

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



May 31, 2017

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

**PUBLIC DOCUMENT - NOT  
PUBLIC (OR PRIVILEGED) DATA HAS  
BEEN EXCISED**

**RE: In the Matter of Utilities' Annual Reports on Progress in Achieving the Solar Energy Standard  
Docket Number E999/M-17-283**

Dear Mr. Wolf:

In response to the Minnesota Public Utilities Commission Notice issued April 14, 2017 in above described matter, Otter Tail Power Company hereby submits its Solar Energy Standard Report.

Portions of the enclosed Report are marked "PROTECTED DATA" because those portions contain information Otter Tail considers to be trade secret data under Minn. Stat. §13.37(1)(b). This information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use. Otter Tail has taken reasonable efforts to maintain the secrecy of the information marked as TRADE SECRET. Specifically, the trade secret information contains detailed information regarding identities and kWh consumption of customers excluded from the Solar Energy Standard. As stated in the report, nine customers have been exempted under 216B.1691, subd. 2f(d)(1) and (2).

This filing has been served on all persons on the attached service list by electronic service or by First Class mail. A Certificate of Service is also enclosed.

Should you have any questions, please contact me at [bhdraxten@otpc.com](mailto:bhdraxten@otpc.com) or (218) 739-8417.

Sincerely,

*/s/ BRIAN DRAXTEN*  
Brian Draxten  
Manager Resource Planning

jch  
Enclosures  
By Electronic filing  
c: Service List

*An Equal Opportunity Employer*

# Solar Energy Standard Annual Report

Due: June 1, 2017  
Reporting period: January 1, 2016 – December 31, 2016  
Statute/Rule reference: [216B.1691 Subd. 2f\(g\)](#).  
 (g) Beginning July 1, 2014, and each July 1 through 2020, each public utility shall file a report with the commission reporting its progress in achieving the solar energy standard established under this subdivision.  
 Order, issued April 25 in Docket No. E999/CI-13-542  
 Order, issued October 23, 2014 in Docket No. E999/M-14-321  
 Order, issued November 28, 2016 in Docket No. E999/M-16-342  
Comments: Please answer questions below and eFile as a PDF

Report Year	2016
Date Submitted	
<b>Filing Utility Information</b>	
Company ID#	87
Company Name	Otter Tail Power Company
Street Address Line 1	215 South Cascade Street
Street Address Line 2	PO 496
City	Fergus Falls
State	MN
Zip Code	56537
<b>Contact Information</b>	
Contact Name	Carol Westergard
Contact Title	Contract & Due Diligence Administrator
Contact Telephone	218-739-8883
Contact Email	cwestergard@otpc.com
<b>Comments/Notes</b>	

<b>Minnesota Public Utilities Commission</b>			
<b>INFORMATION DOCKET E999/M-17-283</b>	<b>Reporting Period:</b>	<b>January 1, 2016 - December 31, 2016</b>	
<b>Solar Energy Standard Annual Report</b>	<b>Utility:</b>	<b>Otter Tail Power Company</b>	
<b>Report Year:</b>	2016	<b>Date Submitted:</b>	

<b>Annual Minnesota retail sales for the reporting year</b>	
Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Points 4.A & 4.B	
1. Annual MN retail sales for the reporting year	2,545,813
2. Annual Excluded customer sales for the reporting year	66,181
3. Annual Minnesota retail sales less exclusions	2,479,632

<b>Customer requesting exclusion from the SES that have been approved by the utility</b>			
Docket Nos. E999/CI-13-542, E999/M-14-321, Commission Order (October 23, 2014), Order Point 2.a			
Customer Name	Premise	NAICS	Annual kWh Usage
[PROTECTED DATA BEGINS...]			
<b>Total MN Sales for Excluded Customers</b>			<b>66,181,241</b>

<b>Minnesota Public Utilities Commission</b>			
<b>INFORMATION DOCKET E999/M-17-283</b>	<b>Reporting Period:</b>	<b>January 1, 2016 - December 31, 2016</b>	
<b>Solar Energy Standard Annual Report</b>	<b>Utility:</b>	<b>Otter Tail Power Company</b>	
Report Year:	2016	Date Submitted:	

<b>Solar generation on the utilities' system during the reporting period</b>					
Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Point 4.E					
	Number of Facilities on Utility System	Capacity	Number registered in M-RETS	Capacity registered in M-RETS	SRECs Generated
Less than 20kW	21	149.5	1	11	6
Greater than 20kW	7	162.7	0	0	0

<b>Estimated amount of solar generation a utility would be required to obtain in 2020</b>		
Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Points 4.F & 4.G		
	Capacity (MW)	SRECs (MWh)
Entire 1.5% Standard	30 MW	40,000 MWh

