



414 Nicollet Mall
Minneapolis, MN 55401

June 20, 2025

—Via Electronic Filing—

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

RE: INITIAL COMMENTS

IN THE MATTER OF IMPLEMENTATION OF 2023 LEGISLATIVE CHANGES TO
NORTHERN STATES POWER CO. D/B/A XCEL ENERGY'S COMMUNITY SOLAR
GARDEN PROGRAM
DOCKET Nos. E002/CI-23-335 & E002/M-13-867

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Initial Comments as requested by the Minnesota Public Utilities Commission in its Notice of Comment Period, issued in the above referenced dockets on April 4, 2025.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Kristen Ruud at 612-216-7979 or kristen.s.ruud@xcelenergy.com or contact me at 612-216-7972 or jessica.k.peterson@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

Jessica Peterson
Manager, Program Policy

Enclosures
cc: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Hwikwon Ham
Audrey C. Partridge
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

IN THE MATTER OF IMPLEMENTATION
OF 2023 LEGISLATIVE CHANGES TO
NORTHERN STATES POWER CO. D/B/A
XCEL ENERGY'S CSG PROGRAM

DOCKET Nos. E002/CI-23-335 &
E002/M-13-867

INITIAL COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Initial Comments as requested by the Minnesota Public Utilities Commission in its Notice of Comment Period, issued in the above referenced dockets on April 4, 2025.

The Commission's Notice relates to the Company's December 19, 2024 Petition to increase the participation fee for the Legacy community solar garden (CSG) program and the Low-to-Moderate Income (LMI) Accessible CSG program to recover administrative costs. The Company requested to increase the participation fee from \$500 per MW to \$800 per MW, prorated by project size and assessed to CSG Subscriber organizations (or developers), to be applied beginning in February 2026. The Notice also separately addresses the application fee for the LMI CSG program.

The Notice requested a Response from the Company addressing specified issues, which the Company filed on May 5. The Notice also requested Initial Comments on the following topics:

- Should the Commission approve Xcel Energy's request to increase the annual participation fee for the Legacy CSG program and the LMI CSG program from \$500 per MW to \$800 per MW prorated by project size, to be applied beginning in February 2026, for recovery of program costs assessed by the Department of Commerce?

- Should the Commission approve a future process of updating the annual participation fee at least every two years through a motion filed in the above referenced dockets?
- Is the initially determined application fee for the LMI CSG program of \$4,125 per MW reasonable for Xcel Energy to assess to recover actual costs?
- If not, is a refund necessary to cover the over collection of the LMI CSG application fees?
- Are there other issues or concerns related to this matter?

The Company responds to these questions below.

COMMENTS

I. 2026 PARTICIPATION FEE INCREASE

Should the Commission approve Xcel Energy's request to increase the annual participation fee for the Legacy CSG program and the LMI CSG program from \$500 per MW to \$800 per MW prorated by project size, to be applied beginning in February 2026, for recovery of program costs assessed by the Department of Commerce?

The Commission should approve a participation fee that covers the cost of administering the Legacy and LMI CSG programs. The 2025 Legislation passed Senate Bill S.F. No. 2, on June 9, 2025. The Governor signed it into law on June 14, 2025. Under this law, for fiscal years ending June 30, 2026 and June 30, 2027, the amount of \$961,000 each year is to be assessed by the Department on Xcel Energy to cover Department activities required under Minn. Stat. §216B.164. These costs were not accounted for in our original Petition and the costs of administering these programs have therefore increased above what we had noted in our Petition.

The Company provides as Attachment A an updated tracker to account for the ongoing costs for calculating the participation fee, including the additional \$1.8 million of administrative costs accessed by the 2025 legislation. As a result, we must modify our request from \$500 per MW to \$1,200 per MW to cover these additional costs. Even with increasing the participation fee to \$1,200 per MW beginning in 2026, we currently show a cumulative shortfall in cost recovery of \$224,969 through 2029. However, there are also several unknowns impacting the final participation fee calculation, including the future amount of user licensing fees required for the SalesForce system (or the portal used for developers to manage their subscriptions).

