



414 Nicollet Mall
Minneapolis, MN 55401

October 24, 2024

—Via Electronic Filing—

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

RE: COMMENTS
PROPOSED COMMUNITY SOLAR GARDEN PROGRAM AND TARIFF REVISIONS
UPDATING COMMUNITY SOLAR GARDEN TARIFF PROVIDING ADDITIONAL
CUSTOMER PROTECTIONS IN SUBSCRIPTION ELIGIBILITY
DOCKET NOS. E002/M-13-867 & E002/M-21-695

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the attached Comments in response to the Notice of Supplemental Comment Period (Notice) received from the Minnesota Public Utilities Commission on August 27, 2024 and Comments received from various parties on October 2 and 3, 2024 relating to the March 22, 2024 Joint Reply Comments filed by Xcel Energy and Energy CENTS Coalition.

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 Lynnette Sweet at lynnette.m.sweet@xcelenergy.com or contact me at or nicholas.f.martin@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

NICHOLAS F. MARTIN
DIRECTOR, STRATEGIC OUTREACH & ADVOCACY

Enclosure
cc: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER CO. D/B/A
XCEL ENERGY'S TARIFF REVISIONS
UPDATING COMMUNITY SOLAR GARDEN
TARIFF PROVIDING ADDITIONAL
CUSTOMER PROTECTIONS IN
SUBSCRIPTION ELIGIBILITY

DOCKET NOS. E002/M-13-867 AND
E002/M-21-695

COMMENTS

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER CO. D/B/A
XCEL ENERGY FOR APPROVAL OF ITS
PROPOSED COMMUNITY SOLAR GARDEN
PROGRAM

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Comments to the Minnesota Public Utilities Commission in response to its August 27, 2024 Notice of Supplemental Comment Period, and Comments received from various parties on October 2 and 3, 2024 relating to the March 22, 2024 Joint Reply Comments of the Company and Energy CENTS Coalition.

At issue in this proceeding are legal rights and consumer protections for the Company's customers – specifically, ensuring tenants in rental premises can participate in utility programs without sacrificing access to state and utility energy assistance and affordability programs, as well as consumer protections such as the Cold Weather Rule, protections from disconnection of service, payment plans and flexible billing arrangements. We appreciate the thorough comments by Parties and the robust record around the issues presented by the Notice of Supplemental Period, which have created substantive discussion around these issues and the impact of important legislative changes in both the 2023 and 2024 Minnesota Legislative

Sessions. The Company believes that these changes, together with the actions already taken in this docket, make it unnecessary for the Commission to take further action as it relates to legal rights of customers participating in the Legacy Community Solar Garden (CSG) program.

We appreciate the Department's thorough analysis of the record to date. We agree with the Department's conclusion that the 2024 legislative changes address some of the consumer protection concerns raised in this docket,¹ but may not necessarily benefit tenants already living in a Building Subscription Model (BSM) Legacy CSG-subscribed residential building. However, legislative changes have narrowed the issues to existing Legacy CSG-subscribed tenants for the following reasons:

- For the Legacy CSG program, new tenants, regardless of whether they are in a BSM model, will fall under Minn. Stat. § 504B.216, Subd 2(b). If they have an individual electric meter these provisions apply.
- Tenants participating in the Low-to-Moderate (LMI)-Accessible program created by 2023 Minnesota Legislation will have the added benefit of protections created by the Department. Since there are only three completed projects in this program, none of which utilize the BSM model to our knowledge, we expect that most of the remaining projects will be completed after the effective date of Minn. Stat. § 504B.216, Subd 2(b).

Tenants can now maintain a direct relationship with the Company as the electricity account holder under either the Legacy or LMI-Accessible CSG program and are thus protected by the newly established consumer protection statutes.

