

215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpco.com (web site)



October 14, 2019

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

**RE: In the Matter of the Annual Filing of Cogeneration and Small Power Production rates for Otter Tail Power Company
Docket No. E999/PR-19-09
Initial Comments**

Dear Mr. Wolf:

Otter Tail Power Company (Otter Tail or Company) provides these Comments in response to the August 30, 2019 Notice of Supplemental Comment Period issued by the Minnesota Public Utilities Commission (Commission), and the subsequent extension dated September 30, 2019.

BACKGROUND

Between January 2 and January 18, 2019, Minnesota Power, Otter Tail, and Xcel Energy, as Minnesota rate-regulated utilities, each filed their annual cogeneration and small power production reports for 2019. Those filings included, per the filing requirements outlined in Minn. Rules Chapter 7835, their respective annual updates to compensation rates for qualifying distributed generation facilities.

On January 29, 2019, Environmental Law and Policy Center and Institute for Local Self Reliance (Joint Commenters) filed comments objecting to the rate-regulated utilities' use of the Commission's "Trade Secret" (non-public) designation for some of the avoided cost information included in the annual cogeneration and small power production tariff filings, *i.e.*, redacted from full public view certain information the individual utilities determined could be used to derive actual or potential independent economic value to others to the detriment of the their customers, consistent with the requirements of the Commission's rules and Minnesota's Data Practices Act, Minnesota Statute Chapter 13.

On February 6, 2019, the Commission issued a notice requesting Minnesota Power, Otter Tail, and Xcel Energy provide justification for those trade secret designations followed by a comment period on the merits of the Joint Commenters' objections. On February 22, 2019, Otter Tail and the other two impacted utilities provided their responses.

By March 8, 2019, initial comments were filed by the Department of Commerce-Division of Energy Resources (Department), Ridge Energy, LLC, and the Joint Commenters. On March 18, 2019, reply comments were filed by Minnesota Power, Xcel Energy, and the Joint Commenters.

On March 19, 2019, the Commission issued its Order Authorizing Further Proceedings in Docket No. E999/CI-16-521 and E-999/CI-01-1023 to develop a written record for considering possible updates to the "Guidelines for Establishing the Terms of the Financial Relationship Between an Electric Utility and a Distributed Generation Customer with No More than 10 MW of Capacity." In addition, that Order requests the rate-regulated utilities in that docket "... file detailed descriptions of how they calculate their DG tariffed rates and negotiated DG rate offerings..." Otter Tail made its compliance filing on May 1, 2019, with additional updates provided June 5 and June 17, 2019.

On August 22, 2019, the Commission met in the instant docket to consider the issues around the utilities' public and trade secret designations in their respective annual cogeneration and small power production filings, including oral argument with Commission questions directed to the Joint Commenters, Minnesota Power, Otter Tail and Xcel Energy. Following deliberations, the Commission requested supplemental comments addressing the topics which were then outlined in its Notice of Supplemental Comment Period dated August 30, 2019 (August 30 Notice). The August 30 Notice states the issue as follows (as applied to Otter Tail):

What, if any, of the trade secret designated information in Otter Tail Power's Annual Cogeneration and Small Power Production reports should be filed as public?

The August 30 Notice states the Topic(s) Open for Comment as follows:

- a. Minnesota Power, Otter Tail Power, and Xcel revised 2019 annual cogeneration and small power production filings' data which each utility has proposed to make public and the rationale for these changes to its former trade secret designation for such changes.
- b. Provide further explanation of how the specific information claimed as trade secret qualifies as such under the Data Practices Act, Minnesota Statute Ch. 13.
- c. Is any of the specific, trade secret-designated information required by the Minnesota rules under part 7835.0500 (Schedule A); part 7835.0600 (Schedule B); and/or part 7835.1000 (Schedule G) are not required by PURPA?

d. Discuss the ‘public inspection’ requirement under PURPA and Minn. Rules 7835.1200 and whether that can be satisfied by granting developers interested in providing generation as qualifying facilities (QFs), and their consultants and advisors, access to the data required by the rules under a Commission-approved non-disclosure agreement.

On September 10, 2019 Otter Tail filed revised Schedules A and B to its annual rate filing on September 10, 2019. The revised filing addressed several revisions to Otter Tail’s prior trade secret designations. There were no changes to the rates, inputs or calculations themselves.