As the Company must recover the costs of these legislative assessments, we are assessing them to the cost causer as a CSG participation fee; alternatively, the assessment would need to be charged to all customers, whether they choose to participate in the CSG program or not.

II. FUTURE PROCESS FOR UPDATING THE PARTICIPATION FEE

Should the Commission approve a future process of updating the annual participation fee at least every two years through a motion filed in the above referenced dockets?

Yes. To reduce potential shortfalls and/or overages, we need a process by which we can adjust the participation fee accordingly. For instance, if legislation is once again updated to include future appropriation of funds to the Department, those costs should be accounted for in future participation fee calculations. In addition, if the Company collects more fees than anticipated (or has less costs), those factors should also be accounted for and where appropriate can be reflected through a lowered participation fee.

The Company proposes to review the five-year recovery forecast at least every two years and change the participation fee accordingly. This allows the Company to account for the factors identified above after they have been quantified. In addition, the Company requests that the Commission allow a process where proposed changes to the CSG participation fee can be made through a motion filing under Minn. R. 7829.0410.

We believe that this process revision would allow for a more efficient and timelier implementation of any such proposed fee changes that the Commission may approve. This process would still allow commenting parties to express their written views on any such proposed change. The primary procedural differences between filing a petition with proposed changes and filing a motion with similar proposed changes is that the petition process typically takes six months or longer and has a procedural schedule for comments based on a notice issued by the Commission, including initial and reply comments. A motion under Minn. R. 7829.0410, on the other hand, by rule has a procedural schedule allowing for written opposition to the motion to be filed within 14 days of the service of the motion and does not specifically provide for reply comments.

III. LMI CSG APPLICATION FEE AMOUNT & REFUND

Is the initially determined application fee for the LMI CSG program of \$4,125 per MW reasonable for Xcel Energy to assess to recover actual costs? If not, is a refund necessary to cover the over collection of the LMI CSG application fees?

Yes. As described in our May 5, 2025 Response, our actual cost of \$3.8 million for additional application portal work, integration of SalesForce with our billing system, and implementation of consolidated billing is more than the \$3.2 million estimated in our August 28, 2023 filing.¹ The Company's current application fee was based on a projected cost of \$3.2 million. This difference in costs to be recovered through the application fee is mainly due to two factors: first, accelerating the timeframe for consolidated billing implementation from our requested January 2026 date to January 2025, which required additional resources and staff to conduct the expedited work necessary for implementation; and, second additional unforeseen complications with integrating subscriber requirements within our billing system.

In addition, the Company acknowledged that the full IT cost associated with consolidated billing was included as part of our 2025 Multiyear Rate Plan² as a capital project. These costs can be found in the Direct Testimony of Company witness Megan N. Scheller in Exhibit____(MNS-1), Schedule 2, pg. 20 (ITC-Solar Garden Portal SW MN) as part of Enhanced Capabilities.

The Company intends to update the other revenue forecast in Rebuttal Testimony in the rate case to align with the latest approved fee structure as determined by the Commission in this matter. This accounting treatment ensures that the Company recovers the cost of this project and that there will be no double recovery, but also ensures the cost is paid (over time) by the cost-causers. This is a standard process for handling other revenue, such as the revenue associated with pole attachments.

As described in our May 5, 2025 Response, by April 2025 the Company had assessed \$335,569 in LMI CSG application fees. We anticipated that by the end of 2033, if the program capacity is fully allocated in each year, there would still be a \$556,266 shortfall in recovering the system costs described above through the current \$4,125 application fee per MW. Regardless, the Company is not proposing to increase the application fee at this time. We believe it is clear, however, that there has not been any over-collection of the application fee and that the fee amount should not be reduced.

¹ See Xcel Energy Response, Docket No. E002/CI-23-335, August 28, 2023.