We concur with the comments submitted by the Office of the Attorney General (OAG) that billing practices that interpose middlemen between tenants and their regulated utility are not in the public interest, and that accommodating the rebilling practices highlighted in this proceeding would impose harms that outweigh any potential benefits of increasing participation in the CSG programs. We also agree with the comments submitted by the Citizens Utility Board of Minnesota (CUB), Mid-Minnesota Legal Aid, and Legal Services Advocacy Project (together, CML Joint Commenters). Together, these parties agree that the 2024 legislative changes address many of the concerns raised in the Joint Petition, and that this change, together with the requirements of the new LMI-Accessible CSG program, render it unnecessary to take additional action to explore further tariff amendments or other potentially complicated modifications to our billing systems to accommodate the BSM.

Importantly, the CML Joint Commenters point out that eliminating or reducing use of

¹ See Xcel Energy Compliance Filing, November 11, 2022, page 17.

the BSM does not preclude tenants in multi-dwelling unit (MDU) buildings from participating in a CSG program. It simply precludes landlords from subscribing their tenants in a CSG chosen by the landlord. Individual tenants are free to choose to participate in the CSG program directly, and now have greater ability to do so under the recently implemented LMI-Accessible CSG program. By directly subscribing to an LMI-Accessible CSG and maintaining an Xcel Energy account in the tenant's name, the tenant can both benefit from participation in a CSG and retain access to statutorily established consumer protections and the Company's affordability programs.

Given the above, and the potential public interest and customer harms that joint landlord-tenant utility accounts could bring, we respectfully request that the Commission:

- Allow the Company to withdraw its *In Care Of* billing proposal,
- Accept the tariff changes we propose in these Comments to align with the recent changes to Chapter 504B, and
- Close, suspend, or redirect this docket to focus on increasing access to energy assistance for rebilled tenants in master-metered buildings, as advocated by the OAG.

COMMENTS

In these comments, we outline how we believe the initial intent of this proceeding has been resolved, and thus there is no need for further Commission action.

I. THE COLLECTIVE EFFORTS OF PARTIES AND LEGISLATIVE ACTIONS HAVE RESOLVED THE ISSUES

As described in the March 22, 2024 Reply Comments of the Company and Energy CENTS Coalition, the results of the above referenced docket include: (1) the creation of an Opt-in/Opt-out model for future subscribers to Legacy CSG under a landlord agreement, and (2) changes to our Low-Income Discount Rider to eliminate the electric consumption threshold and create bill enhancements to the PowerON program to make participation easier.

A. Legacy CSG Program

The Commission's August 11, 2023 Order provided the foundation of the tariff changes put into place beginning in October of 2023. These tariff changes created a "Landlord Addendum" that enables tenants to discontinue their participation in a Legacy CSG via their landlord and ensure the tenant is the Customer of Record if the

customer/tenant so chooses through Opt-in/Opt-out options. The tariff provisions were generally supported by the Department, OAG and Energy CENTS Coalition.² In addition, CSG Operators supported the policy as a result of several workgroups held throughout 2023 to find a mutually acceptable solution.

Significant legislative changes have occurred since our initial petition in this docket in 2021. First, the 2023 Legislation closed the Legacy CSG program to new applications. Beginning in 2024, no additional applications under the program were accepted – limiting the number of new customers impacted by the Opt-in/Opt-out tariff changes. In addition, the 2023 Legislation authorized the LMI-Accessible CSG program, managed by the Department of Commerce. While this option will likely increase residential, and particularly low- and moderate-income residential customer subscribers, the Department has put additional protections in place and has more insight into contractual obligations by Garden Operators than the Company has under the Legacy CSG program. Further legislation in the 2024 session set parameters around tenant billing: effective January 1, 2025, landlords are prohibited from removing a directly metered tenant from the tenant’s existing utility account or requesting that the utility remove the tenant from the tenant’s existing utility account (Minn. Stat. § 504B.216, Subd 2(b)). Through these legislative changes, impacts on tenants under the Legacy CSG program are limited, and tenants under the LMI-Accessible CSG program will be protected by the Department’s rules as well as newly enacted law. To date, there is a limited number of LMI-Accessible CSG’s completed – none of which are under the BSM model.