OTTER TAIL’S COMMENTS ON SPECIFIC ISSUES

The following Comments addresses the issue framed by the Commission and are organized along the lines of the Topic(s) Open for Comment iterated in the Commission’s August 30 Notice.

a. Minnesota Power, Otter Tail Power, and Xcel Energy revised 2019 annual cogeneration and small power production filings with the data each utility has proposed to make public and the rationale for these changes to trade secret designation

In its initial January 2019 filing Otter Tail designated certain required schedules (Schedules A, B and G) and Appendix E as not for public disclosure according to Minn. Stat. § 13.37, subd. 1(b). Specifically, Otter Tail designated the following information as trade secret information not for public disclosure:

Otter Tail Appendix C:

- Schedule A (Minn. Rules 7835.0500) - Estimated Marginal Energy Costs 2019-2023.
- Schedule B (Minn. Rules 7835.0600):
 - Subpart 2 – Description of all planned utility generating facility additions planned during the next ten years – All Items A-I.
 - Subpart 3 –Description of all planned firm capacity purchase, other than from quality facilities, during the next ten years – All Items
 - Subpart 4 - Utility’s overall average percentage of line losses due to distribution, transmission, and transformation of electric energy.
 - Subpart 5 – Net Annual Avoided Capacity Cost – All Items
 - Subpart 6 – Net Annual Avoided Capacity Cost – All Items
- Schedule G (Minn. Rules 7835.0600) - Computations and Descriptions

Otter Tail Appendix E:

- Renewable Energy Credits Sales & Purchases used to calculate 2019 Renewable Energy Credit Prices.

Otter Tail explained the basis for this designation in its January filing and again in its February 22, 2019 Reply Comments. Following a full re-examination of its trade secret designations for the relevant data and information, Otter Tail revised its initial filing, making public the following information¹:

- Schedule A - Public: Estimated Marginal Energy Cost column containing the most current year, (i.e. 2019 Rates). These are the rates paid to customers. Also, annual number of hours for the current and forecasted years.
- Schedule B - Public:
 - Subp. 4. Utility's overall average percentage of line losses due to distribution, transmission, and transformation of electric energy.
 - Subp. 5 The Averaged on Peak hours and Average Over All Hours.
 - Subp. 6 The Averaged on Peak hours and Average Over All Hours used to calculate the Net annual avoided capacity cost.

As stated in Otter Tail's September 10, 2019 filing, some of the trade secret designations in the Company's initial January 18, 2019 filing were determined to no longer have an actual or potential basis for competitive harm or deriving independent economic value. Therefore, this information no longer needs to be treated with trade secret protection.

b. Provide further explanation of how the specific information claimed as trade secret qualifies as such under the Data Practices Act, Minnesota Statute Ch. 13.

Otter Tail reaffirms its prior trade secret designations not affected by the Company's September 10, 2019 filing for the reason noted in its prior filings and as stated herein.

The Minnesota Government Data Practices Act (Minn. Stat. § 13.01, *et seq.*) affords protection from public disclosure for trade secret information, defined as follows:

“Trade secret information” means government data, including a formula, pattern, compilation, program, device, method, technique or process (1) that was supplied by the affected individual or organization, (2) that is the subject of efforts by the individual or organization that are reasonable under the circumstances to maintain its secrecy, and (3) that derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use. Minn. Stat. § 13.37(1)(b).

Otter Tail has marked these trade secret items referenced above as trade secret, non-public information under Minn. Stat. § 13.37(1)(b) on the basis that “the schedules are considered to be a ‘compilation’ of data that (1) was supplied by Otter Tail, (2) is the subject of reasonable efforts by Otter Tail to maintain its secrecy, and (3) derives independent economic

¹ *In the Matter of the Annual Filing of Cogeneration and Small Power Production rates for Otter Tail Power , Company Docket No. E999/PR-19-09, Annual Rate Filing – Revised Schedules A and B, September 10, 2019.*

value, actual or potential, from not being generally known to or accessible to the public (as would be required for such a showing under Minn. Stat. § 13.37(1)(b))

Relevant to Otter Tail's position is that the Company was and is actively procuring long-term capacity needs (and in particular the resulting commitment to its Astoria gas-fired generation and Merricourt wind energy projects).

