



414 Nicollet Mall  
Minneapolis, MN 55401

September 27, 2018

—Via Electronic Filing—

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

RE: REPLY COMMENTS  
SOLAR\*REWARDS PROGRAM AND COMMUNITY SOLAR GARDEN PROGRAM  
TARIFF UPDATES  
DOCKET NO. E002/M-18-381

Dear Mr. Wolf,

Northern States Power Company, doing business as Xcel Energy, files the attached Reply Comments in response to the Commission's Notice of Supplemental Comment Period issued on August 27, 2018.

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 Jessica Peterson at [jessica.k.peterson@xcelenergy.com](mailto:jessica.k.peterson@xcelenergy.com) or 612-330-6850 if you have any questions regarding this filing.

Sincerely,

/s/

SHAWN WHITE  
MANAGER  
DSM REGULATORY STRATEGY & PLANNING

Enclosures  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie J. Sieben	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY  
FOR APPROVAL OF PROGRAM TARIFF  
UPDATES FOR SOLAR\*REWARDS

DOCKET No. E002/M-18-381

**REPLY COMMENTS**

**OVERVIEW**

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to the Commission's Notice of Supplemental Comment Period issued on August 27, 2018 and Comments received September 17, 2018 regarding the Company's proposed tariff revisions to the Solar\*Rewards Customer Contracts submitted to the Commission on August 14, 2018.

**REPLY**

**I. BACKGROUND**

Minn. Stat. §116C.7792 was modified during the 2018 legislative session. The modified statute, in part, increases the size of systems eligible to receive Solar\*Rewards incentives from 20 kW to 40 kW and creates alignment with the Solar Energy Standard's small solar carve out; which applies to systems sized up to 40 kW.

The plain language of the statute limits customer eligibility to receive incentive payments to customer locations where the total aggregate nameplate capacity does not exceed 40 kW. Within a week of the statute taking effect, the Company submitted tariffs to the Commission mirroring the statute's exact language. Thereafter, solar developers contacted the Company about cases where additional arrays were planned that would cause the aggregate nameplate capacity at a premise to exceed 40 kW. The

Company then filed revisions to its proposed tariff language in order to accommodate certain customers. The Company's revisions mirror the statute's operative date, and designates corresponding treatment for systems installed prior to or after June 1, 2018. The Company's proposed tariff revisions apply a reasonable way to implement the statute to conditions where Solar\*Rewards systems were installed prior to June 1, 2018, as well to where Solar\*Rewards systems are installed after this date.

It is our understanding that some developers want to target customers with existing on-site solar systems who already receive incentives under either Solar\*Rewards or Made in Minnesota, and to sell them additional solar arrays *of unlimited size* and to access other tariffed benefits without causing that customer to lose eligibility for its ten year stream of small solar incentive payments. It is the Company's understanding that such a co-location scenario was never contemplated during discussions at the Legislature. However, under our proposed tariff revisions, and consistent with the wording of the statute, if a Solar\*Rewards system was installed prior to June 1, 2018, the customer can then add on a significantly larger system (subject to the 120% rule for the site) and not jeopardize the Solar\*Rewards incentive for this older Solar\*Rewards system. If, however, a Solar\*Rewards system is installed after June 1, 2018, the incentive for this newer Solar\*Rewards system would not be payable once the aggregate capacity of all systems exceeds 40 kW.

It is our understanding that some developers are encouraging customers to install larger capacity systems, such as a single system constructed after June 1, 2018, and sized to 100 kW for example, and to bifurcate a 40 kW portion for participation in the Solar\*Rewards program in order to buy down the overall system cost. It is the Company's understanding that such a scenario was never contemplated during discussions at the Legislature, and the incentive for this proposed newer Solar\*Rewards system would not be available.

We do not reiterate here our comments regarding the rules of statutory interpretation, beyond noting that the Company relied on the plain language of Minn. Stat. §116C.7792 in drafting its proposed tariffs. We seek a determination from the Commission about the interpretation of the statute and guidance with respect to the implementation questions this matter poses.

## **II. EXAMPLES OF CONFIGURATIONS**

To provide additional context, we provide some examples drawn from our program applicant pool of aggregate capacity proposed at a premise.

