17,669	17,669		17,669		-		-
Crowned Ridge Wind, LLC	Wind	SD	764,595	764,595				764,595		130,148
Dakota Range III Wind	Wind	SD	508,992	508,992				508,992		86,640
Danielson Wind	Wind	MN	54,150	54,150				54,150		9,217
East Ridge	Wind	MN	24,085	24,085				24,085		4,100
Ewington	Wind	MN	59,077	59,077				59,077		10,056
Fenton Power Partners I & II	Wind	MN	396,871	396,871				396,871		67,555
Fey Windfarm	Wind	MN	5,795	5,795				5,795		986
FPL Mower County	Wind	MN	352,419	352,419				352,419		59,988
Garwin McNeilus Windfarm	Wind	MN	97,135	97,135		21,093		76,042		12,944
Glen Ullin Energy Center	Wind	ND	451,410	451,410				451,410		76,838
Grant County	Wind	MN	63,265	63,265				63,265		10,769
Hilltop	Wind	MN	4,350	4,350				4,350		740
Jeffers	Wind	MN	209,349	209,349				209,349		35,635
JJN Windfarm	Wind	MN	4,056	4,056		4,056		-		-
K-Brink Windfarm	Wind	MN	5,617	5,617		5,617		-		-
KAS Brothers	Wind	MN	4,299	4,299				4,299		732
Lake Benton PP	Wind	MN	703,097	703,097				703,097		119,680
Metro	Wind	MN	822	822				822		140
MinnDakota	Wind	MN/SD	282,124	282,124				282,124		48,023
Moraine II	Wind	MN	97,020	97,020		97,020		-		-
Norgaard North	Wind	MN	84,779	84,779				84,779		14,431
Norgaard South	Wind	MN	61,259	61,259				61,259		10,427
North Community Turbines	Wind	MN	59,904	59,904				59,904		10,197
North Wind Turbines	Wind	MN	61,207	61,207				61,207		10,419
North Shaokotan	Wind	MN	27,658	27,658				27,658		4,708
Odell Wind Farm	Wind	MN	870,321	870,321			142,920	727,401		123,817
Olsen	Wind	MN	1,369	1,369				1,369		233
Pipestone	Wind	MN	19,625	19,625				19,625		3,341
Prairie Rose	Wind	MN	741,776	741,776				741,776		126,264
Ridgewind	Wind	MN	86,666	86,666				86,666		14,752
Rock Aetra Pwr Partners	Wind	MN	5,909	5,909				5,909		1,006
Rock Ridge	Wind	MN	3,476	3,476				3,476		592
Ruthon Ridge	Wind	MN	40,690	40,690				40,690		6,926
Shane	Wind	MN	6,414	6,414				6,414		1,092
Southridge	Wind	MN	3,584	3,584				3,584		610
St Olaf	Wind	MN	11	11				11		2
Tholen	Wind	MN	40,834	40,834				40,834		6,951
Uilk	Wind	MN	14,384	14,384				14,384		2,448
Valley View	Wind	MN	31,456	31,456				31,456		5,354
Velva	Wind	ND	31,669	31,669				31,669		5,391
Westridge Windfarm	Wind	MN	18,837	18,837		7,060		11,777		2,005
Windcurrent Farms	Wind	MN	4,732	4,732		4,663		69		12
Windvest	Wind	MN	4,558	4,558				4,558		776
Winona	Wind	MN	5,199	5,199				5,199		885
Woodstock Hills, LLC	Wind	MN	42,092	42,092				42,092		7,165
Woodstock Municipal	Wind	MN	1,719	1,719				1,719		293
Zephyr Wind	Wind	MN	74,950	74,950				74,950		12,758
Deuel Harvest Wind Energy LLC	Wind	SD	379,965	379,965				379,965		64,677
Heartland Divide	Wind	IA	581,173	581,173				581,173		98,926
Elk Creek Solar Replacement	Wind		156,234	156,234				156,234		26,594
Total Purchased Wind			8,756,322	8,756,322	-	163,196	142,920	8,450,206	1,438,379	53,386