By way of further explanation, Otter Tail's revised Schedule A (Minn. Rules 7835.0500)² protects estimated marginal energy costs for 2020 through 2023, the disclosure of which could aid parties formulating business strategies involving the Company, to the detriment of Otter Tail customers. With respect to Schedule B (Minn. Rules 7835.0600), Subpart 2, Otter Tail has been in the negotiation process for key components that will make up Astoria Station, a planned natural gas generating facility that combined with the Merricourt Wind Project will replace the soon to be retired Hoot Lake Plant. In this context disclosing the exact generating facility details, such as exact turbine size, could provide an negotiating advantage to potential vendors and limit certain aspects of the procurement that may not have been fully negotiated (warranty, service agreements, training, etc.) Schedule B (Minn. Rules 7835.0600), Subpart 3 concerns a description of current and planned firm capacity purchases. Otter Tail has obligations to counterparties to maintain the confidentiality of current agreements. Current and planned capacity purchases is valuable information the disclosure of which could adversely impact Otter Tail's ability to achieve the best possible outcomes for its customers when securing capacity. Schedule B, Subparts 5 and 6 concerns the Company's net annual avoided capacity cost. This relates to updated, non-public information from Otter Tail's Integrated Resource Plan, which could give vendors and suppliers seeking to contract with Otter Tail a bargaining advantage that would tend to increase customer costs. Schedule G (Minn. Rules 7835.0600) concerns Otter Tail's calculation process and is derivative of information protected in other schedules.³

In sum, Otter Tail protects this data so it can procure energy and capacity resources in the most cost-effective manner without disclosing its data to potential vendors, suppliers and others who could use the information to gain a bargaining advantage that would tend to increase customer costs. Vigorously protecting information that affects Otter Tail's bargaining position ultimately is a benefit to customers. In that sense "independent economic value, actual or potential" associated with Otter Tail's protected data accrues to customers, whose interests must be protected in the course of promoting cogeneration and small power production.⁴

² As noted above the Company's revised Schedule A provides public information concerning estimated marginal energy costs for 2019 and the annual number of hours for the current and forecasted years. Estimated marginal energy costs for 2020-2023 remain non-public.

³ Otter Tail has also designated as non-public its Appendix E, which concerns sales and purchase prices of renewable energy credits (RECs) used to calculate 2019 Renewable Energy Credit Prices. This does not appear to be at issue. The same rationale for protecting Schedules A, B, and G also apply to Appendix E.

⁴ Just as with PURPA, a regulatory commission's duty to act in the public interest includes protection of confidential and commercially sensitive information, be that of a utility or a PURPA Qualified Facility (QF). That is especially critical where a utility and others are expected to engage in bilateral energy or capacity power purchase negotiations on a level playing field.

c. Whether any of the specific, trade secret-designated information required by the Minnesota rules under part 7835.0500 (Schedule A); part 7835.0600 (Schedule B); and/or part 7835.1000 (Schedule G) are not required by PURPA?

PURPA's requirements are similar, but not the same as Minnesota's. FERC's PURPA requirements contained at 18 C.F.R. §292.302(b) are for utilities to provide to its State regulatory authority(ies) as follows:

- (1) The estimated avoided cost on the electric utility's system, solely with respect to the energy component, for various levels of purchases from qualifying facilities. Such levels of purchases shall be stated in blocks of not more than 100 megawatts for systems with peak demand of 1000 megawatts or more, and in blocks equivalent to not more than 10 percent of the system peak demand for systems of less than 1000 megawatts. The avoided costs shall be stated on a cents per kilowatt-hour basis, during daily and seasonal peak and off-peak periods, by year, for the current calendar year and each of the next 5 years;
- (2) The electric utility's plan for the addition of capacity by amount and type, for purchases of firm energy and capacity, and for capacity retirements for each year during the succeeding 10 years; and
- (3) The estimated capacity costs at completion of the planned capacity additions and planned capacity firm purchases, on the basis of dollars per kilowatt, and the associated energy costs of each unit, expressed in cents per kilowatt hour. These costs shall be expressed in terms of individual generating units and of individual planned firm purchases.