				Year End Balance
				0
				0
a. Receiving an incentive (any type)	0	0	0	0
b. Not receiving an incentive	0	0	0	0
4. Community Solar Gardens (VOS)				
a. Receiving an incentive (any type)	0	0	0	0
b. Not receiving an incentive	0	0	0	0
5. Facilities receiving a VOS rate (not included above)	0	0	0	0
6. Facilities under a net metering tariff				
a. Receiving an incentive (any type)	0	0	0	0
b. Not receiving an incentive	12	6	0	18
7. Facilities receiving an incentive (not included above)	0	0	0	0
8. Facilities that do not fall into any other category	0	0	0	0
<b>Total</b>	<b>12</b>	<b>6</b>		<b>18</b>

<b>Purchases and sales of S-RECS to meet the SES</b>		
Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Point 4.K		
	SRECs Purchased	SRECs Sold
SES (>20kW)	0	0
Small Scale Carve Out (<20kW)	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

<b>Minnesota Public Utilities Commission</b>			
<b>INFORMATION DOCKET E999/M-17-283</b>		<b>Reporting Period:</b>	<b>January 1, 2016 - December 31, 2016</b>
<b>Solar Energy Standard Annual Report</b>		<b>Utility:</b>	<b>Otter Tail Power Company</b>
Report Year:	2016	Date Submitted:	

**Additional information supporting assumed capacity factor, effective load carrying capability, and MISO capacity accreditation for existing or planned solar facilities**

Docket Nos. E999/CI-13-542, E999/M-14-321, Commission Order (October 23, 2014), Order Points 2.b & 2.d

Solar Project	Nameplate (MW)	Capacity Factor	Capacity Accreditation	Project Status

**Information on Assumed Capacity Factor**

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**Information on effective load carrying capability and MISO Capacity Accreditation**

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1. **Summary of ongoing efforts to obtain solar energy (including a brief summary of the anticipated mix of project sizes for SES compliance)** *Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Point 4.H*  
**More detailed information on each utility's ongoing efforts to obtain solar energy on their systems.** *Docket Nos. E999/CI-13-542, E999/M-14-321, Commission Order (October 23, 2014), Order Point 2.c*

Otter Tail Power Company (the "Company" or "Otter Tail") has had discussions with various solar developers about projects that could be in operation prior to the end of 2019 to utilize the 30% ITC and be operational in advance of the 2020 MN SES obligation. To take advantage of economies of scale, the Company has been focused on single projects (20 MW to 30 MW in size) to meet the utility scale portion of the SES. The installed cost of solar projects continues drop and technology continues to improve solar net capacity factors which reduces the overall cost of solar energy. At this time, even with the reduced cost of solar energy, solar resources may not be viewed as a least cost resource in all the jurisdictions the Company serves. Otter Tail intends to continue to operate as one integrated system with one resource mix. The Company may pursue purchasing Solar Renewable Energy Credits (SRECs) to comply with the SES as a bridge until solar energy can be a least cost resource in all the jurisdictions the Company serves.

2. **Progress towards the 10% carve out for systems less than 20 kW, including whether they plan to meet it through customer sited generation or SREC purchases.** *Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Point 4.I*

Otter Tail's research covering residential and commercial solar PV market potential indicates that meeting the ten percent carve out by 2020 will be a challenge for the Company and its customers. The Company continues to evaluate strategies to meet the ten percent carve out for systems less than 20 kW in size. The Company believes that multiple approaches and programs will need to be implemented to meet the ten percent carve out by 2020. The Company's objective is to meet this standard as cost effectively as possible while minimizing upward pressure on customer rates and cross subsidization between different classes of ratepayers. The Company is monitoring forecasts from numerous sources in the solar industry indicating a continued decline in costs of solar PV systems.

In 2016, Otter Tail received approval to its 2016 Conservation Improvement Program (CIP) to include incentives for Publically Owned Property Solar (POP Solar) projects. The POP Solar program shares benefits of solar with all members of the community, university, public school, tribal properties, or other public owned properties. Recently Otter Tail worked with a university

to install the first POP Solar facility, a 20 kW solar PV system. Otter Tail and the university formed a partnership to use the 20 kW solar PV system to promote educational opportunities on the campus and throughout the community. Developing this project has helped Otter Tail recognize the need for additional community solar education opportunities. Otter Tail has recently approved several POP Solar applications, including one for an elementary school, which will likely be constructed in the summer of 2017.

