

215 South Cascade Street  
PO Box 496  
Fergus Falls, Minnesota 56538-0496  
218 739-8200  
[www.otpc.com](http://www.otpc.com) (web site)

September 17, 2024



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

**RE: In the Matter of Impacts of the “Capacity” Definition in Minn. Stat. § 216B.164 and Associated Rules on Net Metering Eligibility for Rate-Regulated Utilities  
Docket No. E017/CI-24-200  
Reply Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits to the Minnesota Public Utilities Commission (Commission) its Reply Comments in the above-referenced matter.

We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. A Certificate of Service is also enclosed.

Please contact me at 218-739-8227 or [canderson@otpc.com](mailto:canderson@otpc.com) if you have any questions regarding this filing.

Sincerely,

*/s/ CODY ANDERSON*  
Cody Anderson  
Transmission & Distribution Studies Engineer  
Delivery Planning

lcd  
Enclosures  
By electronic filing  
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**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

**In the Matter of Impacts of the  
“Capacity” Definition in Minn.  
Stat. § 216B.164 and Associated  
Rules on Net Metering Eligibility  
for Rate-Regulated Utilities**

**Docket No. E017/CI-24-200**

**REPLY COMMENTS**

**I. INTRODUCTION**

Otter Tail Power Company (Otter Tail) respectfully submits these Reply Comments in response to the Initial Comments submitted by the Department of Commerce, Division of Energy Resources (The Department), Xcel Energy, Dakota Electric Association (DEA), Minnesota Power, Minnesota Solar Energy Industries Association (MnSEIA), Nokomis Energy, and Minnesota Rural Electric Association (MREA) on September 3<sup>rd</sup>, 2024 in the above dockets.

**II. OTTER TAIL RESPONSES**

The Initial Comments from the Department, MnSEIA, and Nokomis correctly quote the statutory definition of capacity in Minn. Stat. §216B.164, subd. 2a, however, they misconstrue the Commission’s rules implementing that definition and PURPA requirements, while ignoring other Commission rulings and relevant statutes.

The Commission’s rules, in part 7835.0100, subp. 4, define capacity as: “...the capability to produce, transmit, or deliver electric energy, and is measured by the number of megawatts alternating current at the point of common coupling between a qualifying facility and a utility’s electric system.” The Department, MnSEIA and Nokomis ignore this rule’s salient language, which refers to “capacity” as “the *capability to produce*, transmit or deliver electric energy . . .” (Emphasis added). They also ignore the Commission’s explanation in its Statement of Need and Reasonableness that “capacity is, in effect, the amount of *electricity actually produced*.”<sup>1</sup> Hence, these commenters completely ignore the fact that a distributed solar facility’s capacity is determined by its production capability, not by how much power is “exported” beyond the customer premise to the grid. And because the statute defines capacity as its *alternating current*, a generation facility’s capacity is properly tied to the *production capability*, or nameplate rating, of its inverters.

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<sup>1</sup> SONAR R-04214 pg. 4 – In the Matter of the Proposed Rules of the Public Utilities Commission Governing Cogeneration and Small Power Production.

As explained in the Initial Comments of Xcel Energy, MREA, Dakota Electric, and the other utilities, MnSEIA's interpretation of capacity (apparently adopted by The Department and Nokomis Energy) does not align with the statutes applying that term to net metering or with the Commission's definition of "Capacity" in Rule Part 7835.0100, subp. 4, which measures the capacity based on the system's "*capability to produce*." And as Dakota Electric pointed out in its Initial Comments, the Commission's definition of "point of common coupling" does not support MnSEIA's misreading of those relevant statutes and rules.

The basis behind MnSEIA and Nokomis Energy's misconstrued and incorrect conclusions is their misunderstanding of the differences between the Point of DER Connection / Interconnection (PoC / POI) and the Point of Common Coupling (PCC), both of which were defined in Otter Tail's Initial Comments. MnSEIA and Nokomis Energy are seemingly conflating the PoC / POI definition with the definition of the PCC as if they represent the same point within the system. As previously outlined in our Initial Comments, the PoC / POI is the point just beyond the inverters on the alternating current (AC) side and *before any onsite customer load where the generator production is measured* by the aggregate nameplate rating of the inverter(s), which are the devices that convert the direct current (DC) into usable 60 Hz alternating current (AC). Conversely, the PCC is the point beyond both the PoC / POI and the customer onsite load where any excess generation gets *exported* out to the Distribution Grid or Area Electric Power System (Area EPS). MnSEIA is incorrectly arguing that the *exported value, which is inclusive of onsite customer load*, is the location to measure capacity as it pertains to qualifying for certain rate eligibility. Due to customers being able to add or remove onsite load without informing the Utility, this would make capacity variable in nature, at the point MnSEIA wants to measure it. This means there would be no fixed capacity value to properly classify the capacity of the facility in an adequate, fair, and consistent manner. The only reasonable location to classify a facility's capacity is the PoC / POI, as outlined extensively in Otter Tail's Initial Comments. This is because measurement at the PoC / POI location provides a *fixed* (exclusive of onsite load) and *consistent* way to measure capacity so that the utility may determine if the capacity qualifies for the average retail utility rates for 40 kW and under.

As explained in MREA's Initial Comments and the Initial Comments of others, the plain language of the capacity definition statute ties a Qualified Facility's (QF's) eligibility for retail rate compensation specifically to the capacity that QF possesses. In other words, a QF's net input to the grid is eligible for retail rate compensation only if it is produced by a QF that has a capacity below 40 kilowatts. The statute clearly differentiates between "net input" or "export" to the grid on one hand and a "QF's capacity" on the other. If the

statute had meant what MnSEIA, Nokomis Energy, and The Department suggest, it would have simply provided that a QF's "net input of up to 40 kilowatts is eligible for retail rate compensation." Instead, the statute says a QF's "net input" is eligible for retail rate compensation *if that net input comes from "a qualifying facility having less than 40 kilowatts capacity..."* Therefore, MnSEIA's interpretation that a QF's net grid export defines its capacity is nonsensical and cannot be reasonably reconciled with the plain language found in the statute. MnSEIA's interpretation also conflicts with the statutorily defined intent that net metered facilities are for the purpose of offsetting energy use, not exporting power to the grid because it would allow retail rate compensation for net exports without accounting for the interconnection customer's onsite load and offsetting use of the QF's production.

The Department and MnSEIA also do not properly apply subd. 2 of Minnesota's PURPA Implementation Statute, which provides that the FERC regulations under PURPA, unless otherwise provided by the Minnesota PURPA Implementation Statute, apply to all Minnesota electric utilities, including cooperative electric associations and municipal electric utilities. The Company's Initial Comments showed that the FERC's regulations under PURPA require that the capacity of a QF be measured based on energy produced at the inverter with no off-set for onsite load not associated with the energy generation.

Yet, the Department acknowledges that the "net metered" facility, under the Minnesota PURPA Implementation Statute, and a QF under both this statute and PURPA, have the same definition of capacity. We agree with the Department that the definition of the capacity of a "net metered facility" is the same as that for a QF. A "net metered facility" is a subset of what qualifies as a QF. A "net metered facility" is a QF that is constructed for the purpose of offsetting energy use through the use of renewable energy or high-efficiency distributed generation sources (Minn. Stat. §216B.164, subd. 2a (j)) and if it has a capacity below a certain threshold (40 kW for cooperative and municipal utilities, 1000 kW for investor-owned utilities) it is eligible for average retail utility rate compensation.

The inter-relatedness of what the term "capacity" means for QFs and "net metered facilities" as a subset of QFs is apparent in the fact that neither the applicable statutes nor rules suggest any difference between the two. The state statutes equate the capacity determination for each in subd. 3 (pars. e and f) and in subd. 3a (par. b). The Uniform Statewide Contract under Minn. R. 7835.9910 (to which net metering applies) refers to the customer as being a QF. Instead of following the FERC definition of capacity for a QF under PURPA and using the same approach for a "net metered facility," the Department suggests an alternate definition of capacity for a "net metered facility" different than how

FERC defines capacity for a QF. This approach would violate the state law that requires symmetry between the Minnesota PURPA Implementing Statute and PURPA.