Attachment IV.
 Renewable Generation and RECs

17.0218%

Purchased Solar	Type	State	2022 Generation (MWh)	2022 RECs	Adjustments	MN Windsource Allocation	Retired Renewable Connect	2022 NSP RECs Available for Compliance	2022 NSPW RECs Available for Compliance	Michigan Allocation 2022
PSWIF1, LLC Eau Claire	Solar	WI	886	886	886			-	-	
OE WI Solar 1 (Endicott)	Solar	WI	1,108	1,108	1,108			-	-	
OE WI Solar 2 (Ore Dock)	Solar	WI	1,017	1,017	1,017			-	-	
Aurora Solar Projects	Solar	MN	178,398	178,398				178,398	30,367	
North Star Solar	Solar	MN	191,871	191,871			40,311	151,560	25,798	1,543
Marshall Solar	Solar	MN	101,178	101,178				101,178	17,222	
School Sisters of Notre Dame Solar Park	Solar	MN	1,079	1,079				1,079	184	
Slayton Solar	Solar	MN	2,579	2,579				2,579	439	
St. John's Solar	Solar	MN	753	753				753	128	
DragonFly Solar	Solar	MN	1,034	1,034				1,034	176	
1000 University Properties LP	Solar	MN	37	37				37	6	
Blue Lake Wastewater Treatment	Solar	MN	1,398	1,398				1,398	238	
CHS Field Solar Arrays	Solar	MN	97	97				97	17	
Court International LLC	Solar	MN	1,363	1,363				1,363	232	
DNR Solar	Solar	MN	98	98				98	17	
East Phillips Park Cultural & Community	Solar	MN	128	128				128	22	
freEner-g 2009 Group	Solar	MN	23	23				23	4	
freEner-g 2010 Group	Solar	MN	154	154				154	26	
Hutchinson Wastewater Treatment	Solar	MN	303	303				303	52	
MCC Solar	Solar	MN	581	581				581	99	
Merrick Solar	Solar	MN	-	-				-	-	
Minneapolis /St. Paul International Airp	Solar	MN	11,760	11,760				11,760	2,002	
Nokomis Main Beach - Nokomis	Solar	MN	72	72				72	12	
Parade Ice Garden	Solar	MN	131	131				131	22	
Rev. Dr. Martin Luther King, Jr. Recreati	Solar	MN	168	168				168	29	
Target Midway Store	Solar	MN	561	561				561	95	
UEL Real Estate Holdings LLC	Solar	MN	402	402				402	68	
University Centre @ 1919	Solar	MN	982	982				982	167	
Webber Park - Webber	Solar	MN	121	121				121	21	
Edison Gym	Solar	MN	245	245				245	42	
Edison High School	Solar	MN	255	255				255	43	
Total Purchased Solar			498,782	498,782	3,011	-	40,311	455,460	77,528	1,543

Purchased Hydro	Type	State	2022 Generation (MWh)	2022 RECs	Adjustments	MN Windsource Allocation	Retired Renewable Connect	2022 NSP RECs Available for Compliance	2022 NSPW RECs Available for Compliance	Michigan Allocation
SAF Hydro	Hydro	MN	30,254	30,254				30,254	5,150	
Western Technical College	Hydro	WI	802	802				802	137	105
Total Purchased Hydro			31,056	31,056	0	0		31,056	5,286	105

Purchased Wood	Type	State	2022 Generation (MWh)	2022 RECs	Adjustments	MN Windsource Allocation	Retired Renewable Connect	2022 NSP RECs Available for Compliance	2022 NSPW RECs Available for Compliance	Michigan Allocation
St. Paul Cogen	Wood	MN	142,535	142,535				142,535	24,262	
Total Purchased Wood			142,535	142,535	0	0		142,535	24,262	0

Purchased Bio Gas	Type	State	2022 Generation (MWh)	2022 RECs	Adjustments	MN Windsource Allocation	Retired Renewable Connect	2022 NSP RECs Available for Compliance	2022 NSPW RECs Available for Compliance	Michigan Allocation
GL Bio Gas I	Biogas	WI	10,826	10,826				10,826	1,843	
Green Whey Energy	Biogas	WI	4,353	4,353				4,353	741	
Total Purchased Bio Gas			15,179	15,179	0	0		15,179	2,584	0

Total Purchased Renewables			9,443,874	9,443,874	3,011	163,196	183,231	9,094,436	1,548,038	55,034
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Owned Wind	Type	State	2022 Generation (MWh)	2022 RECs	Adjustments	MN Windsource Allocation	Retired Renewable Connect	2022 NSP RECs Available for Compliance	2022 NSPW RECs Available for Compliance	Michigan Allocation
Blazing Star II Wind	Wind	MN	912,282	912,282				912,282	155,287	
Crowned Ridge II Wind	Wind	SD	883,081	883,081				883,081	150,316	
Courtenay Wind Farm	Wind	ND	816,159	816,159				816,159	138,925	
Border Winds Wind Farm	Wind	ND	662,882	662,882				662,882	112,835	
Dakota Range I & II	Wind	SD	1,145,487	1,145,487				1,145,487	194,983	
Foxtail Wind	Wind	ND	556,599	556,599				556,599	94,743	
Freeborn Wind Farm	Wind	MN	789,339	789,339				789,339	134,360	
Grand Meadow	Wind	MN	252,698	252,698				252,698	43,014	
Nobles Wind Farm	Wind	MN	418,099	418,099				418,099	71,168	
Pleasant Valley Wind Farm	Wind	MN	866,897	866,897				866,897	147,562	
Total Owned Wind			7,303,523	7,303,523	0	0	0	7,303,523	1,243,192	0