*Customer 1:* Made in Minnesota installation (40 kW) + pre-2018 Solar\*Rewards installation (20 kW) + 2018 Solar\*Rewards application (20 kW) = 80 kW

*Customer 2:* Made in Minnesota installation (40 kW) + 2018 Solar\*Rewards application (40 kW) = 80 kW

*Customer 3:* 2018 Solar\*Rewards application (40 kW) + 2018 Net Metering application (22 kW) = 62 kW

*Customer 4:* Pre-2018 Solar\*Rewards application (20 kW) + 2018 Net Metering application (40 kW) = 60 kW

*Customer 5:* Pre-2018 Solar\*Rewards application (20 kW) + 2018 Solar\*Rewards application (20 kW) = 40 kW

Our tariff provisions would allow customers with installed systems currently receiving a Solar\*Rewards incentive to remain unaffected by the statutory change *unless* they are applying for another incentive. When applying for an additional incentive for systems installed after June 1, 2018 they would be limited to an aggregate capacity of 40 kW at the customer location in order to be eligible for this additional Solar\*Rewards incentive. For instance, *Customers 1, 2, or 3* would not be eligible to receive an incentive for the 2018 Solar\*Rewards project since they exceed 40 kW.

The Company has no intention of stopping payment for existing incentives for projects installed prior to June 1, 2018 if the total aggregate capacity at the customer location exceeds 40 kW. Therefore, the incentive for *Customer 4 and 5* would have no risk associated with their Solar\*Rewards projects.

To reiterate, under these rules, customers who have installed a previous Made in Minnesota or Solar\*Rewards project would not be eligible for an additional Solar\*Rewards incentive for a system that exceeds 40 kW of net metered solar at the premise if it was not installed by June 1, 2018, but the customer could install additional solar systems at this location under other interconnection options.

For new projects (at a customer location currently without solar) applying under the Solar\*Rewards program, production incentives will be limited to 40 kW at a customer location level. In these cases, expectations are set that adding any solar in addition to the 40 kW Solar\*Rewards system will impact this Solar\*Rewards incentive. For example, if a customer applies for 40 kW under the Solar\*Rewards program and also applies for a 40 kW net metering project, the Solar\*Rewards application will be denied. In addition, if a customer installs 40 kW under the Solar\*Rewards program

and five years later installs a net metering project of 40 kW, the Solar\*Rewards incentive would be stopped from that point forward. This provision sets clear requirements upfront before projects are installed.

Of the projects noted in our Supplemental Comments on September 17, 2018 and reflected below in Table 1, there are approximately 35 projects that have submitted applications in 2018 for Solar\*Rewards that would not be eligible for the incentive if our proposed tariff were to be adopted.

**Table 1: Application By Category as of September 5, 2018**

<b>Year-Program</b>	<b>PV Size (DC)</b>	<b>Applications Received</b>	<b>Total MW</b>
2018 Solar*Rewards Applications	<20 kW	826	7.88
2018 Solar*Rewards Applications	>20 kW - ≤40 kW	106	3.90
2018 Non-Solar Rewards Solar Installation	<20 kW	14	0.10
2018 Non-Solar Rewards Solar Installation	>20 kW - ≤40 kW	3	0.09
2018 Non-Solar Rewards Installation	>40 kW - ≤ 1000 kW	39	9.45
<b>Total</b>		<b>988</b>	<b>21.42</b>

### **III. PATHS FORWARD**

We believe there is a relatively straightforward issue before the Commission: whether it is consistent with statute and good public policy that a customer who has received an incentive to install a small solar system can continue to add co-located solar arrays at their premise without foregoing their future incentive payments for Solar\*Rewards systems installed after June 1, 2018.

We recognize that, while this issue is relatively straightforward, there has been uncertainty since the Company made its tariff proposal. To acknowledge the uncertainty that has arisen, the Company would not oppose a transitional waiver for customers that submit Solar\*Rewards applications prior to January 1, 2019, but not installed by June 1, 2018, to receive the incentive provided that:

- 1) adding the Solar\*Rewards project subject to this transitional waiver does not result in the total aggregate nameplate capacity of all Solar\*Rewards projects at the Service Address to exceed 40 kW;

- 2) the sum of the total aggregate capacity of all photovoltaic generating systems at the Service Address does not exceed the total installed as of January 1, 2019, plus the capacity of the Solar\*Rewards application(s) submitted or pending in 2018 but not installed by January 1, 2019; and
- 3) all other program requirements are met.