It is also our understanding that there have been no new BSM subscriptions since October 1, 2023, which is the date that the Company’s new tariffed Opt-In form needs to be used for new BSM subscriptions or when new tenants move into a premise that is already subject to a BSM subscription. Since the date of filing that tariff form, no completed form has been sent to the Company. Other than those tenants who were required to subscribe to a BSM CSG subscription prior to October 1, 2023, the BSM issues do not appear to be a continuing concern.

B. Low-Income Discount Rider and PowerON Customers

The Company and stakeholders have spent a significant amount of time discussing third-party billing and overlaps with the Company’s programs including those for

² The Department states it “allowed tenants to choose the options that best fit their personal circumstances” (page 3, Initial Comments by the Department of Commerce, 12/21/22). The OAG stated it “ensures low-income tenants enter into it knowingly and voluntarily” (pg. 4, Initial Comments by the OAG, 12/21/22).

affordability. As a result of these conversations, two changes were made to increase participation and make specific billing details more transparent.

First, the low-income discount rider eliminated the kWh threshold to better align with the PowerON program. This change was approved by Commission in their August 11, 2023 Order.

Second, in our October 27, 2023 compliance filing, we offered a cost-effective, easy to understand improvement to the bills of customers who are participating in the PowerON Program. This billing system changes will provide customers clarity and decrease the administrative burden of our third-party implementer by reflecting the adjusted amount due from a customer on the current month's bill, after their PowerON adjustment has been calculated and applied, in the "Please Pay Amount" field.

The PowerON credit is calculated based on household income, using the customer's actual annual electric bill, reducing the annual electric bill to three percent of the customer's household income, providing a credit for the difference, and requiring the customer to make a levelized, monthly payment amount. The Company is still working through some unforeseen challenges in putting this into practice but anticipates that this will be resolved by the end of the year.³

II. JOINT ACCOUNT TENANCY IS UNNECESSARY

The Commission's Notice on August 27, 2024, requests other possible solutions to satisfy Order Point 2B⁴ in the Commission's June 24, 2022 Order and Order Point 3⁵ in the Commission's August 11, 2023 Order. The August 11 Order contemplated that we address two issues. The first is a long-standing billing issue of the PowerON program that we are continuing to address as noted above. The second is the ability to offer tenants bill pay assistance through our Affordability Programs when they either have never been registered with us as the customer of record, or they have been taken off the bill as the customer of record because of third party re-billing practices that

³ The Company originally anticipated this to be completed in the spring but have run into unforeseen challenges with our IT systems. We fully anticipate resolving these issues in 2024.

⁴ Order point 2B states: "Xcel shall propose a modification to its tariffs for these programs to allow low-income renters who are subject to third-party billing to access these programs."

⁵ Order point 3 states: Xcel must work with the Department of Commerce's Energy Development Office on programmatic improvements to its billing system to accomplish the goals of Community Solar Garden legislation passed in the 2023 legislative session, and the goals previously set forth in ordering paragraph 2B of the Commission's June 24, 2022, Order. Before implementing changes, Xcel shall report back to the Commission no later than January 15, 2024 on details, including but not limited to: the necessary changes to its billing system, the incremental costs thereof, an analysis of what data sharing requirements will be necessary, and the estimated number of tenants/households that would benefit.

most often occur when a landlord has become the subscriber and associates the tenant's apartment unit with that subscription. In these cases, customers can utilize the *In Care Of* billing option today – except for those tenants that have been re-billed as CSG subscribers since this adjusts the way we can define a subscriber. The Company has not provided another solution for those re-billed tenants as part of the CSG program but was part of conversations convened by Legal Aid on third-party re-biller legislative reform as a precursor to the 2024 legislative changes.