Attachment IV.
 Renewable Generation and RECs

17.0218%

Owned Hydropower	Type	State	2022 Generation (MWh)	2022 RECs	Adjustments	MN Windsource Allocation	Retired Renewable Connect	2022 NSP RECs Available for Compliance	2022 NSPW RECs Available for Compliance	Michigan Allocation
Apple River	Hydro	WI	11,144	11,144				11,144	1,897	
Big Falls	Hydro	WI	33,070	33,070				33,070	5,629	
Cedar Falls	Hydro	WI	30,281	30,281				30,281	5,154	
Chippewa Falls	Hydro	WI	60,683	60,683				60,683	10,329	
Cornell	Hydro	WI	71,049	71,049				71,049	12,094	
Eau Claire Dells	Hydro	WI	39,409	39,409				39,409	6,708	
Hayward	Hydro	WI	1,316	1,316				1,316	224	
Hennepin Island/St. Anthony Falls	Hydro	MN	59,027	59,027				59,027	10,047	
Holcombe	Hydro	WI	94,556	94,556				94,556	16,095	
Jim Falls	Hydro	WI	126,397	126,397				126,397	21,515	
Ladysmith	Hydro	WI	9,826	9,826				9,826	1,673	
Menomonie	Hydro	WI	22,987	22,987				22,987	3,913	
Riverdale	Hydro	WI	2,744	2,744				2,744	467	
Saxon Falls	Hydro	WI/MI	9,048	9,048				9,048	1,540	
St Croix	Hydro	WI	93,259	93,259				93,259	15,874	2,768
Superior Falls	Hydro	WI/MI	8,745	8,745				8,745	1,489	
Thornapple	Hydro	WI	6,430	6,430				6,430	1,095	
Trego	Hydro	WI	7,201	7,201				7,201	1,226	
White River	Hydro	WI	3,912	3,912				3,912	666	
Wisota	Hydro	WI	125,766	125,766				125,766	21,408	
Total Owned Hydropower			816,850	816,850	0	0		816,850	139,043	2,768

Owned Biomass (RDF and Wood)	Type	State	2022 Generation (MWh)	2022 RECs	Adjustments	MN Windsource Allocation	Retired Renewable Connect	2022 NSP RECs Available for Compliance	2022 NSPW RECs Available for Compliance	Michigan Allocation
Bay Front	Wood	WI	172,496	172,496				172,496	5,011	
French Island	Wood/RDF	WI	58,793	58,793				58,793	855	2,055
Red Wing	RDF	MN	123,529	123,529				123,529	21,027	
Wilmarth	RDF	MN	94,098	94,098				94,098	16,017	
Total Owned Biomass			448,916	448,916	0	0		448,916	42,910	2,055

			2022 Generation (MWh)	2022 RECs	Adjustments	MN Windsource Allocation	Retired Renewable Connect	2022 NSP RECs Available for Compliance	2022 NSPW RECs Available for Compliance	Michigan Allocation
Total Owned Renewables			8,569,289	8,569,289	0	0		8,569,289	1,425,145	4,823
Total Purchased Renewables			9,443,874	9,443,874	3,011	163,196	183,231	9,094,436	1,548,038	55,034
Total Xcel Energy - North Renewables			18,013,163	18,013,163	3,011	163,196	183,231	17,663,725	2,973,183	59,857

Attachment V.
 RECs Submitted for 2022 MI RPS Compliance

satType	Sub-Account	Sub-Accou	MIRECS ID	Project	Operation B Fuel/Proje	Credit Typ	Credits Vir	Credit Seri	Quantity	Ratio	Adjusted E MI Eligible	MI Eligibility	PAG/ICS I	Green-e E	LIHI Certified
COM	2022 Compliance - Northern States Power Company - Wiscons	1561	IMP279	Fenton Power Partners I (2)	11/13/2007	Wind	RECS	Jan-20 IMP-MRE1	20482	1	20482	Yes	1/31/2025	No	No
									Total	20,482					

Pending Sub-Accounts: 2022 Compliance - Northern States Power Company - Wisconsin Go