If there is any other application submitted after January 1, 2019, to have any additional photovoltaic generating capacity at the Service Address, then the customer will not be eligible to continue to receive the incentive for any Solar\*Rewards system added on or after June 1, 2018 once the total aggregate capacity of all photovoltaic generating systems at the Service Address exceeds 40 kW DC.

### **CONCLUSION**

We appreciate the opportunity to provide these Reply Comments. We believe the Company's proposed tariffs are a reasonable application of the statute and are consistent with the policy objectives of the program.

Dated: September 27, 2018

Northern States Power Company

## CERTIFICATE OF SERVICE

I, Carl Cronin, 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; or

xx by electronic filing.

**Docket Nos.: E002/M-18-381**

Dated this 27<sup>th</sup> day of September.

/s/

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Carl Cronin  
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street  Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-381_M-18-381
Ross	Abbey	ross.abbey@us-solar.com	United States Solar Corp.	100 North 6th St Ste 222C  Minneapolis, MN 55403	Electronic Service	No	OFF_SL_18-381_M-18-381
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211  Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_18-381_M-18-381
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1774 Platte St  Denver, CO 80202	Electronic Service	No	OFF_SL_18-381_M-18-381
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-381_M-18-381
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	OFF_SL_18-381_M-18-381
Sara	Baldwin Auck	sarab@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156  Latham, NY 12110	Electronic Service	No	OFF_SL_18-381_M-18-381
Ryan	Barlow	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-381_M-18-381
Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP	396 Hayes Street  San Francisco, CA 94102	Electronic Service	No	OFF_SL_18-381_M-18-381
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-381_M-18-381



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_18-381_M-18-381
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_18-381_M-18-381
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_18-381_M-18-381
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_18-381_M-18-381
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-381_M-18-381
Jeanne	Cochran	Jeanne.Cochran@state.mn.us	Office of Administrative Hearings	P.O. Box 64620  St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_18-381_M-18-381
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_18-381_M-18-381
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-381_M-18-381
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-381_M-18-381

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Corey	Conover	corey.conover@minneapolismn.gov	Minneapolis City Attorney	350 S. Fifth Street City Hall, Room 210 Minneapolis, MN 554022453	Electronic Service	No	OFF_SL_18-381_M-18-381
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-381_M-18-381
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Solar	14333 Orchard Rd.  Minnetonka, MN 55345	Electronic Service	No	OFF_SL_18-381_M-18-381
Joseph	Dammel	joseph.dammel@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_18-381_M-18-381
Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures	3500 Bloomington Ave. S  Minneapolis, MN 55407	Electronic Service	No	OFF_SL_18-381_M-18-381
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-381_M-18-381
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_18-381_M-18-381
Jason	Edens	jason@rreal.org	Rural Renewable Energy Alliance	3963 8th Street SW  Backus, MN 55435	Electronic Service	No	OFF_SL_18-381_M-18-381
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_18-381_M-18-381
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303  Minneapolis, MN 55414	Electronic Service	No	OFF_SL_18-381_M-18-381

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-381_M-18-381
Matthew D.	Forsgren	mforsgren@greeneespel.com	GREENE ESPEL PLLP	222 S. Ninth Street, Suite 2200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-381_M-18-381
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_18-381_M-18-381
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway  Minneapolis, MN 55405	Electronic Service	No	OFF_SL_18-381_M-18-381
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_18-381_M-18-381
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_18-381_M-18-381
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-381_M-18-381
Sean	Gosiewski	sean@afors.org	Alliance for Sustainability	2801 21st Ave S Ste 100  Minneapolis, MN 55407	Electronic Service	No	OFF_SL_18-381_M-18-381
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_18-381_M-18-381
Timothy	Gulden	info@winonarenewableenergy.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr  Winona, MN 55987	Electronic Service	No	OFF_SL_18-381_M-18-381