The Department has suggested in their Comments that the Company should consider additional billing system changes to allow Joint Account Tenancy, thereby allowing the landlord and tenant to be joint “Customers of Record.”⁶ In this scenario, income qualified tenants would remain the Customer of Record and the landlord would be the subscriber for a CSG. It is important to note that in this scenario, tenants may still not receive their bill directly, but instead be billed indirectly by a third-party. The Company is concerned that Joint Tenancy could allow landlords, who might not otherwise qualify for energy assistance or utility affordability programs, to gain access to those benefits for which their income-qualified tenants are the intended recipients. In that scenario the Company would have no means of ensuring that the landlord would convey those benefits on to the tenant. Further, limitations of the Company's billing systems do not appear to be the primary barrier to what the Department proposes; rather, state law, Commission rule, and public policy are the initial barriers.

The Department suggested that joint ownership of accounts is a common practice with bank accounts, mortgages, and insurance, and that this would support allowing a tenant and landlord to be joint “Customer of Record.” While the Company agrees that joint accounts are common practice with bank accounts, mortgages, and insurance, having joint electricity customer accounts of those types between a landlord and tenant would be abnormal and likely not the intended use case for joint account ownership. Therefore, the Company does not believe this is an applicable analogy for this situation.

The Company's view is that the law in Minnesota presumes that the landlord and tenant will not both be a Customer of Record on the same account. The Commission's landlord-tenant rule at Minn. R. 7820.1400, by its wording that the tenant is not liable for the utility charges of the landlord, appears to also be based on this premise. We believe having both the tenant and landlord be a joint Customer of Record is inconsistent with this Rule.

It should be noted that this Commission Rule refers to “the” Customer of Record,

⁶ Department Comments beginning at page 11.

instead of “a” customer of record. This re-affirms the long-held practice of only having a single Customer of Record on utility accounts. Recent legislation affirms this approach. See, for example, new Minn. Stat. § 504B.216, Subd. 2., and Subd 13(b), which in the shared-meter context uses the term “the” Customer of Record, and associates bill payment responsibility with being the Customer of Record. Similarly, a review of the entirety of the 2023 version of Minn. Stat. § 216B (the Public Utility Act) shows 146 instances of the phrase “the customer”, and 81 instances of the phrase “a customer.” None of the instances of “a customer” imply that there can be more than one customer per account. There are no instances of the phrase “joint customer.” Consistent with this, the 2023 version of Minn. Stat. § 504B (the Landlord and Tenant Act) uses the phrase “the customer of record” 4 times, and the new 2024 legislation creating Minn. Stat. § 504B.216 has 7 new instances of “customer of record.”

The Company appreciates the OAG’s insights⁷ that having joint landlord-tenant accounts would undermine the statutory prohibition on removing directly metered tenants from their utility accounts, and that the costs and risks of implementing these types of joint accounts would outweigh the benefits and not be in the public interest.

The Company is aware of no other solutions as resolution to the June or August Orders. However, given new legislation, we believe that this issue is minimized going forward and can continue to be addressed through the Opt-in/Opt-out option.

III. ALL COMMENTING PARTIES SUPPORT WITHDRAWAL OF THE COMPANY’S *IN CARE OF BILLING* PROPOSAL

In the March 22, 2024 Reply Comments, the Company and Energy CENTS Coalition recommended withdrawing the *In Care Of* billing proposal because it is inconsistent with the Minnesota CSG statute. Commenting parties also agree that the *In Care Of* billing proposal may not be in the best interest of the tenant and support its withdrawal. The Department and the OAG support withdrawal of this proposal (Comments at page 11 and 6, respectively). Similarly, CML Joint Commenters support either withdrawal or no Commission action.⁸

As noted above, the Company and Energy CENTS proposal is only to withdraw *In Care Of* billing with respect to CSG subscriptions, due to its inconsistency with Minnesota CSG statute. The *In Care Of* billing option remains available in other cases.

⁷ OAG Comments page 9-10.

⁸ CML Comments at page 2 and 5.

IV. OTHER ISSUES RELATING TO REBILLING AND THIRD-PARTY BILLING

The Department notes several other issues related to rebilling and third-party billing. The Commission may want to move these issues into a specific docket for further discussion as these seem to be topics outside the purpose of the issues identified in this docket.