The Department further shows its misunderstanding of the interrelatedness of capacity definitions for billing and interconnection purposes at page 7 of its comments where it asserts the following:

For purposes of interconnection requirements, DER capacity is referred to in a distinct manner from that of net-metered rate eligibility. This distinct approach is appropriate for the context, given the safety and reliability concerns related to interconnection, but it also must remain distinct from net-metered rate eligibility.

The Department's position is untenable. State law requires participants in net metering to sign the Commission's Uniform Statewide Contract at Minn. R. 7835.9910. This contract form has a blank space towards the beginning where the party need to enter the "rating" of the QF system that is subject to the Uniform Statewide Contract. Under MN DIP 1.1.5, the Uniform Statewide Contract replaces the need to have a signed Minnesota Distributed Energy Resource Interconnection Agreement (MN DIA) where the system is 20 kW or less capacity. Accordingly, there are many QFs that have signed the Uniform Statewide Contract with a single set capacity size that applies to both the MN DIP size and net metering size. Further, there are many systems that require having both a signed Uniform Statewide Contract and a MN DIA. Under the Department's approach, these two contracts would reflect differently sized systems. This would unnecessarily complicate the already complex statewide interconnection and net metering process in Minnesota.

### **III. CONCLUSION**

The Commission should not change its long-standing interpretation of "capacity." The Commission should continue to align with the FERC definition of capacity for QFs (and the subset of QFs called net metered facilities). The Minnesota PURPA Implementation Statute on this issue has not changed. It would not be proper for the Commission to change its interpretation of this statute now.

Dated: September 17, 2024

Respectfully submitted,

**OTTER TAIL POWER COMPANY**

By: /s/ CODY ANDERSON

Cody Anderson

Transmission & Distribution Studies Engineer

Delivery Planning

Otter Tail Power Company

215 S. Cascade Street

Fergus Falls, MN 56537

(218) 739-8227

[canderson@otpc.com](mailto:canderson@otpc.com)

## CERTIFICATE OF SERVICE

**RE: In the Matter of Impacts of the “Capacity” Definition in Minn. Stat. § 216B.164 and Associated Rules on Net Metering Eligibility for Rate-Regulated Utilities  
Docket No. E017/CI-24-200**

I, Laura Dewey, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company  
Reply Comments**

Dated this 17<sup>th</sup> day of **September, 2024**.

/s/ LAURA DEWEY  
Laura Dewey  
Regulatory Filing Coordinator  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls MN 56537  
(218) 739-8604

| First Name | Last Name       | Email                            | Company Name                      | Address   | Delivery Method    | View Trade Secret | Service List Name      |
|------------|-----------------|----------------------------------|-----------------------------------|---|--------------------|-------------------|------------------------|
| Ross       | Abbey           | ross.abbey@us-solar.com          | United States Solar Corp.         | 100 North 6th St Ste 222C<br><br>Minneapolis,<br>MN<br>55403    | Electronic Service | No                | OFF_SL_24-200_Official |
| Brian      | Allen           | brian.allen@allenergysolar.com   | All Energy Solar, Inc             | 1642 Carroll Ave<br><br>Saint Paul,<br>MN<br>55104              | Electronic Service | No                | OFF_SL_24-200_Official |
| Michael    | Allen           | michael.allen@allenergysolar.com | All Energy Solar                  | 721 W 26th st Suite 211<br><br>Minneapolis,<br>MN<br>55405      | Electronic Service | No                | OFF_SL_24-200_Official |
| David      | Amster Olzweski | david@mysunshare.com             | SunShare, LLC                     | 1151 Bannock St<br><br>Denver,<br>CO<br>80204-8020              | Electronic Service | No                | OFF_SL_24-200_Official |
| Jay        | Anderson        | jaya@cmpas.org                   | CMPAS                             | 7550 Corporate Way<br>Suite 100<br>Eden Prairie,<br>MN<br>55344 | Electronic Service | No                | OFF_SL_24-200_Official |
| Janet      | Anderson        | jcainstp@icloud.com              | -                                 | 1799 Sargent<br><br>St. Paul,<br>MN<br>55105                    | Electronic Service | No                | OFF_SL_24-200_Official |
| Christine  | Andrews         | christineandrewsjd@gmail.com     |                                   | 792 Goodrich Ave<br><br>St Paul,<br>MN<br>55105                 | Electronic Service | No                | OFF_SL_24-200_Official |
| John       | Bailey          | bailey@ilsr.org                  | Institute For Local Self-Reliance | 1313 5th St SE Ste 303<br><br>Minneapolis,<br>MN<br>55414       | Electronic Service | No                | OFF_SL_24-200_Official |
| Mark       | Bakk            | mbakk@lcp.coop                   | Lake Country Power                | 26039 Bear Ridge Drive<br><br>Cohasset,<br>MN<br>55721          | Electronic Service | No                | OFF_SL_24-200_Official |
| Laura      | Beaton          | beaton@smwlaw.com                | Shute, Mihaly & Weinberger LLP    | 396 Hayes Street<br><br>San Francisco,<br>CA<br>94102           | Electronic Service | No                | OFF_SL_24-200_Official |
|            |                 |                                  |                                   |   |                    |                   |                        |



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|-------------|-----------|--|---------------------------------------|--|--------------------|-------------------|------------------------|
| Jeff        | Benson    | jbenson@southcentralelect<br>ric.com       | South Central Electric<br>Association | PO Box 150<br>71176 Tiell Drive<br>St. James,<br>MN<br>56081               | Electronic Service | No                | OFF_SL_24-200_Official |
| Derek       | Bertsch   | derek.bertsch@mrenergy.c<br>om             | Missouri River Energy<br>Services     | 3724 West Avera Drive<br>PO Box 88920<br>Sioux Falls,<br>SD<br>57109-8920  | Electronic Service | No                | OFF_SL_24-200_Official |
| Barb        | Bischoff  | barb.bischoff@nngco.com                    | Northern Natural Gas Co.              | CORP HQ, 714<br>1111 So. 103rd Street<br>Omaha,<br>NE<br>681241000         | Electronic Service | No                | OFF_SL_24-200_Official |
| William     | Black     | bblack@mmua.org                            | MMUA                                  | Suite 200<br>3131 Fernbrook Lane North<br><br>Plymouth,<br>MN<br>55447     | Electronic Service | No                | OFF_SL_24-200_Official |
| Kenneth     | Bradley   | kbradley1965@gmail.com                     |                                       | 2837 Emerson Ave S Apt<br>CW112<br><br>Minneapolis,<br>MN<br>55408         | Electronic Service | No                | OFF_SL_24-200_Official |
| Jon         | Brekke    | jbrekke@grenergy.com                       | Great River Energy                    | 12300 Elm Creek<br>Boulevard<br><br>Maple Grove,<br>MN<br>553694718        | Electronic Service | No                | OFF_SL_24-200_Official |
| Kathleen    | Brennan   | kbrennan@spencerfane.co<br>m               | Spencer Fane LLP                      | 100 South Fifth Street,<br>Suite 2500<br><br>Minneapolis,<br>MN<br>55402   | Electronic Service | No                | OFF_SL_24-200_Official |
| Mark B.     | Bring     | mbring@otpc.com                            | Otter Tail Power Company              | 215 South Cascade Street<br>PO Box 496<br>Fergus Falls,<br>MN<br>565380496 | Electronic Service | No                | OFF_SL_24-200_Official |
| Christopher | Browning  | christopher.browning@next<br>eraenergy.com |                                       | N/A  | Electronic Service | No                | OFF_SL_24-200_Official |
| Christina   | Brusven   | cbrusven@fredlaw.com                       | Fredrikson Byron                      | 60 S 6th St Ste 1500<br><br>Minneapolis,<br>MN<br>55402-4400               | Electronic Service | No                | OFF_SL_24-200_Official |