<https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId=%7bF05E408A-0000-CB10-8F39-414711965AD8%7d&documentTitle=20238-198558-01>

² See Docket No. E002/GR-24-320.

IV. OTHER ISSUES OR CONCERNS RELATED TO THIS MATTER

The Company does not have any further concerns as it relates to this matter.

CONCLUSION

The Company appreciates the opportunity to provide these Initial Comments in response to the Commission's Notice. We continue to believe our request for recovering CSG program administration and system costs through the participation fee and application fee is necessary and reasonable.

The Company respectfully requests the Commission:

- Approve our updated request, and the associated tariffs, to increase the participation fee for the Legacy CSG program and the LMI CSG program from \$500 per MW to \$1,200 per MW prorated by project size, to be applied beginning in February 2026.
- Approve a future process of reviewing the participation fee at least every two years through a motion filed under Minn. R. 7829.0410 in the instant dockets.
- Keep the current LMI CSG program application fee at \$4,125 per MW.

Dated: June 20, 2025

Northern States Power Company

Community Solar Cost Allocation

Attachment A- Allocation Tracker

Data as of April 2025 w/ 2024 Actual including additional Department Fees

Participation Fees						
	2024	2025	2026	2027	2028	2029
<u>EXPENSES</u>	<i>Actual</i>	<i>Forecast</i>	<i>Forecast</i>	<i>Forecast</i>	<i>Forecast</i>	<i>Forecast</i>
1. Beginning Balance	\$ -	\$ 745,931	\$ 1,762,613	\$ 1,983,847	\$ 2,161,783	\$ 1,247,020
2. <i>Participation Fees</i>						
2a. Department of Commerce ¹	\$ 961,000	\$ 961,000	\$ 961,000	\$ 961,000	\$ 31,096	\$ 31,659
2b. Annual Marketing ²	\$ -	\$ 30,000	\$ 30,543	\$ 31,096	\$ 31,659	\$ 32,232
2c. IT/Billing Annual	\$ 27,384	\$ 250,000	\$ 203,620	\$ 210,584	\$ 217,786	\$ 225,234
2c. SalesForce Participation Fees ³	\$ 147,312	\$ 118,080	\$ 148,230	\$ 148,230	\$ 148,230	\$ 148,230
3. Subscriber Management ⁴	\$ 92,234	\$ 124,000	\$ 128,241	\$ 132,627	\$ 137,162	\$ 141,853
3. Total Expenses (Lines 1+2a+2b+2c)	\$ 1,227,931	\$ 1,483,080	\$ 1,471,634	\$ 1,483,536	\$ 534,837	\$ 547,549
RECOVERY						
4. Total Allocated MW (Legacy+AMI) ⁵	903	933	1,042	1,088	1,208	1,308
5. Participation Fee per MW ⁶	500	500	1,200	1,200	1,200	1,200
6. Total Collected (Lines 4x5) ⁷	\$ 482,000	\$ 466,398	\$ 1,250,400	\$ 1,305,600	\$ 1,449,600	\$ 1,569,600
End of Year Balance (Lines 3-6)	\$ 745,931	\$ 1,762,613	\$ 1,983,847	\$ 2,161,783	\$ 1,247,020	\$ 224,969

Yearly Participation Fee	
Current	\$ 500.00
Proposed	\$ 1,200.00

Notes:

1. 2023 Minnesota Legislation in Chapter 60, Article 10, Section 2, Subd. 2(y). Funding is for a two year period as identified; the Company believes these will continue through the life of the program but have not included at this time. Additional funding found in S.F.2 in 2025.

2. Marketing includes direct mail details regarding bill credits. We anticipate that with the new LMI program these will increase as more residential customers will be receive bill credits.

3. Based on negotiated rates.

4. Contract Labor specific for subscriber management estimating an increase in head count in 2025.

5. Estimated based on year's prior completed projects (so 2024 shows 2023 completion for 2024 participation fees)

Estimated Inflation Rates

Labor Inflation rate	3.42%
Non-labor inflation rate	1.81%
Weighted inflation rate	2.45%

6. 2024 participation fees were \$500 per project and not prorated by MW. There were 964 projects charged in 2024.