In addition to the POP Solar program in CIP, Otter Tail has researched many strategies to meet the solar carve out, including (a) a utility-scale solar PV project with customer subscriptions to generation benefits, (b) building several Company-owned small solar facilities, (c) purchasing small-scale SRECs through the Midwest Renewable Tracking System (M-RETS), and (d) Otter Tail administering its own solar incentive program outside of CIP.

Otter Tail is hopeful legislation will be passed allowing up to 40 kilowatt solar facilities to count towards the small-scale requirement. Some of the Made in Minnesota funding is going towards larger than 20 kilowatt systems, which limits the funds available for the smaller systems. Allowing up to 40 kilowatt systems be eligible towards the small-scale requirement will be helpful in meeting the ten percent carve out and will be consistent with Minnesota rules that apply to the current Net Energy Billing rates.

Outside of a significant change to statutory eligibility rules, Otter Tail will most likely not meet the ten percent small scale carve out requirement with customer-owned or Company-owned systems in 2020. Otter Tail most likely will rely on purchasing SRECs from small solar facilities registered in M-RETS. The Company is currently investigating the availability of these SRECs and the potential costs. The Company anticipates that next year's SES report will have greater detail on the expected mix of projects registered in M-RETS, potential for purchasing SRECs and further plans to meet the SES requirements.

**3. Discussion on challenges in registering small solar facilities in M-RETS.** *Docket Nos. E999/CI-13-542, E999/M-14-321, Commission Order (October 23, 2014), Order Point 2.e*

Currently Otter Tail has one small solar facility registered in M-RETS. Otter Tail is installing production metering on all small solar facilities, to ensure their production can be registered in M-RETS. The Company is currently working with M-RETS to aggregate all its small systems so

their production can be registered accordingly. The Company is also investigating the availability of purchasing SRECs and the potential costs of SRECs in M-RETS.

4. **Brief summary of the state(s) in which the solar generation is located or anticipated to be located.** *Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Point 4.J*

For customer-owned and Company-owned solar generating facilities or purchased power agreement (PPA) facilities, the Company expects those facilities to be located within the three states the Company serves (Minnesota, North Dakota and South Dakota). If SREC procurement proves to be a component of a cost effective means to meet the SES, then the solar facilities could be located outside of the three states the company serves.

5. **Discussion of how utilities plan to use the current solar investment tax credit (ITC) benefits to lower solar costs, and if not, why they believe that waiting may reduce the costs of adding solar resources. Include details on the risks of higher compliance costs to customers if solar prices were not to fall and the ITC expires, and the uncertainty of Midwest SREC market prices and availability if procurement was necessary for compliance with the Standard.**

*Docket Nos. E999/CI-13-542, E999/M-14-321, Commission Order (October 23, 2014), Order Point 2.f*

The current legislation pertaining to solar tax credits and IRS guidance related to the ‘step-down’ of the ITC from the current 30% to 10% are shown in the table below.

Construction start by	COD by year end	ITC percentage
EOY 2019	2021	30%
2020	2022	26%
2021	2023	22%
After 2021		10%

For Company owned solar projects, the ITC would be included as part of the rate-making process to the benefit of our customers. For PPAs, the ITC benefit would be reflected in the PPA price. Solar projects that start construction by the end of 2019 and reach Commercial Operation Date (COD) by the end of 2021 would be eligible for the full 30% ITC

6. **Discussion on the utilities’ efforts to reach, by 2030, the energy goal that ten percent of the retail electric sales in Minnesota be generated by solar energy.** *Docket Nos. E999/CI-13-542, E999/M-16-342, Commission Order (November 28, 2016)*



As the cost of solar energy continues to drop, the Company anticipates that solar energy will play a larger role in its resource mix. Otter Tail intends to continue to operate as one integrated system with one resource mix. The company intends to provide an evaluation of the 10% solar energy goal in its next integrated resource plan to be filed in 2019.

**7. Any additional comments or materials the utility may wish to include.**

## CERTIFICATE OF SERVICE

**RE: In the Matter of Utilities' Annual Reports on Progress in Achieving the Solar  
Energy Standard  
Docket Number E999/M-17-283**

I, Jana C. Hrdlicka, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf and Sharon Ferguson by e-filing, and to all other persons on the attached service lists by electronic service or by first class mail.

**Otter Tail Power Company  
Report**

Dated this **31st** day of **May, 2017**.