| First Name     | Last Name          | Email                             | Company Name                                  | Address   | Delivery Method    | View Trade Secret | Service List Name      |
|----------------|--------------------|-----------------------------------|---|---|--------------------|-------------------|------------------------|
| Jessica        | Burdette           | jessica.burdette@state.mn.us      | Department of Commerce                        | 85 7th Place East<br>Suite 500<br>St. Paul,<br>MN<br>55101            | Electronic Service | No                | OFF_SL_24-200_Official |
| Jerry          | Byer               | jbyer@itasca-mantrap.com          | Itasca-Mantrap Coop.<br>Electric Assn.        | PO Box 192<br><br>Park Rapids,<br>MN<br>56470                         | Electronic Service | No                | OFF_SL_24-200_Official |
| Daniel T       | Carlisle           | todd-wad@toddwadana.coop          | Todd-Wadana Electric<br>Cooperative           | 550 Ash Ave NE<br>PO Box 431<br>Wadena,<br>MN<br>56482                | Electronic Service | No                | OFF_SL_24-200_Official |
| Douglas M.     | Carnival           | dcarnival@carnivalberns.com       | McGrann Shea Carnival<br>Straughn & Lamb      | N/A   | Electronic Service | No                | OFF_SL_24-200_Official |
| Pat            | Carruth            | pat@mnvalleyrec.com               | Minnesota Valley Coop.<br>Light & Power Assn. | 501 S 1st St.<br>PO Box 248<br>Montevideo,<br>MN<br>56265             | Electronic Service | No                | OFF_SL_24-200_Official |
| Kenneth A.     | Colburn            | kcolburn@symbioticstrategies.com  | Symbiotic Strategies, LLC                     | 26 Winton Road<br><br>Meredith,<br>NH<br>32535413                     | Electronic Service | No                | OFF_SL_24-200_Official |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | Office of the Attorney<br>General-DOC         | 445 Minnesota Street Suite<br>1400<br><br>St. Paul,<br>MN<br>55101    | Electronic Service | Yes               | OFF_SL_24-200_Official |
| Brandon        | Cox                | brandon.cox@magellanlp.com        | Magellan Pipeline<br>Company, L.P.            | 6160 Summit Dr N, Suite<br>205<br><br>Brooklyn Center,<br>MN<br>55430 | Electronic Service | No                | OFF_SL_24-200_Official |
| Kevin          | Cray               | kevin@communitysolaraccess.org    | CCSA  | 1644 Platte St<br><br>Denver,<br>CO<br>80202                          | Electronic Service | No                | OFF_SL_24-200_Official |
| George         | Crocker            | gwillc@nawo.org                   | North American Water<br>Office                | 5093 Keats Avenue<br><br>Lake Elmo,<br>MN<br>55042                    | Electronic Service | No                | OFF_SL_24-200_Official |

| First Name | Last Name   | Email                               | Company Name                          | Address   | Delivery Method    | View Trade Secret | Service List Name      |
|------------|-------------|-------------------------------------|---------------------------------------|---|--------------------|-------------------|------------------------|
| Ross       | Crutchfield | Ross.Crutchfield@magellanlp.com     | Magellan Pipeline Company, L.P.       | One Williams Center<br>Tulsa,<br>OK<br>74172            | Electronic Service | No                | OFF_SL_24-200_Official |
| Stacy      | Dahl        | sdahl@minnkota.com                  | Minnkota Power Cooperative, Inc.      | 5301 32nd Ave S<br>Grand Forks,<br>ND<br>58201          | Electronic Service | No                | OFF_SL_24-200_Official |
| Lisa       | Daniels     | lisadaniels@windustry.org           | Windustry                             | 201 Ridgewood Ave<br>Minneapolis,<br>MN<br>55403        | Electronic Service | No                | OFF_SL_24-200_Official |
| James      | Darabi      | james.darabi@solarfarm.com          | Solar Farm, LLC                       | 2355 Fairview Ave #101<br>St. Paul,<br>MN<br>55113      | Electronic Service | No                | OFF_SL_24-200_Official |
| Danielle   | DeMarre     | danielle.demarre@allenergysolar.com | All Energy Solar                      | 1264 Energy Lane<br>St Paul,<br>MN<br>55108             | Electronic Service | No                | OFF_SL_24-200_Official |
| James      | Denniston   | james.r.denniston@xcenergy.com      | Xcel Energy Services, Inc.            | 414 Nicollet Mall, 401-8<br>Minneapolis,<br>MN<br>55401 | Electronic Service | No                | OFF_SL_24-200_Official |
| Curt       | Dieren      | curt.dieren@dgr.com                 | L&O Power Cooperative                 | 1302 S Union St<br>Rock Rapids,<br>IA<br>51246          | Electronic Service | No                | OFF_SL_24-200_Official |
| Cheryl     | Dietrich    | cheryl.dietrich@nexteraenergy.com   | NextEra Energy Resources, LLC         | 700 Universe Blvd E1W/JB<br>Juno Beach,<br>FL<br>33408  | Electronic Service | No                | OFF_SL_24-200_Official |
| Kristin    | Dolan       | kdolan@meeker.coop                  | Meeker Cooperative Light & Power Assn | 1725 US Hwy 12 E. Ste 100<br>Litchfield,<br>MN<br>55355 | Electronic Service | No                | OFF_SL_24-200_Official |
|            |             |                                     |                                       |   |                    |                   |                        |

| First Name | Last Name      | Email                            | Company Name                                     | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|------------|----------------|----------------------------------|--|--|--------------------|-------------------|------------------------|
| Richard    | Dornfeld       | Richard.Dornfeld@ag.state.mn.us  | Office of the Attorney General-DOC               | Minnesota Attorney General's Office<br>445 Minnesota Street,<br>Suite 1800<br>Saint Paul,<br>MN<br>55101 | Electronic Service | No                | OFF_SL_24-200_Official |
| Steve      | Downer         | sdowner@mmua.org                 | MMUA   | 3025 Harbor Ln N Ste 400<br><br>Plymouth,<br>MN<br>554475142   | Electronic Service | No                | OFF_SL_24-200_Official |
| Renee      | Doyle          | guydoyleelectric@gmail.com       | Doyle Electric Inc.                              | PO Box 295<br><br>Amboy,<br>MN<br>56010  | Electronic Service | No                | OFF_SL_24-200_Official |
| John R.    | Dunlop, P.E.   | JDunlop@RESMinn.com              | Renewable Energy Services                        | Suite 300<br>448 Morgan Ave. S.<br>Minneapolis,<br>MN<br>554052030                                       | Electronic Service | No                | OFF_SL_24-200_Official |
| Kristen    | Eide Tollefson | healingsystems69@gmail.com       | R-CURE   | 28477 N Lake Ave<br><br>Frontenac,<br>MN<br>55026-1044   | Electronic Service | No                | OFF_SL_24-200_Official |
| R. Neal    | Elliot         | RNElliott@aceee.org              | American Council for an Energy-Efficient Economy | ACEEE<br>529 14th St NW Ste 600<br>Washington,<br>DC<br>20045  | Electronic Service | No                | OFF_SL_24-200_Official |
| Nadav      | Enbar          | nenbar@epri.com                  | EPRI   | 1117 Quince Ave<br><br>Boulder,<br>CO<br>80304   | Electronic Service | No                | OFF_SL_24-200_Official |
| Betsy      | Engelking      | betsy@nationalgridrenewables.com | National Grid Renewables                         | 8400 Normandale Lake Blvd<br><br>Ste 1200<br>Bloomington,<br>MN<br>55437                                 | Electronic Service | No                | OFF_SL_24-200_Official |
| Oncu       | Er             | oncu.er@avantenergy.com          | Avant Energy, Agent for MMPA                     | 220 S. Sixth St. Ste. 1300<br><br>Minneapolis,<br>MN<br>55402  | Electronic Service | No                | OFF_SL_24-200_Official |