Pending Retirement Credits											
Sub-Account	Sub-Account ID	MIRECS ID	Project	Operation Begin Date	Fuel/Project Type	Credit Type	Credits Vintage	Credit Serial Numbers	Quantity	MI Eligible	MI Eligibility End Date
2022 Compliance - Northern States Power Company - Wisconsin	1561	IMP279	Fenton Power Partners I (2) - Fenton Power Partners I (2)	11/13/2007	Wind	RECS	01/2020	IMP-MRETS-REC-279-MN-01-2020-72956-1 to 20482	20,482	Yes	1/31/2025

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Attachment VI.
 Remaining REC Inventory

MRETS Inventory

Account Name	Account ID	M-RETS ID	Unit Name	Fuel Type	Vintage	Location	Quantity (REC)	Serial Numbers
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		1/1/2020	MN	2019	351-MN-01-2020-CA19CF24-1 to 2019
NSP-MI Active	33E405A3-E63	M355	Fenton Pow Wind		1/1/2020	MN	23671	355-MN-01-2020-F63FB6DB-1 to 23671
NSP-MI Active	33E405A3-E63	M356	Fenton Pow Wind		1/1/2020	MN	4377	356-MN-01-2020-D8176D76-1 to 4377
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		2/1/2020	MN	2386	351-MN-02-2020-A0987D5C-1 to 2386
NSP-MI Active	33E405A3-E63	M355	Fenton Pow Wind		2/1/2020	MN	18757	355-MN-02-2020-BF288E26-12053 to 30809
NSP-MI Active	33E405A3-E63	M356	Fenton Pow Wind		2/1/2020	MN	12387	356-MN-02-2020-C5343769-1 to 12387
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		3/1/2020	MN	2342	351-MN-03-2020-B657BF68-1 to 2342
NSP-MI Active	33E405A3-E63	M356	Fenton Pow Wind		3/1/2020	MN	33073	356-MN-03-2020-A18D5D09-1 to 33073
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		4/1/2020	MN	1968	351-MN-04-2020-07020487-1 to 1968
NSP-MI Active	33E405A3-E63	M356	Fenton Pow Wind		4/1/2020	MN	24307	356-MN-04-2020-B3219818-1 to 24307
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		5/1/2020	MN	1764	351-MN-05-2020-1DE3286D-1 to 1764
NSP-MI Active	33E405A3-E63	M356	Fenton Pow Wind		5/1/2020	MN	16347	356-MN-05-2020-1069C963-1 to 16347
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		6/1/2020	MN	664	351-MN-06-2020-BBED0936-1 to 664
NSP-MI Active	33E405A3-E63	M356	Fenton Pow Wind		6/1/2020	MN	13928	356-MN-06-2020-55A14721-1 to 13928
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		7/1/2020	MN	177	351-MN-07-2020-E432629E-1 to 177
NSP-MI Active	33E405A3-E63	M356	Fenton Pow Wind		7/1/2020	MN	16436	356-MN-07-2020-030A443B-1 to 16436
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		8/1/2020	MN	1167	351-MN-08-2020-88BA5743-1 to 1167
NSP-MI Active	33E405A3-E63	M356	Fenton Pow Wind		8/1/2020	MN	22733	356-MN-08-2020-12E4140F-1 to 22733
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		9/1/2020	MN	1416	351-MN-09-2020-05305481-1 to 1416
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		10/1/2020	MN	1458	351-MN-10-2020-B8E3D21F-1 to 1458
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		11/1/2020	MN	1860	351-MN-11-2020-90752764-1 to 1860
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		12/1/2020	MN	1502	351-MN-12-2020-0D937B0D-1 to 1502
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		1/1/2021	MN	969	351-MN-01-2021-515EBADD-1 to 969
NSP-MI Active	33E405A3-E63	M355	Fenton Pow Wind		1/1/2021	MN	27775	355-MN-01-2021-55BD6BC-3284 to 31058
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		2/1/2021	MN	942	351-MN-02-2021-1296C7E4-1 to 942
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		3/1/2021	MN	2492	351-MN-03-2021-7012DADC-1 to 2492
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		4/1/2021	MN	2086	351-MN-04-2021-12FD406F-1 to 2086
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		5/1/2021	MN	1846	351-MN-05-2021-2FB4AE48-1 to 1846
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		6/1/2021	MN	830	351-MN-06-2021-D46A6694-1 to 830
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		7/1/2021	MN	784	351-MN-07-2021-6E487145-1 to 784
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		8/1/2021	MN	1094	351-MN-08-2021-7E6E6975-1 to 1094
NSP-MI Active	33E405A3-E63	M355	Fenton Pow Wind		8/1/2021	MN	14708	355-MN-08-2021-4903C33F-4136 to 18843
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		9/1/2021	MN	1352	351-MN-09-2021-5F092856-1 to 1352
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		10/1/2021	MN	1477	351-MN-10-2021-FD4F9BA5-1 to 1477
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		11/1/2021	MN	2703	351-MN-11-2021-C09880D5-1 to 2703
NSP-MI Active	33E405A3-E63	M351	East Ridge - Wind		12/1/2021	MN	2327	351-MN-12-2021-B621E5AB-1 to 2327
NSP-MI Active	33E405A3-E63	M355	Fenton Pow Wind		1/1/2022	MN	51882	355-MN-01-2022-B24281CE-1 to 51882
NSP-MI Active	33E405A3-E63	M355	Fenton Pow Wind		2/1/2022	MN	7975	355-MN-02-2022-113E9A62-25652 to 33626
Total							325,981	