Any data submitted by an electric utility under this section shall be subject to review by the state regulatory authority which has ratemaking authority over such electric utility.⁵ Under 18 CFR §292.302(d) states are authorized to use an alternative method of compliance where the electric utility may provide data different than that required by 18 CFR §292.302(b) if the state determines that avoided costs can be derived from such data. Minnesota's rules are consistent with 18 CFR §292.302(d). Otter Tail has complied with the State rule, which in turn satisfies PURPA.

d. Discussion of the 'public inspection' requirement under PURPA and Minn. Rules 7835.1200 and whether that can be satisfied by granting developers interested in providing generation as qualifying facilities (QFs), and their consultants and advisors, access to the data required by the rules under a Commission-approved non-disclosure agreement.

⁵ 18 C.F.R. §292.302(e).

The Joint Commenters misconstrue FERC public inspection language. After PURPA's clear delegation of implementation being left to the states, the most important aspect of FERC's PURPA's regulations is that FERC has not recognized the need for, and has explicitly rejected, either additional or less restrictive confidentiality protection procedures specifically for QF applications and related PURPA-required data.⁶ FERC did so not just in individual cases, but in its order promulgating and implementing its PURPA QF regulations.⁷ As with other filings at FERC, under § 388.112 of the Commission's regulations (18 C.F.R. § 388.112), any person or party submitting a document to FERC may request "privileged treatment" (FERC's similar equivalent to Minnesota's "Trade Secret" designation for non-public information) for some or all of its document. While the party requesting privileged treatment must support that claim, none of the material for which confidential treatment is requested will be disclosed unless pursuant to a confidentiality agreement, a protective order, or a finding that material does not warrant confidential treatment.⁸ The FERC does not view what the Joint Commenters refer to as "PURPA's public inspection requirement"⁹ as meriting different treatment for trade secret and other competitively sensitive information of parties that FERC allows for any filings before it, be they utilities, QFs or others. Simply put, FERC recognizes that there is competitively-sensitive information that if placed in the public sphere can negatively impact the goal of a level playing field that benefits customers.

To the extent that a developer had a compelling need to know information that is not already made available by Otter Tail, a non-disclosure agreement could conceptually serve this purpose. It is very difficult, however, to discern what need or basis exists for additional disclosures since Otter Tail already provides its avoided costs rates as part of this annual filing. The availability of a non-disclosure agreement would not alter the rationale for protecting competitively-sensitive information. Therefore, it would not be appropriate to use non-disclosure agreement where there remains the risk of competitively sensitive information being disclosed to parties who may use the information to the detriment of Otter Tail and its customers. While it is conceivable that a non-disclosure agreement could be drawn narrowly enough to avoid such risks much would depend on the particular facts.

Other Considerations

Otter Tail also reiterates that it operates in three state jurisdictions and that it needs to balance the interests of those state regulatory commissions in North and South Dakota. Otter Tail treats the information it has designated as non-public in this docket in the same fashion in its other jurisdictions of South Dakota and North Dakota, which maintain similar trade secret laws. In no instance have the Commissions in these jurisdictions concluded that avoided cost information designated as trade secret is available for public inspection.

⁶ See, e.g., *Revised Regulations Governing Cogeneration and Small Power Production*, FERC Order No. 671, 114 FERC ¶ 61,102, at PP 44, 61 (2006).

⁷ *Id.* (FERC Order No. 671 is FERC's 2006 rulemaking done pursuant to section 1253 of the Energy Policy Act of 2005 (EPA Act 2005) and section 210 of PURPA to revise 18 CFR parts 131 and 292 to implement amended regulations governing qualifying cogeneration and small power production facilities.)

⁸ *Id.* at P 61.

⁹ Joint Commenters' Corrected Comments filed Jan. 29, 2019 at 3 and n.2 (citing 45 Fed. Reg. 12214, 12218 (1980)).

Finally, Otter Tail again questions the Joint Commenters' rationale for the public disclosure of trade secret information. Otter Tail's filing produces published avoided cost rates, which presumably is the key metric for parties considering cogeneration and small power production opportunities. In sum, the Joint Commenters have not provided a legal or policy basis supporting public access to protected information.

We are available to provide any additional information or respond to any questions you may have. Feel free to contact me at (218) 739-8722 or email me at kdahl@otpc.com.