| 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<br>Institute for Local Self-Reliance<br>Minneapolis, MN<br>55406 | Electronic Service | No                | OFF_SL_24-200_Official |
| Sharon     | Ferguson  | sharon.ferguson@state.mn.us       | Department of Commerce              | 85 7th Place E Ste 280<br><br>Saint Paul, MN<br>551012198                        | Electronic Service | No                | OFF_SL_24-200_Official |
| Christine  | Fox       | cfox@itasca-mantrap.com           | Itasca-Mantrap Coop. Electric Assn. | PO Box 192<br><br>Park Rapids, MN<br>56470                                       | Electronic Service | No                | OFF_SL_24-200_Official |
| Kornbaum   | Frank     | fkornbaum@mnpower.com             |                                     | N/A  | Electronic Service | No                | OFF_SL_24-200_Official |
| Nathan     | Franzen   | nathan@nationalgridrenewables.com | Geronimo Energy, LLC                | 8400 Normandale Lake Blvd<br><br>Ste 1200<br>Bloomington, MN<br>55437            | Electronic Service | No                | OFF_SL_24-200_Official |
| David      | Freestate | dfreestate@epri.com               | EPRI                                | 942 Corridor Park Blvd<br><br>Knoxville, TN<br>37932                             | Electronic Service | No                | OFF_SL_24-200_Official |
| Katelyn    | Frye      | kfrye@mnpower.com                 | Minnesota Power                     | 30 W Superior St<br><br>Duluth, MN<br>558022093                                  | Electronic Service | No                | OFF_SL_24-200_Official |
| Hal        | Galvin    | halgalvin@comcast.net             | Provectus Energy Development llc    | 1936 Kenwood Parkway<br><br>Minneapolis, MN<br>55405                             | Electronic Service | No                | OFF_SL_24-200_Official |
| Edward     | Garvey    | garveyed@aol.com                  | Residence                           | 32 Lawton St<br><br>Saint Paul, MN<br>55102                                      | Electronic Service | No                | OFF_SL_24-200_Official |
| Allen      | Gleckner  | gleckner@fresh-energy.org         | Fresh Energy                        | 408 St. Peter Street<br>Ste 350<br>Saint Paul, MN<br>55102                       | Electronic Service | No                | OFF_SL_24-200_Official |

| First Name | Last Name  | Email                                     | Company Name                           | Address   | Delivery Method    | View Trade Secret | Service List Name      |
|------------|------------|---|--|---|--------------------|-------------------|------------------------|
| Jenny      | Glumack    | jenny@mrea.org                            | Minnesota Rural Electric Association   | 11640 73rd Ave N<br>Maple Grove,<br>MN<br>55369                 | Electronic Service | No                | OFF_SL_24-200_Official |
| Sarah      | Groebner   | sgroebner@redwoodelectri<br>c.com         | Redwood Electric<br>Cooperative        | 60 Pine St<br>Clements,<br>MN<br>56224                          | Electronic Service | No                | OFF_SL_24-200_Official |
| Cody       | Gustafson  | cgustafson@mnpower.com                    |  | N/A   | Electronic Service | No                | OFF_SL_24-200_Official |
| Tom        | Guttormson | Tom.Guttormson@connexu<br>senergy.com     | Connexus Energy                        | 14601 Ramsey Blvd<br>Ramsey,<br>MN<br>55303                     | Electronic Service | No                | OFF_SL_24-200_Official |
| Natalie    | Haberman   | townsend@fresh-<br>energy.org             | Fresh Energy                           | 408 St Peter St # 350<br>St. Paul,<br>MN<br>55102               | Electronic Service | No                | OFF_SL_24-200_Official |
| James      | Haler      | jhaler@southcentralelectric<br>.com       | South Central Electric<br>Association  | 71176 Tiell Dr<br>P. O. Box 150<br>St. James,<br>MN<br>56081    | Electronic Service | No                | OFF_SL_24-200_Official |
| Donald     | Hanson     | dfhanson@ieeee.org                        | Solar Photovoltaic Systems             | P. O. Box 44579<br>Eden Prairie,<br>MN<br>55344                 | Electronic Service | No                | OFF_SL_24-200_Official |
| John       | Harlander  | john.c.harlander@xcelener<br>gy.com       | Xcel Energy                            | N/A   | Electronic Service | No                | OFF_SL_24-200_Official |
| Adam       | Heinen     | aheinen@dakotaelectric.co<br>m            | Dakota Electric Association            | 4300 220th St W<br>Farmington,<br>MN<br>55024                   | Electronic Service | No                | OFF_SL_24-200_Official |
| Jared      | Hendricks  | jared.hendricks@owatonna<br>utilities.com | Owatonna Municipal Public<br>Utilities | PO Box 800<br>208 S Walnut Ave<br>Owatonna,<br>MN<br>55060-2940 | Electronic Service | No                | OFF_SL_24-200_Official |
| Annete     | Henkel     | mui@mnuilityinvestors.org                 | Minnesota Utility Investors            | 413 Wacouta Street<br>#230<br>St.Paul,<br>MN<br>55101           | Electronic Service | No                | OFF_SL_24-200_Official |

| First Name | Last Name | Email                              | Company Name                             | Address   | Delivery Method    | View Trade Secret | Service List Name      |
|------------|-----------|------------------------------------|--|---|--------------------|-------------------|------------------------|
| Joe        | Hoffman   | ja.hoffman@smmpa.org               | SMMPA                                    | 500 First Ave SW<br>Rochester,<br>MN<br>55902-3303      | Electronic Service | No                | OFF_SL_24-200_Official |
| Ronald     | Horman    | rhorman@redwoodelectric.com        | Redwood Electric Cooperative             | 60 Pine Street<br>Clements,<br>MN<br>56224              | Electronic Service | No                | OFF_SL_24-200_Official |
| Lori       | Hoyum     | lhoyum@mnpower.com                 | Minnesota Power                          | 30 West Superior Street<br>Duluth,<br>MN<br>55802       | Electronic Service | No                | OFF_SL_24-200_Official |
| Jan        | Hubbard   | jan.hubbard@comcast.net            |  | 7730 Mississippi Lane<br>Brooklyn Park,<br>MN<br>55444  | Electronic Service | No                | OFF_SL_24-200_Official |
| Dean       | Hunter    | Dean.Hunter@state.mn.us            | Minnesota Department of Labor & Industry | 443 Lafayette Rd N<br>St. Paul,<br>MN<br>55155-4341     | Electronic Service | No                | OFF_SL_24-200_Official |
| Ralph      | Jacobson  | ralphj@ips-solar.com               |  | 2126 Roblyn Avenue<br>Saint Paul,<br>MN<br>55104        | Electronic Service | No                | OFF_SL_24-200_Official |
| Casey      | Jacobson  | cjacobson@bepc.com                 | Basin Electric Power Cooperative         | 1717 East Interstate Avenue<br>Bismarck,<br>ND<br>58501 | Electronic Service | No                | OFF_SL_24-200_Official |
| John S.    | Jaffray   | jjaffray@jirpower.com              | JJR Power                                | 350 Highway 7 Suite 236<br>Excelsior,<br>MN<br>55331    | Electronic Service | No                | OFF_SL_24-200_Official |
| Robert     | Jagusch   | rjagusch@mmua.org                  | MMUA                                     | 3025 Harbor Lane N<br>Minneapolis,<br>MN<br>55447       | Electronic Service | No                | OFF_SL_24-200_Official |
| Chris      | Jarosch   | chris@carrcreekelectricservice.com | Carr Creek Electric Service, LLC         | 209 Sommers Street North<br>Hudson,<br>WI<br>54016      | Electronic Service | No                | OFF_SL_24-200_Official |