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Duane	Hebert	duane.hebert@novelenergy.biz	Novel Energy Solutions	1628 2nd Ave SE Rochester, MN 55904	Electronic Service	No	OFF_SL_18-381_M-18-381
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-381_M-18-381
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_18-381_M-18-381
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_18-381_M-18-381
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_18-381_M-18-381
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_18-381_M-18-381
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_18-381_M-18-381
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-381_M-18-381
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-381_M-18-381
Julie	Jorgensen	julyejorgensen@greenmark solar.com	-	4630 Quebec Ave N New Hope, MN 55428-4973	Paper Service	No	OFF_SL_18-381_M-18-381

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road  Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_18-381_M-18-381
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Electronic Service	No	OFF_SL_18-381_M-18-381
Madeleine	Klein	N/A	ENGIE	225 W Hubbard St Ste 200  Chicago, IL 60654	Paper Service	No	OFF_SL_18-381_M-18-381
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_18-381_M-18-381
Aaron	Knoll	aknoll@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-381_M-18-381
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_18-381_M-18-381
Jon	Kramer	sundialjon@gmail.com	Sundial Solar	3209 W 76th St  Edina, MN 55435	Electronic Service	No	OFF_SL_18-381_M-18-381
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_18-381_M-18-381
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-381_M-18-381

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_18-381_M-18-381
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_18-381_M-18-381
Reid	LeBeau	rlebeau@thejacobsonlawgroup.com	Jacobson Law Group	180 E 5th Ste 940  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_18-381_M-18-381
Dean	Leischow	dean@sunriserng.com	Sunrise Energy Ventures	315 Manitoba Ave  Wayzata, MN 55391	Electronic Service	No	OFF_SL_18-381_M-18-381
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-381_M-18-381
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_18-381_M-18-381
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-381_M-18-381
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_18-381_M-18-381
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_18-381_M-18-381
David	Moe	momentums@aol.com		2825 28th Ave S  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_18-381_M-18-381

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-381_M-18-381
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-381_M-18-381
Martin	Morud	mmorud@trunorthsolar.com	Tru North Solar	5115 45th Ave S  Minneapolis, MN 55417	Electronic Service	No	OFF_SL_18-381_M-18-381
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-381_M-18-381
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220  Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_18-381_M-18-381
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_18-381_M-18-381
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_18-381_M-18-381
Jeff	Oxley	jeff.oxley@state.mn.us	Office of Administrative Hearings	600 North Robert Street  St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-381_M-18-381
Eric	Pasi	ericp@ips-solar.com	IPS Solar	2670 Patton Rd  Roseville, MN 55113	Electronic Service	No	OFF_SL_18-381_M-18-381

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ben	Passer	Passer@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-381_M-18-381
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive  Belmont, CA 94002	Electronic Service	No	OFF_SL_18-381_M-18-381
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_18-381_M-18-381
Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_18-381_M-18-381
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315  Minneapolis, MN 55415	Electronic Service	No	OFF_SL_18-381_M-18-381
Chris	Psihos	Chris.psihos@idealenergies.com	Ideal Energies, LLC	5810 Nicollet Ave  Minneapolis, MN 55419	Electronic Service	No	OFF_SL_18-381_M-18-381
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	OFF_SL_18-381_M-18-381
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-381_M-18-381
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave  Saint Paul, MN 55105	Electronic Service	No	OFF_SL_18-381_M-18-381



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Doug	Shoemaker	dougs@mnRenewables.org	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_18-381_M-18-381
Zeviel	Simpser	zsimpser@briggs.com	Briggs and Morgan PA	2200 IDS Center80 South Eighth Street Minneapolis, MN 554022157	Electronic Service	No	OFF_SL_18-381_M-18-381
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-381_M-18-381
Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies	5810 Nicollet Ave Minneapolis, Minnesota 55419	Electronic Service	No	OFF_SL_18-381_M-18-381
Byron E.	Starns	byron.starns@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-381_M-18-381
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_18-381_M-18-381
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-381_M-18-381
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_18-381_M-18-381
Anna	Tobin	atobin@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-381_M-18-381
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_18-381_M-18-381

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Tynes	ttynes@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East  Washington, DC 20001	Electronic Service	No	OFF_SL_18-381_M-18-381
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-381_M-18-381
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-381_M-18-381
Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-381_M-18-381
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_18-381_M-18-381
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-381_M-18-381