The Company understands that the Legislature has taken action on issues such as potential harm in submetering with the recently enacted revisions to Minn. Stat. § 216B.022 (Submetering in Shared-Metered Residential Buildings), new Minn. Stat. § 216B.023 (Shared-Metered Residential Buildings; Billing; Consumer Protections); new Minn. Stat. § 216B.024 (Shared-Metered Residential Buildings; Dispute Resolution); revisions to Minn. Stat. § 216B.098 (giving Commission authority to resolve customer complaints against a landlord of a shared-metered residential building); revisions to Minn. Stat. § 216B.172; new Minn. Stat. § 504B.216 (Utility Service in Shared-Metered Residential Buildings); and revisions to Minn. Stat. § 504B.285. The Department notes various concerns such as possibly inaccurate submeters and charges from unoccupied units. If the Commission wants to investigate these issues further, the Company believes that this should take place in a separate docket topical to these issues.

V. OAG REQUEST FOR MODIFICATIONS TO THE TARIFFED OPT-IN FORM

The OAG notes that the tariffed Landlord Addendum and Opt-In form at tariff sheets 9-99.1 through 9-99.3 are inconsistent with new law as they imply that landlords and tenants can agree to have the direct metered account in the name of the landlord.⁹ The pertinent language in the new law under Minn. Stat. § 504B.216, Subd. 2 states: "... (b) A landlord is prohibited from removing a directly metered tenant from the tenant's existing utility account or requesting that a utility remove the tenant from the tenant's existing utility account. (c) This subdivision may not be waived by contract or otherwise." This provision has the following effective date: "... effective January 1, 2025, for leases entered into or renewed on or after that date." (2024 Minn. Laws Ch. 107, Sec. 10).

The Company would not expect that this Landlord Addendum and Opt-in tariff form would be used by landlords to contravene the law. However for clarity, the Company proposes the following redline changes to these tariff sheets, with a proposed effective date no earlier than January 1, 2025 to be consistent with the effective date of the new law:

⁹ OAG Comments pages 7-9.

1. *On tariff sheet 9-99.1:*

This Landlord Addendum only applies where the premise associated with a Subscription is occupied by a residential tenant, and where the tenant is not the named customer on the Company account. However, notwithstanding this, if the premise is part of a multi-unit single-meter building and if the landlord is the existing Company account holder, or if the building for the premise has a single meter for the whole building and if the landlord is the existing Company account holder, or if the Company account for the unit continuously since January 1, 2015 has been in the name of a landlord, or if the landlord pays the electric bill and does not pass the electrical bill costs to the tenant, then a landlord may have a Subscription in its name without the Community Solar Garden being subject to this Landlord Addendum.

Further, notwithstanding the above, this Landlord Addendum may only be used where the Landlord complies with Minn. Stat. § 504B.216, Subd. 2.

2. *On tariff sheet 9-99.3:*

**Attachment “A” to Landlord Addendum
Opt-In Form**

This Landlord Addendum Opt-In Form can only be used when as of December 31, 2024 the Tenant had a lease with the Landlord for the Premise below, and as of that date the Landlord was the Customer of Record with Xcel Energy for the electrical account for the Premise below.

I consent to Opt-In so as to allow the Landlord for the Premise identified below to have a Community Garden Subscription be associated with this Premise. In doing so, I understand that I will ~~not longer~~ have an Xcel Energy account in my name for this Premise and I understand that I may be rebilled for electric charges through the property owner’s billing agent or Landlord. I understand that ~~not having an closing my~~ Xcel Energy account and agreeing to be rebilled for electric usage by the Landlord means I will no longer be eligible for any Xcel Energy Affordability Programs (PowerON, Low-Usage Affordability Credit, Medical Assistance Program, Senior Low Income Discount) or will not have protection by the Minnesota Public Utilities Commission under laws governing payment plans, budget billing and payment plan offerings, including medically necessary equipment and Cold Weather Rule protections. ~~If I am currently on a payment plan with Xcel Energy, then any outstanding amounts under that payment plan would be immediately due.~~

I understand I can later Opt-Out and revoke my consent for any reason, and in doing so I will not be charged any fee by the Landlord or the Community Solar Garden Operator for Opting-out, nor any fee to reinstate or become the named customer on the Xcel Energy account.