MIRECS Inventory

satType	Sub-Account	Sub-Account ID	MIRECS ID	Project	Operation E Fuel/Project Type	Credit Type	Credits	Vintage	Credit Seri	Quantity	Ratio	Adjusted E MI Eligible	MI Eligibilit	
ACT	DefaultACT		152	EWR373	Northern States Power Company	Electric Savings	EWR		Dec-21	MIRECS-E	153	1	153 No	2/28/2023
ACT	DefaultACT		152	EWR373	Northern States Power Company	Electric Savings	EWR		Dec-17	MIRECS-E	39	1	39 No	2/28/2019
ACT	DefaultACT		152	EWR373	Northern States Power Company	Electric Savings	EWR		Dec-18	MIRECS-E	115	1	115 No	2/29/2020
ACT	DefaultACT		152	EWR373	Northern States Power Company	Electric Savings	EWR		Dec-19	MIRECS-E	144	1	144 No	2/28/2021
ACT	DefaultACT		152	EWR373	Northern States Power Company	Electric Savings	EWR		Dec-20	MIRECS-E	778	1	778 No	2/28/2022
ACT	DefaultACT		152	EWR374	Northern States Power Company	Gas Savings	EWR		Dec-19	MIRECS-E	1103	1	1103 No	2/28/2021
ACT	DefaultACT		152	EWR374	Northern States Power Company	Gas Savings	EWR		Dec-20	MIRECS-E	739	1	739 No	2/28/2022
ACT	DefaultACT		152	EWR374	Northern States Power Company	Gas Savings	EWR		Dec-18	MIRECS-E	2047	1	2047 No	2/29/2020
ACT	DefaultACT		152	EWR374	Northern States Power Company	Gas Savings	EWR		Dec-21	MIRECS-E	1474	1	1474 No	2/28/2023
ACT	DefaultACT		152	EWR374	Northern States Power Company	Gas Savings	EWR		Dec-17	MIRECS-E	2890	1	2890 No	2/28/2019
Total										9,482				

Footnotes:

RECs actually transferred to MIRECS and submitted for compliance may differ from the generators shown above to improve the efficiency of the MRETS to MIRECS transfer and certification process.

MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
PUBLIC SERVICE COMMISSION

ENTRY OF APPEARANCE IN AN ADMINISTRATIVE HEARING

This form is issued as provided for by 1939 PA 3, as amended, and by 1933 PA 254, as amended. The filing of this form, or an acceptable alternative, is necessary to ensure subsequent service of any hearing notices, Commission orders, and related hearing documents.

General Instructions:

Type or print legibly in ink. For assistance or clarification, please contact the Public Service Commission at 517-284-8090.

*Please Note: The Commission will provide **electronic** service of documents to all parties in this proceeding.*

THIS APPEARANCE TO BE ENTERED IN ASSOCIATION WITH THE ADMINISTRATIVE HEARING:

Case / Company Name: Northern States Power Company Docket No. U- 21355

Please enter my appearance in the above-entitled matter on behalf of:

1. (Name) Northern States Power Company
2. (Name)
3. (Name)
4. (Name)
5. (Name)
6. (Name)
7. (Name)

Name Sherri A. Wellman
Address Miller Canfield
One Michigan Avenue, Suite 900
City Lansing State MI
Zip 48933 Phone 517-483-4954
Email wellmans@millercanfield.com
Date 04/25/2023

<input type="radio"/> I am not an attorney
<input checked="" type="radio"/> I am an attorney whose:
Michigan Bar # is P- <u>38989</u>
_____ Bar # is: _____
(state)

Signature: _____