/s/ JANA HRDLICKA

Jana Hrdlicka  
Regulatory Filing Coordinator  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls MN 56537  
(218) 739-8879

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211  Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_17-283_Official
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_17-283_Official
John	Aune	johna@bluehorizonsolar.com	Blue Horizon Energy	171 Cheshire Ln Ste 500  Plymouth, MN 55441	Electronic Service	No	OFF_SL_17-283_Official
Peter	Beithon	pbeithon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_17-283_Official
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-283_Official
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-283_Official
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-283_Official
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-283_Official
Joel	Cannon	jcannon@tenksolar.com	Tenk Solar, Inc.	9549 Penn Avenue S  Bloomington, MN 55431	Electronic Service	No	OFF_SL_17-283_Official
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St.  Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_17-283_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_17-283_Official
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_17-283_Official
Bill	Grant	Bill.Grant@state.mn.us	Minnesota Department of Commerce	85 7th Place East, Suite 500  St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-283_Official
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_17-283_Official
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_17-283_Official
Sam	Hanson	shanson@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 South Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-283_Official
Jack	Hays	jack.hays@westwoodps.com	Westwood Professional Services	7699 Anagram Drive  Eden Prairie, MN 55344	Electronic Service	No	OFF_SL_17-283_Official
Brandon	Heath	bheath@misoenergy.org	MISO Energy	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	OFF_SL_17-283_Official
Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-283_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_17-283_Official
Dwight	Jelle	dkjelle@gmail.com	Best Power International, LLC	P.O. 5126  Hopkins, MN 55343	Electronic Service	No	OFF_SL_17-283_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_17-283_Official
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street  St. Paul, MN 551012134	Electronic Service	No	OFF_SL_17-283_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-283_Official
John	Kearney	jmkearney@MnSEIA.org	MnSEIA	2512 33rd Ave S  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_17-283_Official
Mara	Koeller	mara.n.koeller@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-283_Official
Jon	Kramer	sundialjon@gmail.com	Sundial Solar	3209 W 76th St  Edina, MN 55435	Electronic Service	No	OFF_SL_17-283_Official
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-283_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Amy	Liberkowski	amy.a.liberkowski@xcenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-283_Official
Bob	Long	rlong@larkinhoffman.com	Larkin Hoffman (Silicon Energy)	1500 Wells Fargo Plaza 7900 Xerxes Ave S Bloomington, MN 55431	Electronic Service	No	OFF_SL_17-283_Official
Paula	Maccabee	Pmaccabee@justchangela w.com	Just Change Law Offices	1961 Selby Ave  Saint Paul, MN 55104	Electronic Service	No	OFF_SL_17-283_Official
Susan	Mackenzie	susan.mackenzie@state.mn.us	Public Utilities Commission	121 7th Place E Ste 350  St. Paul, MN 551012147	Electronic Service	No	OFF_SL_17-283_Official
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_17-283_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_17-283_Official
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201  Saint Paul, MN 55104-1850	Electronic Service	No	OFF_SL_17-283_Official
Stacy	Miller	stacy.miller@state.mn.us	Department of Commerce	State Energy Office 85 7th Place East, Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-283_Official
Herbert	Minke	hminke@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_17-283_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_17-283_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	andrew.moratzka@stoel.com	Steel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-283_Official
Martin	Morud	mmorud@trunorthsolar.com	Tru North Solar	5115 45th Ave S Minneapolis, MN 55417	Electronic Service	No	OFF_SL_17-283_Official
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_17-283_Official
Rolf	Nordstrom	rnordstrom@gpsid.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_17-283_Official
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_17-283_Official
Kate	O'Connell	kate.oconnell@state.mn.us	Department of Commerce	Suite 50085 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_17-283_Official
Donna	Pickard	dpickardgsss@gmail.com	Genie Solar Support Services	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	OFF_SL_17-283_Official
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_17-283_Official
Enio	Ricci	ericci@invenergyllc.com	Invenergy LLC	17830 New Hampshire Ave Ste 300 Ashton, MD 20861	Electronic Service	No	OFF_SL_17-283_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-283_Official
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390  St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-283_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	OFF_SL_17-283_Official
David	Shaffer	DShaffer@MnSEIA.org	Minnesota Solar Energy Industries Project	1005 Fairmount Ave  Saint Paul, MN 55105	Electronic Service	No	OFF_SL_17-283_Official
Gary	Shaver	gshaver@silicon-energy.com	Silicon Energy	3506 124th St NE  Marysville, WA 98271	Electronic Service	No	OFF_SL_17-283_Official
Erin	Shea	eshea@silicon-energy.com	Silicon Energy	PO Box 376 8787 Silicon Way Mt Iron, MN 55768	Electronic Service	No	OFF_SL_17-283_Official
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Ave S  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_17-283_Official
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2  San Francisco, California 94105	Electronic Service	No	OFF_SL_17-283_Official
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-283_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Deb	Sundin	deb.sundin@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-283_Official
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_17-283_Official
Cam	Winton	cwinton@mnychamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_17-283_Official
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_17-283_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_17-283_Official