| First Name | Last Name        | Email                         | Company Name                            | Address  | Delivery Method    | View Trade Secret | Service List Name      |
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| Brian      | Jeremiason       | bjeremiason@llec.coop         | Lyon-Lincoln Electric Cooperative, Inc. | 205 W. Hwy. 14<br><br>Tyler,<br>MN<br>56178  | Electronic Service | No                | OFF_SL_24-200_Official |
| Sarah      | Johnson Phillips | sarah.phillips@stoel.com      | Stoel Rives LLP                         | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402                     | Electronic Service | No                | OFF_SL_24-200_Official |
| Nate       | Jones            | njones@hcpd.com               | Heartland Consumers Power               | PO Box 248<br><br>Madison,<br>SD<br>57042  | Electronic Service | No                | OFF_SL_24-200_Official |
| Kevin      | Joyce            | kjoyce@tesla.com              |   | N/A  | Electronic Service | No                | OFF_SL_24-200_Official |
| Mahmoud    | Kabalan          | mahmoud.kabalan@stthomas.edu  | University of St Thomas                 | 2115 Summit Ave. Mail<br>OSS100<br>School of Engineering<br>Saint Paul,<br>MN<br>55105 | Electronic Service | No                | OFF_SL_24-200_Official |
| Camille    | Kadoch           | ckadoch@raponline.org         | Regulatory Assistance Project           | 50 State Street Suite 3<br><br>Montpelier,<br>VT<br>05602                              | Electronic Service | No                | OFF_SL_24-200_Official |
| Ralph      | Kaehler          | Ralph.Kaehler@gmail.com       |   | 13700 Co. Rd. 9<br><br>Eyota,<br>MN<br>55934   | Electronic Service | No                | OFF_SL_24-200_Official |
| Cliff      | Kaehler          | cliff.kaehler@novelenergy.biz | Novel Energy Solutions LLC              | 4710 Blaylock Way<br><br>Inver Grove Heights,<br>MN<br>55076                           | Electronic Service | No                | OFF_SL_24-200_Official |
| Michael    | Kampmeyer        | mkampmeyer@a-e-group.com      | AEG Group, LLC                          | 260 Salem Church Road<br><br>Sunfish Lake,<br>MN<br>55118                              | Electronic Service | No                | OFF_SL_24-200_Official |
| Jack       | Kegel            | jkegel@mmua.org               | MMUA                                    | 3025 Harbor Lane N Suite<br>400<br><br>Plymouth,<br>MN<br>55447-5142                   | Electronic Service | No                | OFF_SL_24-200_Official |



| First Name | Last Name | Email                          | Company Name                       | Address   | Delivery Method    | View Trade Secret | Service List Name      |
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| Tom        | Key       | tkey@epri.com                  | EPRI                               | 942 Corridor Park Blvd<br><br>Knoxville,<br>TN<br>37932                     | Electronic Service | No                | OFF_SL_24-200_Official |
| Bobby      | King      | bking@solarunitedneighbors.org | Solar United Neighbors             | 3140 43rd Ave S<br><br>Minneapolis,<br>MN<br>55406                          | Paper Service      | No                | OFF_SL_24-200_Official |
| Brad       | Klein     | bklein@elpc.org                | Environmental Law & Policy Center  | 35 E. Wacker Drive, Suite 1600<br><br>Suite 1600<br>Chicago,<br>IL<br>60601 | Electronic Service | No                | OFF_SL_24-200_Official |
| Jack       | Kluempke  | Jack.Kluempke@state.mn.us      | Department of Commerce             | 85 7th Place East<br>Suite 600<br>St. Paul,<br>MN<br>55101                  | Electronic Service | No                | OFF_SL_24-200_Official |
| Steve      | Kosbab    | skosbab@meeker.coop            | Meeker Cooperative Light and Power | 1725 US Hwy 12 E<br><br>Litchfield,<br>MN<br>55355                          | Electronic Service | No                | OFF_SL_24-200_Official |
| Michael    | Krause    | michaelkrause61@yahoo.com      | Kandiyo Consulting, LLC            | 1200 Plymouth Avenue<br><br>Minneapolis,<br>MN<br>55411                     | Electronic Service | No                | OFF_SL_24-200_Official |
| Michael    | Krikava   | mkrikava@taftlaw.com           | Taft Stettinius & Hollister LLP    | 2200 IDS Center<br>80 S 8th St<br>Minneapolis,<br>MN<br>55402               | Electronic Service | No                | OFF_SL_24-200_Official |
| Corrina    | Kumpe     | ckumpe@mysunshare.com          |                                    | N/A   | Electronic Service | No                | OFF_SL_24-200_Official |
| Mark       | Larson    | mlarson@meeker.coop            | Meeker Coop Light & Power Assn     | 1725 Highway 12 E Ste 100<br><br>Litchfield,<br>MN<br>55355                 | Electronic Service | No                | OFF_SL_24-200_Official |
| Burnell    | Lauer     | blauer.sundial@gmail.com       | Sundial Solar                      | 3209 W. 76th St #305<br><br>Edina,<br>MN<br>55435                           | Electronic Service | No                | OFF_SL_24-200_Official |

| First Name | Last Name     | Email                                | Company Name                                 | Address   | Delivery Method    | View Trade Secret | Service List Name      |
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| Dean       | Leischow      | dean@sunrisenrg.com                  | Sunrise Energy Ventures                      | 315 Manitoba Ave Ste 200<br><br>Wayzata,<br>MN<br>55391               | Electronic Service | No                | OFF_SL_24-200_Official |
| Annie      | Levenson Falk | annief@cupminnesota.org              | Citizens Utility Board of Minnesota          | 332 Minnesota Street,<br>Suite W1360<br><br>St. Paul,<br>MN<br>55101  | Electronic Service | No                | OFF_SL_24-200_Official |
| Amy        | Liberkowski   | amy.a.liberkowski@xcelen<br>ergy.com | Xcel Energy                                  | 414 Nicollet Mall<br>7th Floor<br>Minneapolis,<br>MN<br>554011993     | Electronic Service | No                | OFF_SL_24-200_Official |
| Carl       | Linville      | clinville@raponline.org              | Regulatory Assistance<br>Project             | 50 State Street Suite #3<br><br>Montpelier,<br>VT<br>05602            | Electronic Service | No                | OFF_SL_24-200_Official |
| Phillip    | Lipetsky      | greenenergyproductsllc@g<br>mail.com | Green Energy Products                        | PO Box 108<br><br>Springfield,<br>MN<br>56087                         | Electronic Service | No                | OFF_SL_24-200_Official |
| Jody       | Londo         | jody.l.londo@xcelenenergy.co<br>m    | Xcel Energy                                  | 414 Nicollet Mall<br>7th Floor<br>Minneapolis,<br>MN<br>554011993     | Electronic Service | No                | OFF_SL_24-200_Official |
| Brian      | Lydic         | brian@irecusa.org                    | Interstate Renewable<br>Energy Council, Inc. | PO Box 1156<br><br>Latham,<br>NY<br>12110-1156                        | Electronic Service | No                | OFF_SL_24-200_Official |
| Richard    | Macke         | macker@powersystem.org               | Power System<br>Engineering, Inc.            | 10710 Town Square Dr NE<br>Ste 201<br><br>Minneapolis,<br>MN<br>55449 | Electronic Service | No                | OFF_SL_24-200_Official |
| Alex       | Magerko       | amagerko@epri.com                    | EPRI   | 942 Corridor Park Blvd<br><br>Knoxville,<br>TN<br>37932               | Electronic Service | No                | OFF_SL_24-200_Official |
|            |               |                                      |  |   |                    |                   |                        |