In the above tariff sheet 9-99.3, we have included one additional change: adding to the list of Xcel Energy Affordability Programs the Low-Usage Affordability Credit program, which was approved in 2023 as part of the Company’s Multiyear Rate Plan in Docket No. E-002/GR-21-630 (there called the “Low-Income, Low-Usage

Discount Program”).¹⁰ That program is now available,¹¹ but like the other programs mentioned above, requires the participant to be a Customer of Record.

The Department has also suggested changes to the Opt-in/Opt-out form to include more customers.¹² However, the prior Commission order set the effective date for the required use of this form, and it was not applied retroactively. With the changes outlined above, we do not believe it is necessary to take this additional step.

VI. CML JOINT COMMENTERS REQUEST FOR FURTHER COMPLIANCE FILING

CML Joint Commenters request a further compliance filing by the Company to provide additional updates (if any) of its implementation of any further billing improvements or modifications in compliance with Order Point 3 of the Commission’s August 11, 2023 Order and consistent with recommendations shared in response to the Commission’s August 27, 2024 Notice of Comment period.

The Company has reported on all progress thus far and does not see a need for further reporting in the future.

CONCLUSION

As noted by CML Joint Commenters, the legislative changes made during both the 2023 and 2024 Minnesota Legislative Sessions address many of the concerns raised in the Joint Petition, and no further Commission action is necessary to explore tariff amendments or other modifications to the Xcel Energy billing systems to accommodate third-party re-billing at this time. Similarly, it is not in the public interest for the Commission to expand landlords’ access to and control over tenants’ utility accounts just to accommodate models such as BSM – particularly at the risk of those same tenants losing access to low-income affordability programs and consumer protections such as payment plans, budget billing and payment plan offerings, medically necessary equipment, and Cold Weather Rule protections.

Eliminating or reducing use of the BSM does not preclude low-income (or other) tenants from participating in community solar; instead, it precludes landlords from subscribing accounts used by tenants in a CSG chosen by the landlord. Under the Opt-in/Opt-out options, the new LMI-Accessible CSG program, and as result of

¹⁰ See July 17, 2023 Findings of Fact, Conclusions and Order *In the Matter of the Application of Northern States Power Company, dba Xcel Energy, for Authority to Increase Rates for Electric Service in the State of Minnesota*. Docket No. E-002/GR-21-630. Order points 63 and 64.

¹¹ See [Low-Usage Affordability Credit | Energy Assistance | Billing & Payment | Xcel Energy](#).

¹² Department Comments at page 18.

legislation, tenants should have the ability and right to directly subscribe to a CSG of their choosing, which puts the control of whether and in which garden or other energy program option to participate in the tenants' hands.

As noted by the OAG, the best way for the Commission to protect tenants is to avoid interposing a middleman between tenants and their regulated utility. The Minnesota Legislature has taken steps in recent legislation to limit rebilling of tenants whose unit is directly metered by Xcel Energy. The Commission should follow the direction set forth by the Legislature by finding that accommodating the rebilling practices at issue here would pose significant consumer-protection harms that outweigh any potential benefits from increased participation in community solar.

Given the changes to protect tenants and expand their access to customer programs, and public interest and customer harms that joint landlord-tenant utility accounts could bring, we respectfully request the Commission to:

- Allow the Company to withdraw its *In Care Of* billing proposal,
- Accept the tariff changes we propose in these Comments to align with the recent changes to Chapter 504B, and
- Close, suspend, or redirect this docket to focus on increasing access to energy assistance for rebilled tenants in master-metered buildings, as advocated by the OAG.