7. 2025 represents the actual amount that should have been charged for participation fees. Actual amount equals \$647,957; \$181,559 is being refunded to developers.

CERTIFICATE OF SERVICE

I, Marie Horner, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

- xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota
- xx electronic filing

DOCKET Nos. E002/CI-23-335 AND E002/M-13-867

Dated this 20th day of June 2025

/s/

Marie Horner
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Daniel	Abelson	daniel.abelson@metc.state.mn.us	Metropolitan Council		390 Robert Street N. St. Paul MN, 55101 United States	Electronic Service		No	13-867Official
2	Michael	Allen	michael.allen@allenenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	13-867Official
3	David	Assaf	daassaf@flaherty-hood.com	Flaherty & Hood, P.A.		525 Park Street Suite 470 St. Paul MN, 55102 United States	Electronic Service		No	13-867Official
4	Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	13-867Official
5	Ingrid	Bjorklund	ibjorklund@avisenlegal.com	Avisen Legal		901 S. Marquette Ave. #1675 Minneapolis MN, 55402 United States	Electronic Service		No	13-867Official
6	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256 North Oaks MN, 55127 United States	Electronic Service		No	13-867Official
7	Kenneth	Bradley	kbradley@environmentminnesota.org			2837 Emerson Ave S Apt CW112 Minneapolis MN, 55408 United States	Electronic Service		No	13-867Official
8	Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce		85 7th Place East Suite 500 St. Paul MN, 55101 United States	Electronic Service		No	13-867Official
9	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	13-867Official
10	City	Clerk	gregg.engdahl@ci.stcloud.mn.us	City of St. Cloud		400 Second St. S St. Cloud MN, 56301 United States	Electronic Service		No	13-867Official
11	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General - Department of Commerce		445 Minnesota Street Suite 1400 St. Paul MN, 55101	Electronic Service		Yes	13-867Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
12	Kevin	Cray	kevin@communitysolaraccess.org	CCSA		1644 Platte St Denver CO, 80202 United States	Electronic Service		No	13-867Official
13	George	Damian	gdamian@cleanenergyeconomymn.org	Clean Energy Economy MN		13713 Washburn Ave S Burnsville MN, 55337 United States	Electronic Service		No	13-867Official
14	Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures		3500 Bloomington Ave. S Minneapolis MN, 55407 United States	Electronic Service		No	13-867Official
15	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	13-867Official
16	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	13-867Official
17	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us	Office of the Attorney General - Department of Commerce		Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	13-867Official
18	Scott	Dunbar	sdunbar@kfwlaw.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	13-867Official
19	Hannah	Dunn	hannah.dunn@oakdalemn.gov	City of Oakdale		1584 Hadley Ave N Oakdale MN, 55104 United States	Electronic Service		No	13-867Official
20	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	13-867Official
21	Dick	Edwards	dedwards@ci.maple-grove.mn.us	City of Maple Grove		12800 Arbor Lakes Parkway P O Box 1180 Maple Grove MN, 55311-6180 United States	Electronic Service		No	13-867Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
22	Ron	Elwood	relwood@mnl sap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	13-867Official
23	Betsy	Engelking	betsy@nationalgridrenewables.com	National Grid Renewables		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	13-867Official
24	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	13-867Official
25	Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce		85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	13-867Official
26	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	13-867Official
27	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	13-867Official
28	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	13-867Official
29	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	13-867Official
30	Sean	Gosiewski	sean@afors.org	Alliance for Sustainability		2801 21st Ave S Ste 100 Minneapolis MN, 55407 United States	Electronic Service		No	13-867Official
31	Scott	Greenbert	scott@nautilussolar.com	Nautilus Solar Energy, LLC		396 Springfield Aver, Ste 2 Summit NJ, 07901 United States	Electronic Service		No	13-867Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
32	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	13-867Official
33	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	13-867Official