| First Name | Last Name  | Email                          | Company Name                       | Address  | Delivery Method    | View Trade Secret | Service List Name      |
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| Patrick    | Mahlberg   | pmahlberg@fredlaw.com          | Fredrikson & Byron, P.A.           | 60 S Sixth St Ste 1500<br><br>Minneapolis,<br>MN<br>55402-4400             | Electronic Service | No                | OFF_SL_24-200_Official |
| Jess       | McCullough | jmccullough@mnpower.com        | Minnesota Power                    | 30 W Superior St<br><br>Duluth,<br>MN<br>55802                             | Electronic Service | No                | OFF_SL_24-200_Official |
| Sara G     | McGrane    | smcgrane@felhaber.com          | Felhaber Larson                    | 220 S 6th St Ste 2200<br><br>Minneapolis,<br>MN<br>55420                   | Electronic Service | No                | OFF_SL_24-200_Official |
| Natalie    | McIntire   | natalie.mcintire@gmail.com     | Wind on the Wires                  | 570 Asbury St Ste 201<br><br>Saint Paul,<br>MN<br>55104-1850               | Electronic Service | No                | OFF_SL_24-200_Official |
| Matthew    | Melewski   | matthew@nokomisenergy.com      | Nokomis Energy LLC & Ole Solar LLC | 2639 Nicollet Ave Ste 200<br><br>Minneapolis,<br>MN<br>55408               | Electronic Service | No                | OFF_SL_24-200_Official |
| Thomas     | Melone     | Thomas.Melone@AllcoUS.com      | Minnesota Go Solar LLC             | 222 South 9th Street<br>Suite 1600<br>Minneapolis,<br>MN<br>55120          | Electronic Service | No                | OFF_SL_24-200_Official |
| Tim        | Mergen     | tmergen@meeker.coop            | Meeker Cooperative Light And Power | 1725 US Hwy 12 E. Suite 100<br><br>PO Box 68<br>Litchfield,<br>MN<br>55355 | Electronic Service | No                | OFF_SL_24-200_Official |
| Joseph     | Meyer      | joseph.c.meyer@state.mn.us     | Office of Administrative Hearings  | PO Box 64620<br><br>St. Paul,<br>MN<br>55164                               | Electronic Service | Yes               | OFF_SL_24-200_Official |
| Pontius    | Mike       | mpontius@mnpower.com           |                                    | N/A  | Electronic Service | No                | OFF_SL_24-200_Official |
| Stacy      | Miller     | stacy.miller@minneapolismn.gov | City of Minneapolis                | 350 S. 5th Street<br>Room M 301<br>Minneapolis,<br>MN<br>55415             | Electronic Service | No                | OFF_SL_24-200_Official |
| Luther     | Miller     | Luther.C.Miller@xcelenergy.com | Xcel Energy                        | N/A  | Electronic Service | No                | OFF_SL_24-200_Official |

| First Name | Last Name   | Email                                | Company Name                         | Address   | Delivery Method    | View Trade Secret | Service List Name      |
|------------|-------------|--------------------------------------|--------------------------------------|---|--------------------|-------------------|------------------------|
| Darrick    | Moe         | darrick@mrea.org                     | Minnesota Rural Electric Association | 11640 73rd Ave N<br>Maple Grove,<br>MN<br>55369                     | Electronic Service | No                | OFF_SL_24-200_Official |
| David      | Moeller     | dmoeller@allete.com                  | Minnesota Power                      | 30 W Superior St<br>Duluth,<br>MN<br>558022093                      | Electronic Service | No                | OFF_SL_24-200_Official |
| Dalene     | Monsebroten | dalene.monsebroten@nmp<br>agency.com | Northern Municipal Power Agency      | 123 2nd St W<br>Thief River Falls,<br>MN<br>56701                   | Electronic Service | No                | OFF_SL_24-200_Official |
| Andrew     | Moratzka    | andrew.moratzka@stoel.co<br>m        | Stoel Rives LLP                      | 33 South Sixth St Ste 4200<br>Minneapolis,<br>MN<br>55402           | Electronic Service | No                | OFF_SL_24-200_Official |
| Sergio     | Navas       | snavas@sundialsolarenerg<br>y.com    | Sundial Energy, LLC                  | 3363 Republic Ave<br>Saint Louis Park,<br>MN<br>55426               | Electronic Service | No                | OFF_SL_24-200_Official |
| Ben        | Nelson      | benn@cmpasgroup.org                  | CMMPA                                | 459 South Grove Street<br>Blue Earth,<br>MN<br>56013                | Electronic Service | No                | OFF_SL_24-200_Official |
| Alex       | Nelson      | ANelson@dakotaelectric.co<br>m       | Dakota Electric Association          | 4300 220nd St<br>Farmington,<br>MN<br>55024                         | Electronic Service | No                | OFF_SL_24-200_Official |
| David      | Niles       | david.niles@avantenergy.c<br>om      | Minnesota Municipal Power Agency     | 220 South Sixth Street<br>Suite 1300<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No                | OFF_SL_24-200_Official |
| Michael    | Noble       | noble@fresh-energy.org               | Fresh Energy                         | 408 Saint Peter St Ste 350<br>Saint Paul,<br>MN<br>55102            | Electronic Service | No                | OFF_SL_24-200_Official |
| Rolf       | Nordstrom   | rnordstrom@gpisd.net                 | Great Plains Institute               | 2801 21ST AVE S STE 220<br>Minneapolis,<br>MN<br>55407-1229         | Electronic Service | No                | OFF_SL_24-200_Official |

| First Name | Last Name | Email                            | Company Name                                  | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|------------|-----------|----------------------------------|---|--|--------------------|-------------------|------------------------|
| Samantha   | Norris    | samanthanorris@alliantenergy.com | Interstate Power and Light Company            | 200 1st Street SE PO Box 351<br><br>Cedar Rapids, IA 524060351 | Electronic Service | No                | OFF_SL_24-200_Official |
| Logan      | O'Grady   | logrady@mnseia.org               | Minnesota Solar Energy Industries Association | 2288 University Ave W<br><br>St. Paul, MN 55114                | Electronic Service | No                | OFF_SL_24-200_Official |
| Timothy    | O'Leary   | toleary@llec.coop                | Lyon-Lincoln Electric Cooperative, Inc        | P.O. Box 639<br><br>Tyler, MN 561780639                        | Electronic Service | No                | OFF_SL_24-200_Official |
| Jeff       | O'Neill   | jeff.oneill@ci.monticello.mn.us  | City of Monticello                            | 505 Walnut Street Suite 1<br>Monticello, MN 55362              | Electronic Service | No                | OFF_SL_24-200_Official |
| Wendi      | Olson     | wolson@otpc.com                  | Otter Tail Power Company                      | 215 South Cascade<br><br>Fergus Falls, MN 56537                | Electronic Service | No                | OFF_SL_24-200_Official |
| Russell    | Olson     | rolson@hcpd.com                  | Heartland Consumers Power District            | PO Box 248<br><br>Madison, SD 570420248                        | Electronic Service | No                | OFF_SL_24-200_Official |
| Bethany    | Owen      | bowen@mnpower.com                | Minnesota Power                               | 30 West Superior Street<br><br>Duluth, MN 55802                | Electronic Service | No                | OFF_SL_24-200_Official |
| Cezar      | Panait    | Cezar.Panait@state.mn.us         | Public Utilities Commission                   | 121 7th Place East Suite 350<br>St. Paul, MN 55101             | Electronic Service | No                | OFF_SL_24-200_Official |
| Dan        | Patry     | dpatry@sunedison.com             | SunEdison                                     | 600 Clipper Drive<br><br>Belmont, CA 94002                     | Electronic Service | No                | OFF_SL_24-200_Official |
| Jeffrey C  | Paulson   | jeff.jcplaw@comcast.net          | Paulson Law Office, Ltd.                      | 4445 W 77th Street Suite 224<br>Edina, MN 55435                | Electronic Service | No                | OFF_SL_24-200_Official |