Dated: October 24, 2024

Northern States Power Company

CERTIFICATE OF SERVICE

I, Victor Barreiro, 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/M-13-867 & E002/M-21-695

Dated this 24th day of October 2024

/s/

Victor Barreiro
Regulatory Administrator

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Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_13-867_Official
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Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_13-867_Official
Sean	Gosiewski	sean@afors.org	Alliance for Sustainability	2801 21st Ave S Ste 100 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
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Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments	8100 Boone Blvd Suite 430 Vienna, VA 22182	Electronic Service	No	OFF_SL_13-867_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Julie	Jorgensen	juliejorgensen62@gmail.com	Greenmark Solar	4630 Quebec Ave N New Hope, MN 55428-4973	Electronic Service	No	OFF_SL_13-867_Official
Ralph	Kaehler	Ralph.Kaehler@gmail.com		13700 Co. Rd. 9 Eyota, MN 55934	Electronic Service	No	OFF_SL_13-867_Official
Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC	4710 Blaylock Way Inver Grove Heights, MN 55076	Electronic Service	No	OFF_SL_13-867_Official
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Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors	3140 43rd Ave S Minneapolis, MN 55406	Electronic Service	No	OFF_SL_13-867_Official
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Matthew	Melewski	matthew@nokomisenergy.com	Nokomis Energy LLC & Ole Solar LLC	2639 Nicollet Ave Ste 200 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, MN 55120	Electronic Service	No	OFF_SL_13-867_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Logan	O'Grady	logrady@mNSEIA.org	Minnesota Solar Energy Industries Association	2288 University Ave W St. Paul, MN 55114	Electronic Service	No	OFF_SL_13-867_Official
Patty	O'Keefe	patty.okeefe@sierraclub.org		2525 Emerson Ave S Apt 2 Minneapolis, MN 55405	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_13-867_Official
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_13-867_Official

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Gabriel	Chan	gabechan@umn.edu	University of Minnesota	130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, MN 55455	Electronic Service	No	OFF_SL_21-695_21-695
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-695_21-695
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-695_21-695

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Scott	Greenbert	scott@nautilussolar.com	Nautilus Solar Energy, LLC	396 Springfield Aver, Ste 2 Summit, NJ 07901	Electronic Service	No	OFF_SL_21-695_21-695
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Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_21-695_21-695
Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments	8100 Boone Blvd Suite 430 Vienna, VA 22182	Electronic Service	No	OFF_SL_21-695_21-695
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_21-695_21-695
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association	2288 University Ave W St. Paul, MN 55114	Electronic Service	No	OFF_SL_21-695_21-695
Patty	O'Keefe	patty.okeefe@sierraclub.org		2525 Emerson Ave S Apt 2 Minneapolis, MN 55405	Electronic Service	No	OFF_SL_21-695_21-695
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_21-695_21-695

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Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_21-695_21-695
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_21-695_21-695
Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now	N/A	Electronic Service	No	OFF_SL_21-695_21-695
Paula	Prahl	paula.prahl@dominiuminc.com	Dominium	2905 Northwest Blvd Ste 150 Plymouth, MN 55441	Electronic Service	No	OFF_SL_21-695_21-695
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-695_21-695
Jonathan	Roberts	jroberts@soltage.com	Soltage	66 York St 5th Floor Jersey City, NJ 07302	Electronic Service	No	OFF_SL_21-695_21-695
Delaney	Russell	delaney@mnipl.org	Just Solar Coalition	4407 E Lake Street Minneapolis, MN 55407	Electronic Service	No	OFF_SL_21-695_21-695
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-695_21-695

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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	Electronic Service	No	OFF_SL_21-695_21-695
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Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light	N/A	Electronic Service	No	OFF_SL_21-695_21-695
Anna	Tobin	atobin@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-695_21-695
Zack	Townsend	zachary.townsend@brookfielddrenewable.com	Brookfield Renewable	200 Liberty St FL 14 New York, NY 10281	Electronic Service	No	OFF_SL_21-695_21-695
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