34	Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments		8100 Boone Blvd Suite 430 Vienna VA, 22182 United States	Electronic Service		No	13-867Official
35	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	13-867Official
36	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	13-867Official
37	Julie	Jorgensen	julie@greenmark.us.com	Greenmark Solar		4630 Quebec Ave N New Hope MN, 55428-4973 United States	Electronic Service		No	13-867Official
38	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	13-867Official
39	Ralph	Kaehler	ralph.kaehler@gmail.com			13700 Co. Rd. 9 Eysota MN, 55934 United States	Electronic Service		No	13-867Official
40	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	13-867Official
41	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	13-867Official
42	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402	Electronic Service		No	13-867Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
43	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	13-867Official
44	Aaron	Knoll	aknoll@greenespel.com	Greene Espel PLLP		222 South Ninth Street Suite 2200 Minneapolis MN, 55402 United States	Electronic Service		No	13-867Official
45	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	13-867Official
46	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	13-867Official
47	Annie	Levenson Falk	anniefl@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	13-867Official
48	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	13-867Official
49	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	13-867Official
50	Jason	Maur	jason.maur@renesolapower.com	Renesola Power Holdings, LLC		850 Canal Street 3rd Floor Stamford CT, 06902 United States	Electronic Service		No	13-867Official
51	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	13-867Official
52	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	13-867Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
53	Michael	Menzel	mike.m@sagiliti.com	Sagiliti		23505 Smithtown Rd. Suite 280 Excelsior MN, 55331 United States	Electronic Service		No	13-867Official
54	Brian	Millberg	fwengineering@comcast.net			695 Grand Ave #222 Saint Paul MN, 55105 United States	Electronic Service		No	13-867Official
55	Marc	Miller	mmiller@soltage.com	Soltage, LLC		66 York Street, 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	13-867Official
56	Marcus	Mills	marcus@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	13-867Official
57	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	13-867Official
58	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	13-867Official
59	Darin	Nelson	dnelson@minnetonkamn.gov	City of Minnetonka		14600 Minnetonka Blvd Minnetonka MN, 55345 United States	Electronic Service		No	13-867Official
60	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	13-867Official
61	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	13-867Official
62	Patty	O'Keefe	patty.okeefe@sierraclub.org			2525 Emerson Ave S Apt 2 Minneapolis MN, 55405 United States	Electronic Service		No	13-867Official
63	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	13-867Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
64	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing, MN, 55066 United States	Electronic Service		No	13-867Official
65	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	13-867Official
66	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	13-867Official
67	Morgan	Pitz	morgan.pitz@us-solar.com	US Solar		100 N 6th St #410B Minneapolis MN, 55403 United States	Electronic Service		No	13-867Official
68	Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now		null null, null United States	Electronic Service		No	13-867Official
69	Paula	Prahl	paula.prahl@dominiuminc.com	Dominium		2905 Northwest Blvd Ste 150 Plymouth MN, 55441 United States	Electronic Service		No	13-867Official
70	Bridget	Rathsack	bridget.rathsack@burnsvillemn.gov	City of Burnsville, MN		100 Civic Center Parkway Burnsville MN, 55337 United States	Electronic Service		No	13-867Official
71	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General - Residential Utilities Division		1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	13-867Official
72	Micah	Revell	micah.revell@stinson.com	Stinson LLP		50 South Sixth St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	13-867Official
73	Jonathan	Roberts	jroberts@soltage.com	Soltage		66 York St 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	13-867Official
74	Delaney	Russell	delaney@mnipl.org	Just Solar Coalition		4407 E Lake Street Minneapolis MN, 55407 United States	Electronic Service		No	13-867Official
75	Ian	SantosMeeker	ians@ips-solar.com	IPS Solar		null null, null United States	Electronic Service		No	13-867Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