| First Name     | Last Name                      | Email                                | Company Name                       | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|----------------|--------------------------------|--------------------------------------|------------------------------------|--|--------------------|-------------------|------------------------|
| Dean           | Pawlowski                      | dpawlowski@otpc.com                  | Otter Tail Power Company           | PO Box 496<br>215 S. Cascade St.<br>Fergus Falls,<br>MN<br>565370496         | Electronic Service | No                | OFF_SL_24-200_Official |
| Susan          | Peirce                         | Susan.Peirce@state.mn.us             | Department of Commerce             | 85 Seventh Place East<br><br>St. Paul,<br>MN<br>55101                        | Electronic Service | No                | OFF_SL_24-200_Official |
| Mary Beth      | Peranteau                      | mperanteau@fredlaw.com               | Fredrikson & Byron, P.A.           | 44 East Mifflin Street<br>Suite 1000<br>Madison,<br>WI<br>53703              | Electronic Service | No                | OFF_SL_24-200_Official |
| Wess           | Pfaff                          | wes.pfaff@mrenergy.com               |                                    | N/A  | Electronic Service | No                | OFF_SL_24-200_Official |
| Donna          | Pickard                        | dpickardgsss@gmail.com               | Genie Solar Support Services       | 1215 Lilac Lane<br><br>Excelsior,<br>MN<br>55331                             | Electronic Service | No                | OFF_SL_24-200_Official |
| Crystal        | Pomerleau                      | crystal.r.pomerleau@xcelenergy.com   | Xcel                               | N/A  | Electronic Service | No                | OFF_SL_24-200_Official |
| David G.       | Prazak                         | dprazak@otpc.com                     | Otter Tail Power Company           | P.O. Box 496<br>215 South Cascade Street<br>Fergus Falls,<br>MN<br>565380496 | Electronic Service | No                | OFF_SL_24-200_Official |
| Elizabeth      | Psihos                         | elizabeth.psihos@idealenergies.com   |                                    | N/A  | Electronic Service | No                | OFF_SL_24-200_Official |
| Michael        | Reinertson                     | michael.reinertson@avantenergy.com   | Avant Energy                       | 220 S. Sixth St. Ste 1300<br><br>Minneapolis,<br>MN<br>55402                 | Electronic Service | No                | OFF_SL_24-200_Official |
| John C.        | Reinhardt                      | N/A                                  | Laura A. Reinhardt                 | 3552 26th Ave S<br><br>Minneapolis,<br>MN<br>55406                           | Paper Service      | No                | OFF_SL_24-200_Official |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131           | Electronic Service | Yes               | OFF_SL_24-200_Official |
|                |                                |                                      |                                    |  |                    |                   |                        |

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| Kevin      | Reuther     | kreuther@mncenter.org              | MN Center for Environmental Advocacy  | 26 E Exchange St, Ste 206<br><br>St. Paul, MN<br>551011667     | Electronic Service | No                | OFF_SL_24-200_Official |
| Kristi     | Robinson    | krobinson@star-energy.com          | STAR Energy Services, LLC             | 1401 South Broadway<br><br>Pelican Rapids, MN<br>56572         | Electronic Service | No                | OFF_SL_24-200_Official |
| Daniel     | Rogers      | dan@nokomispartners.com            | Nokomis                               | 2639 Nicollet Ave Ste 200<br><br>Minneapolis, MN<br>55408      | Electronic Service | No                | OFF_SL_24-200_Official |
| Michael    | Ruiz        | michael.ruiz@xcelenergy.com        | Xcel Energy                           | N/A  | Electronic Service | No                | OFF_SL_24-200_Official |
| Darla      | Ruschen     | d.ruschen@bcrea.coop               | Brown County Rural Electric Assn.     | PO Box 529<br>24386 State Highway 4<br>Sleepy Eye, MN<br>56085 | Electronic Service | No                | OFF_SL_24-200_Official |
| Robert K.  | Sahr        | bsahr@eastriver.coop               | East River Electric Power Cooperative | P.O. Box 227<br><br>Madison, SD<br>57042                       | Electronic Service | No                | OFF_SL_24-200_Official |
| Kenric     | Scheevel    | Kenric.scheevel@dairylandpower.com | Dairyland Power Cooperative           | 3200 East Ave S<br>PO Box 817<br>La Crosse, WI<br>54602        | Electronic Service | No                | OFF_SL_24-200_Official |
| Dean       | Schiro      | dean.e.schiro@xcelenergy.com       | Xcel Energy                           | N/A  | Electronic Service | No                | OFF_SL_24-200_Official |
| Jacob J.   | Schlesinger | jschlesinger@keyesfox.com          | Keyes & Fox LLP                       | 1580 Lincoln St Ste 880<br><br>Denver, CO<br>80203             | Electronic Service | No                | OFF_SL_24-200_Official |
| Jeff       | Schoenecker | jschoenecker@dakotaelectric.com    | Dakota Electric Association           | 4300 220th Street W<br><br>Farmington, MN<br>55024             | Electronic Service | No                | OFF_SL_24-200_Official |
| Kay        | Schraeder   | kschraeder@minnkota.com            | Minnkota Power                        | 5301 32nd Ave S<br><br>Grand Forks, ND<br>58201                | Electronic Service | No                | OFF_SL_24-200_Official |

| First Name | Last Name      | Email                             | Company Name                     | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|------------|----------------|-----------------------------------|----------------------------------|--|--------------------|-------------------|------------------------|
| Matthew    | Schuerger      | matthew.schuerger@state.mn.us     | Public Utilities Commission      | 121 7th Place East<br>Suite 350<br>St. Paul,<br>MN<br>55101        | Electronic Service | No                | OFF_SL_24-200_Official |
| Ronald J.  | Schwartau      | rschwartau@noblesce.com           | Nobles Cooperative Electric      | 22636 U.S. Hwy. 59<br><br>Worthington,<br>MN<br>56187              | Electronic Service | No                | OFF_SL_24-200_Official |
| Christine  | Schwartz       | Regulatory.records@xcelenergy.com | Xcel Energy                      | 414 Nicollet Mall FL 7<br><br>Minneapolis,<br>MN<br>554011993      | Electronic Service | No                | OFF_SL_24-200_Official |
| Rob        | Scott Hovland  | rob.scott-hovland@mrenergy.com    | Missouri River Energy Services   | 3724 W Avera Dr<br>PO Box 88920<br>Sioux Falls,<br>SD<br>571098920 | Electronic Service | No                | OFF_SL_24-200_Official |
| Dean       | Sedgwick       | Sedgwick@Itascapower.com          | Itasca Power Company             | PO Box 455<br><br>Spring Lake,<br>MN<br>56680                      | Electronic Service | No                | OFF_SL_24-200_Official |
| Will       | Seuffert       | Will.Seuffert@state.mn.us         | Public Utilities Commission      | 121 7th PI E Ste 350<br><br>Saint Paul,<br>MN<br>55101             | Electronic Service | Yes               | OFF_SL_24-200_Official |
| Janet      | Shaddix Elling | jshaddix@janetshaddix.com         | Shaddix And Associates           | 7400 Lyndale Ave S Ste 190<br><br>Richfield,<br>MN<br>55423        | Electronic Service | Yes               | OFF_SL_24-200_Official |
| Doug       | Shoemaker      | dougs@charter.net                 | Minnesota Renewable Energy       | 2928 5th Ave S<br><br>Minneapolis,<br>MN<br>55408                  | Electronic Service | No                | OFF_SL_24-200_Official |
| Felicia    | Skaggs         | fskaggs@meeker.coop               | Meeker Cooperative Light & Power | 1725 US Highway 12 E<br>Suite 100<br>Litchfield,<br>MN<br>55355    | Electronic Service | No                | OFF_SL_24-200_Official |
| Glen       | Skarbakka      | glen@s-pllc.com                   | Skarbakka PLLC                   | 5411 Bartlett Blvd<br><br>Mound,<br>MN<br>55364                    | Electronic Service | No                | OFF_SL_24-200_Official |