Sincerely,

/s/ KRISTIAN DAHL
Kristian Dahl
Associate General Counsel

cjh
Enclosures
By electronic filing
cc: Service List

CERTIFICATE OF SERVICE

**RE: In the Matter of the Annual Filing of Cogeneration and Small Power Production rates for Otter Tail Power Company
Docket No. E999/PR-19-09**

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

**Otter Tail Power Company
Initial Comments**

Dated this 14th day of **October, 2019**

/s/ CARLY HAIBY

Carly Haiby, Regulatory Filings Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8472

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_19-9_Official
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St Denver, CO 80204-8020	Electronic Service	No	OFF_SL_19-9_Official
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-9_Official
Sara	Baldwin Auck	sarab@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156 Latham, NY 12110	Electronic Service	No	OFF_SL_19-9_Official
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-9_Official
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-9_Official
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-9_Official
Kathleen M.	Brennan	kmb@mcgrannshea.com	McGrann Shea Carnival, Straughn & Lamb, Chartered	800 Nicollet Mall Ste 2600 Minneapolis, MN 554027035	Electronic Service	No	OFF_SL_19-9_Official
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-9_Official
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-9_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_19-9_Official
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-9_Official
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_19-9_Official
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_19-9_Official
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_19-9_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-9_Official
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Solar	14333 Orchard Rd. Minnetonka, MN 55345	Electronic Service	No	OFF_SL_19-9_Official
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_19-9_Official
James	Darabi	james.darabi@solarfarm.com	Solar Farm, LLC	2355 Fairview Ave #101 St. Paul, MN 55113	Electronic Service	No	OFF_SL_19-9_Official
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-9_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_19-9_Official
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_19-9_Official
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-9_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_19-9_Official
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_19-9_Official
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_19-9_Official
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_19-9_Official
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-9_Official
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_19-9_Official
Timothy	Gulden	timothy.gulden@yahoo.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	OFF_SL_19-9_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tony	Hainault	anthony.hainault@co.henn epin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_19-9_Official
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-9_Official
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_19-9_Official
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_19-9_Official
Brian	Jeremiason	bjeremiason@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.	205 W. Hwy. 14 Tyler, MN 56178	Electronic Service	No	OFF_SL_19-9_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-9_Official
Michael	Kampmeyer	mkampmeyer@a-e- group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_19-9_Official
Kevin	Keene	kevin.keene@cummins.co m		N/A	Electronic Service	No	OFF_SL_19-9_Official
Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave Ste 200 Lakeville, MN 55044	Paper Service	No	OFF_SL_19-9_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_19-9_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jon	Kramer	sundialjon@gmail.com	Sundial Solar	3209 W 76th St Edina, MN 55435	Electronic Service	No	OFF_SL_19-9_Official
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_19-9_Official
Jeffrey L.	Landsman	jlandsman@wheelerlaw.com	Wheeler, Van Sickle & Anderson, S.C.	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_19-9_Official
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Wayzata, MN 55391	Electronic Service	No	OFF_SL_19-9_Official
Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products	PO Box 108 Springfield, MN 56087	Electronic Service	No	OFF_SL_19-9_Official
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200 Minneapolis, MN 55420	Electronic Service	No	OFF_SL_19-9_Official
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_19-9_Official
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_19-9_Official
Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-9_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-9_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-9_Official
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-9_Official
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_19-9_Official
Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-9_Official
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_19-9_Official
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_19-9_Official
Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-9_Official
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_19-9_Official
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-9_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-9_Official
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_19-9_Official
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_19-9_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-9_Official
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-9_Official
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_19-9_Official
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-9_Official
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-9_Official
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_19-9_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-9_Official
Thomas P.	Sweeney III	tom.sweeney@easycleane nergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_19-9_Official
Lynnette	Sweet	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-9_Official
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_19-9_Official
Sam	Villella	sdvillella@gmail.com		10534 Alamo Street NE Blaine, MN 55449	Electronic Service	No	OFF_SL_19-9_Official
Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind	618 2nd Ave SE Minneapolis, MN 55414	Electronic Service	No	OFF_SL_19-9_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_19-9_Official
Thomas J.	Zaremba	TZaremba@wheelerlaw.co m	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_19-9_Official