76	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	13-867Official
77	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	13-867Official
78	Will	Seuffert	will.seuffert@state.mn.us	Public Utilities Commission		121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	13-867Official
79	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	13-867Official
80	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	13-867Official
81	Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC		233 Park Ave S Ste 201 Minneapolis MN, 55415 United States	Electronic Service		No	13-867Official
82	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	13-867Official
83	Karl	Sonneman	karl17@hbci.com	Law Office of Karl W. Sonneman		111 Riverfront Suite 202 Winona MN, 55987 United States	Electronic Service		No	13-867Official
84	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	13-867Official
85	Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light		null null, null United States	Electronic Service		No	13-867Official
86	Zack	Townsend	zachary.townsend@brookfieldrenewable.com	Brookfield Renewable		200 Liberty St FL 14 New York NY, 10281 United States	Electronic Service		No	13-867Official
87	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224	Electronic Service		No	13-867Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Edina MN, 55435 United States				
88	Gary	Van Winkle	gvanwinkle@mylegalaid.org	Mid-Minnesota Legal Aid		111 N Fifth St Ste 100 Minneapolis MN, 55403 United States	Electronic Service		No	13-867Official
89	John	Vaughn	nik@rreal.org	Rural Renewable Energy Alliance		3963 8th Street SW Backus MN, 55435 United States	Electronic Service		No	13-867Official
90	Robert J.V.	Vose	rvose@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	13-867Official
91	Kevin	Walker	kwalker@beaconinterfaith.org	Beacon Interfaith Housing Collaborative		null null, null United States	Electronic Service		No	13-867Official
92	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	13-867Official
93	Heidi	Winter	hwinter@co.murray.mn.us	Murray County		2500 28th Street PO Box 57 Slayton MN, 56172 United States	Electronic Service		No	13-867Official
94	Curtis	Zaun	curtis@cpzlaw.com			3254 Rice Street Little Canada MN, 55126 United States	Electronic Service		No	13-867Official
95	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	13-867Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	23-335Official
2	Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	23-335Official
3	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256 North Oaks MN, 55127 United States	Electronic Service		No	23-335Official
4	Kenneth	Bradley	kbradley@environmentminnesota.org			2837 Emerson Ave S Apt CW112 Minneapolis MN, 55408 United States	Electronic Service		No	23-335Official
5	Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce		85 7th Place East Suite 500 St. Paul MN, 55101 United States	Electronic Service		No	23-335Official
6	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	23-335Official
7	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General - Department of Commerce		445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	23-335Official
8	Kevin	Cray	kevin@communitysolaraccess.org	CCSA		1644 Platte St Denver CO, 80202 United States	Electronic Service		No	23-335Official
9	George	Damian	gdamian@cleanenergyeconomymn.org	Clean Energy Economy MN		13713 Washburn Ave S Burnsville MN, 55337 United States	Electronic Service		No	23-335Official
10	Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures		3500 Bloomington Ave. S Minneapolis MN, 55407 United States	Electronic Service		No	23-335Official
11	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401	Electronic Service		No	23-335Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
12	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us	Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	23-335Official	
13	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters	700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	23-335Official	
14	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-335Official	
15	Betsy	Engelking	betsy@nationalgridrenewables.com	National Grid Renewables	8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	23-335Official	
16	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	23-335Official	
17	Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	23-335Official	
18	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	23-335Official	
19	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	23-335Official	
20	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	23-335Official	