| First Name | Last Name     | Email                             | Company Name                             | Address   | Delivery Method    | View Trade Secret | Service List Name      |
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| Trevor     | Smith         | trevor.smith@avantenergy.com      | Avant Energy, Inc.                       | 220 South Sixth Street<br>Suite 1300<br>Minneapolis,<br>MN<br>55402     | Electronic Service | No                | OFF_SL_24-200_Official |
| Rafi       | Sohail        | rafi.sohail@centerpointenergy.com | CenterPoint Energy                       | 800 LaSalle Avenue<br>P.O. Box 59038<br>Minneapolis,<br>MN<br>554590038 | Electronic Service | No                | OFF_SL_24-200_Official |
| Beth       | Soholt        | bsoholt@cleangridalliance.org     | Clean Grid Alliance                      | 570 Asbury Street Suite<br>201<br><br>St. Paul,<br>MN<br>55104          | Electronic Service | No                | OFF_SL_24-200_Official |
| Marcia     | Solie         | m.solie@bcrea.coop                | Brown County Rural<br>Electrical Assn.   | 24386 State Hwy. 4, PO<br>Box 529<br><br>Sleepy Eye,<br>MN<br>56085     | Electronic Service | No                | OFF_SL_24-200_Official |
| Braden     | Solum         | braden.solum@idealenergies.com    | iDEAL Energies                           | 5810 Nicollet Ave<br><br>Minneapolis,<br>MN<br>55419                    | Electronic Service | No                | OFF_SL_24-200_Official |
| Robyn      | Sonstegard    | robyn.s@northstarelectric.coop    | North Star Electric<br>Cooperative, Inc. | PO BOX 719<br><br>Baudette,<br>MN<br>56623                              | Electronic Service | No                | OFF_SL_24-200_Official |
| Faith      | Spotted Eagle | eagletrax@hotmail.com             |  | PO BOX 667<br><br>Lake Andes,<br>SD<br>557356                           | Electronic Service | No                | OFF_SL_24-200_Official |
| Brandon    | Stamp         | brandon.j.stamp@xcelenergy.com    | Xcel Energy                              | 401 Nicollet Mall<br><br>Minneapolis,<br>MN<br>55401                    | Electronic Service | No                | OFF_SL_24-200_Official |
| Sky        | Stanfield     | stanfield@smwlaw.com              | Shute, Mihaly &<br>Weinberger            | 396 Hayes Street<br><br>San Francisco,<br>CA<br>94102                   | Electronic Service | No                | OFF_SL_24-200_Official |
|            |               |                                   |  |   |                    |                   |                        |

| First Name    | Last Name | Email                             | Company Name                    | Address   | Delivery Method    | View Trade Secret | Service List Name      |
|---------------|-----------|-----------------------------------|---------------------------------|---|--------------------|-------------------|------------------------|
| Kristin       | Stastny   | kstastny@taftlaw.com              | Taft Stettinius & Hollister LLP | 2200 IDS Center<br>80 South 8th St<br>Minneapolis,<br>MN<br>55402         | Electronic Service | No                | OFF_SL_24-200_Official |
| Sherry        | Swanson   | sswanson@noblesce.com             | Nobles Cooperative Electric     | 22636 US Highway 59<br>PO Box 788<br>Worthington,<br>MN<br>56187          | Electronic Service | No                | OFF_SL_24-200_Official |
| Eric          | Swanson   | eswanson@winthrop.com             | Winthrop & Weinstine            | 225 S 6th St Ste 3500<br>Capella Tower<br>Minneapolis,<br>MN<br>554024629 | Electronic Service | No                | OFF_SL_24-200_Official |
| Bryant        | Tauer     | btauer@whe.org                    | Wright-Hennepin                 | 6800 Electric Dr<br><br>Rockford,<br>MN<br>55373                          | Electronic Service | No                | OFF_SL_24-200_Official |
| Emma Marshall | Torres    | emarshall-torres@convergentep.com |                                 | N/A   | Electronic Service | No                | OFF_SL_24-200_Official |
| Pat           | Treseler  | pat.jcplaw@comcast.net            | Paulson Law Office LTD          | 4445 W 77th Street<br>Suite 224<br>Edina,<br>MN<br>55435                  | Electronic Service | No                | OFF_SL_24-200_Official |
| Jeff          | Triplett  | triplettj@powersystem.org         | MREA                            | 10710 Town Square Dr NW<br>St 201<br><br>Minneapolis,<br>MN<br>55449      | Electronic Service | No                | OFF_SL_24-200_Official |
| Adam          | Tromblay  | atromblay@noblesce.com            | Nobles Cooperative Electric     | 22636 US Hwy. 59<br>P.O. Box 788<br>Worthington,<br>MN<br>56187-0788      | Electronic Service | No                | OFF_SL_24-200_Official |
| Lise          | Trudeau   | lise.trudeau@state.mn.us          | Department of Commerce          | 85 7th Place East<br>Suite 500<br>Saint Paul,<br>MN<br>55101              | Electronic Service | No                | OFF_SL_24-200_Official |
| Alan          | Urban     | alan.m.urban@xcelenergy.com       | Xcel Energy                     | N/A   | Electronic Service | No                | OFF_SL_24-200_Official |
|               |           |                                   |                                 |   |                    |                   |                        |

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|------------|------------|--------------------------------------|---|--|--------------------|-------------------|------------------------|
| Ellen      | Veazey     | lveazey@solarunitedneighbors.org     | Solar United Neighbors                        | 1350 Connecticut Ave NW<br>Ste 412<br><br>Washington,<br>DC<br>20036 | Electronic Service | No                | OFF_SL_24-200_Official |
| Sam        | Villella   | sdvillella@gmail.com                 |   | 10534 Alamo Street NE<br><br>Blaine,<br>MN<br>55449                  | Electronic Service | No                | OFF_SL_24-200_Official |
| Wendy      | Vorasane   | wendy.vorasane@idealenergy.com       |   | N/A  | Electronic Service | No                | OFF_SL_24-200_Official |
| Sarah      | Walinga    | swalinga@solarcity.com               | Energy Freedom Coalition                      | 3055 Clearview Way<br><br>San Mateo,<br>MN<br>94402                  | Electronic Service | No                | OFF_SL_24-200_Official |
| Robert     | Walsh      | bwalsh@mnvalleyrec.com               | Minnesota Valley Coop<br>Light and Power      | PO Box 248<br>501 S 1st St<br>Montevideo,<br>MN<br>56265             | Electronic Service | No                | OFF_SL_24-200_Official |
| Roger      | Warehime   | roger.warehime@owatonnautilities.com | Owatonna Municipal Public<br>Utilities        | 208 S Walnut Ave<br>PO BOX 800<br>Owatonna,<br>MN<br>55060           | Electronic Service | No                | OFF_SL_24-200_Official |
| Jenna      | Warmuth    | jwarmuth@mnpower.com                 | Minnesota Power                               | 30 W Superior St<br><br>Duluth,<br>MN<br>55802-2093                  | Electronic Service | No                | OFF_SL_24-200_Official |
| Samantha   | Weaver     | samantha@communitysolaraccess.org    | Coalition for Community<br>Solar Access       | 1380 Monroe St.<br><br>Washington DC,<br>DC<br>20010                 | Electronic Service | No                | OFF_SL_24-200_Official |
| Elizabeth  | Wefel      | eawefel@flahertyhood.com             | Flaherty & Hood, P.A.                         | 525 Park St Ste 470<br><br>Saint Paul,<br>MN<br>55103                | Electronic Service | No                | OFF_SL_24-200_Official |
| John       | Williamson | John.Williamson@state.mn.us          | Minnesota Department of<br>Labor and Industry | 443 Lafayette Rd N<br><br>St. Paul,<br>MN<br>55155-4341              | Electronic Service | No                | OFF_SL_24-200_Official |

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| Danielle   | Winner    | danielle.winner@state.mn.us   | Department of Commerce             | 85 7th Place East<br>Suite 500<br>Saint Paul,<br>MN<br>55101                | Electronic Service | No                | OFF_SL_24-200_Official |
| Robyn      | Woeste    | robynwoeste@alliantenergy.com | Interstate Power and Light Company | 200 First St SE<br><br>Cedar Rapids,<br>IA<br>52401                         | Electronic Service | No                | OFF_SL_24-200_Official |
| Terry      | Wolf      | terry.wolf@mrenergy.com       | Missouri River Energy Services     | 3724 W Avera Dr<br>PO Box<br>Sioux Falls,<br>SD<br>571098920                | Electronic Service | No                | OFF_SL_24-200_Official |
| Brian      | Zavesky   | brianz@mrenergy.com           | Missouri River Energy Services     | 3724 West Avera Drive<br>P.O. Box 88920<br>Sioux Falls,<br>SD<br>57108-8920 | Electronic Service | No                | OFF_SL_24-200_Official |