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
21	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	23-335Official
22	Sean	Gosiewski	sean@afors.org	Alliance for Sustainability		2801 21st Ave S Ste 100 Minneapolis MN, 55407 United States	Electronic Service		No	23-335Official
23	Scott	Greenbert	scott@nautilussolar.com	Nautilus Solar Energy, LLC		396 Springfield Aver, Ste 2 Summit NJ, 07901 United States	Electronic Service		No	23-335Official
24	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-335Official
25	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	23-335Official
26	Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments		8100 Boone Blvd Suite 430 Vienna VA, 22182 United States	Electronic Service		No	23-335Official
27	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	23-335Official
28	Julie	Jorgensen	julie@greenmark.us.com	Greenmark Solar		4630 Quebec Ave N New Hope MN, 55428-4973 United States	Electronic Service		No	23-335Official
29	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	23-335Official
30	Ralph	Kaehler	ralph.kaehler@gmail.com			13700 Co. Rd. 9 Eyota MN, 55934 United States	Electronic Service		No	23-335Official
31	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN,	Electronic Service		No	23-335Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55118 United States				
32	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23-335Official
33	Aaron	Knoll	aknoll@greenespel.com	Greene Espel PLLP		222 South Ninth Street Suite 2200 Minneapolis MN, 55402 United States	Electronic Service		No	23-335Official
34	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	23-335Official
35	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	23-335Official
36	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-335Official
37	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-335Official
38	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	23-335Official
39	Jason	Maur	jason.maur@renesolapower.com	Renesola Power Holdings, LLC		850 Canal Street 3rd Floor Stamford CT, 06902 United States	Electronic Service		No	23-335Official
40	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	23-335Official
41	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	23-335Official
42	Michael	Menzel	mike.m@sagiliti.com	Sagiliti		23505 Smithtown Rd. Suite 280	Electronic Service		No	23-335Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Excelsior MN, 55331 United States				
43	Marc	Miller	mmiller@soltage.com	Soltage, LLC		66 York Street, 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	23- 335Official
44	Marcus	Mills	marcus@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23- 335Official
45	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 335Official
46	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	23- 335Official
47	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407- 1229 United States	Electronic Service		No	23- 335Official
48	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	23- 335Official
49	Patty	O'Keefe	patty.okeefe@sierraclub.org			2525 Emerson Ave S Apt 2 Minneapolis MN, 55405 United States	Electronic Service		No	23- 335Official
50	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	23- 335Official
51	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23- 335Official
52	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	23- 335Official
53	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435	Electronic Service		No	23- 335Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
54	Morgan	Pitz	morgan.pitz@us-solar.com	US Solar		100 N 6th St #410B Minneapolis MN, 55403 United States	Electronic Service		No	23-335Official
55	Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now		null null, null United States	Electronic Service		No	23-335Official
56	Paula	Prahl	paula.prahl@dominiuminc.com	Dominium		2905 Northwest Blvd Ste 150 Plymouth MN, 55441 United States	Electronic Service		No	23-335Official
57	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-335Official
58	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General - Residential Utilities Division		1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	23-335Official
59	Jonathan	Roberts	jroberts@soltage.com	Soltage		66 York St 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	23-335Official
60	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-335Official
61	Delaney	Russell	delaney@mnipl.org	Just Solar Coalition		4407 E Lake Street Minneapolis MN, 55407 United States	Electronic Service		No	23-335Official
62	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-335Official
63	Will	Seuffert	will.seuffert@state.mn.us	Public Utilities Commission		121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23-335Official
64	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	23-335Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
65	Christopher	Sherman	csherman@sherman-associates.com	Solar Holdings LLC		233 Park Ave S Ste 201 Minneapolis MN, 55415 United States	Electronic Service		No	23-335Official
66	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	23-335Official
67	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	23-335Official
68	Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light		null null, null United States	Electronic Service		No	23-335Official
69	Zack	Townsend	zachary.townsend@brookfieldrenewable.com	Brookfield Renewable		200 Liberty St FL 14 New York NY, 10281 United States	Electronic Service		No	23-335Official
70	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	23-335Official
71	John	Vaughn	nik@rreal.org	Rural Renewable Energy Alliance		3963 8th Street SW Backus MN, 55435 United States	Electronic Service		No	23-335Official
72	Kevin	Walker	kwalker@beaconinterfaith.org	Beacon Interfaith Housing Collaborative		null null, null United States	Electronic Service		No	23-335Official
73	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	23-335Official
74	Curtis	Zaun	curtis@cpzlaw.com			3254 Rice Street Little Canada MN, 55126 United States	Electronic Service		No	23-335Official