

August 16, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

**RE: Response of the Minnesota Department of Commerce, Division of Energy Resources
Regarding Tariff Rate for Net Cost of CSG Generation**
Docket Nos. E002/CI-23-335, E002/M-13-867, E002/AA-24-63

Dear Mr. Seuffert:

Attached is the response of the Minnesota Department of Commerce, Division of Energy Resources (Department) to Xcel Energy's Motion in the following matters:

In the Matter of Implementation of 2023 Legislative Changes to Xcel Energy's Community Solar Garden Program; In the Matter of Northern States Power Company, dba Xcel Energy, for Approval of its Proposed Community Solar Garden Program; and In the Matter of the Petition of Northern States Power Company for Approval of the 2025 Annual Fuel Forecast and Monthly Fuel Cost Charges

The Motion was filed on August 2, 2024 by Xcel Energy.

The Department provides its recommendations in the attached response. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. Sydnie Lieb
Assistant Commissioner of Regulatory Analysis

SL/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. E002/CI-23-335, E002/M-13-867, E002/AA-24-63

I. INTRODUCTION

The Department provides its response to Xcel Energy's August 2, 2024 Motion regarding the tariff rate for net cost of Community Solar Garden (CSG) generation.¹ In its Motion, Xcel proposes to establish a 2025 net cost of CSG generation rate in its tariff, to remove obsolete language in the tariff regarding the systems necessary to apply the rate, and to establish the process for updates to the rate in the annual fuel forecast dockets. The Department is supportive of the proposals outlined in the Motion and provides additional recommendations below.

II. PROCEDURAL HISTORY

On August 28, 2023, Xcel Energy proposed a calculation for the net cost of CSG generation for exclusion from eligible customer bills to comply with Minn. Stat. § 216B.1641, Subd. 11.²

On December 28, 2023, the Commission issued its Order which approved Xcel's proposed calculation in Order Point 5C.³

On January 5, 2024, Xcel filed the proposed tariff language regarding the exclusion of the net cost of CSG generation, in compliance with the December 28, 2023 Order, with a placeholder for a future Commission authorized rate in tariff sheet 5-91.4.⁴

¹ Motion – Regarding Tariff Rate for Net Cost of CSG Generation, Northern States Power Company dba Xcel Energy, In the Matter of Implementation of 2023 Legislative Changes to Xcel Energy's Community Solar Garden Program; In the Matter of Northern States Power Company, dba Xcel Energy, for Approval of its Proposed Community Solar Garden Program; and In the Matter of the Petition of Northern States Power Company for Approval of the 2025 Annual Fuel Forecast and Monthly Fuel Cost Charges, Docket Nos. E002/CI-23-335, E002/M-13-867, E002/AA-24-63 (August 2, 2024). (eDocket No. [20248-209228-01](#)). Hereinafter "Motion."

² Response, Northern States Power Company dba Xcel Energy, In the Matter of Implementation of 2023 Legislative Changes to Xcel Energy's Community Solar Garden Program; In the Matter of Northern States Power Company, dba Xcel Energy, for Approval of its Proposed Community Solar Garden Program, Docket Nos. E002/CI-23-335, E002/M-13-867 (August 28, 2023). (eDocket No. [20238-198558-01](#)). Hereinafter "August 28, 2023 Response."

³ Order Implementing New Legislation Governing Community Solar Gardens, In the Matter of Implementation of 2023 Legislative Changes to Xcel Energy's Community Solar Garden Program; In the Matter of Northern States Power Company, dba Xcel Energy, for Approval of its Proposed Community Solar Garden Program, Docket Nos. E002/CI-23-335, E002/M-13-867 (December 28, 2023). (eDocket No. [202312-201621-02](#)). Hereinafter "December 28, 2023 Order."

⁴ Compliance Filing – Tariffs, Northern States Power Company dba Xcel Energy, In the Matter of Implementation of 2023 Legislative Changes to Xcel Energy's Community Solar Garden Program, Docket No. E002/CI-23-335 (January 5, 2024). (eDocket No. [20241-201888-01](#)). Hereinafter "January 5, 2024 Compliance Filing."

On May 1, 2024, Xcel filed its annual fuel forecast and fuel clause adjustment (FCA) filing, which included proposed CSG above market costs and a proposed rate for the exclusion of the net cost of CSG generation of 0.679 cent per kWh.⁵

On May 30, 2024, the Commission issued its Order approving and amending certain tariff sheets filed January 5, 2024 and requiring Xcel to file amended tariff sheets in compliance with the Order.⁶

On June 7, 2024, Xcel filed amended tariff sheets in compliance with the May 30, 2024 Order, including tariff sheet 5-91.4 with a placeholder for a future Commission authorized rate for the exclusion of the net cost of CSG generation.⁷

On July 31, 2024, Xcel filed reply comments in the FCA docket which updated the forecasted CSG above market costs and the proposed rate for the exclusion of the net cost of CSG generation of 0.681 cent per kWh.⁸

On August 2, 2024, Xcel filed a Motion to incorporate the proposed rate for the exclusion of the net cost of CSG generation from the FCA docket and a process for the approval of future updates to the rate.

The Motion requested Commission approval of the following:

- That the Commission approve the proposed net cost of generation rate for inclusion on Tariff Sheet No. 5-91.4, with an effective date of January 1, 2025;
- That the following language be removed from Tariff Sheet No. 5-91.4:
This credit will start to apply and appear on customer bills only after the Company has systems in place to provide this credit and application of this credit will be done only a prospective basis after the Company has systems in place.
- That future changes to this rate be changed on a calendar year cadence, with future proposed changes to be made only in future Fuel Forecast dockets and not in the CSG dockets (E002/CI-23-335 and E002/M-13-867), unless if the Commission orders otherwise.⁹

⁵ *Petition, Northern States Power Company dba Xcel Energy, In the Matter of the Petition of Northern States Power Company for Approval of the 2025 Annual Fuel Forecast and Monthly Fuel Cost Charges, Docket No. E002/AA-24-63* (May 1, 2024). (eDocket No. [20245-206297-01](#)). Hereinafter “May 1, 2024 Petition.”

⁶ *Order Implementing New Legislation Governing Community Solar Gardens, In the Matter of Implementation of 2023 Legislative Changes to Xcel Energy’s Community Solar Garden Program; In the Matter of Northern States Power Company, dba Xcel Energy, for Approval of its Proposed Community Solar Garden Program, Docket Nos. E002/CI-23-335, E002/M-13-867* (May 30, 2024). (eDocket No. [20245-207236-01](#)). Hereinafter “May 30, 2024 Order.”

⁷ *Compliance Filing, Northern States Power Company dba Xcel Energy, In the Matter of Implementation of 2023 Legislative Changes to Xcel Energy’s Community Solar Garden Program, Docket No. E002/CI-23-335* (June 7, 2024). (eDocket No. [20246-207508-01](#)). Hereinafter “June 7, 2024 Compliance Filing.”

⁸ *Reply Comments, Northern States Power Company dba Xcel Energy, In the Matter of the Petition of Northern States Power Company for Approval of the 2025 Annual Fuel Forecast and Monthly Fuel Cost Charges, Docket No. E002/AA-24-63* (July 31, 2024). (eDocket No. [20247-209157-01](#)). Hereinafter “July 31, 2024 Reply Comments.”

⁹ Motion at 4.

III. DEPARTMENT ANALYSIS

The Department responds to each of the proposals from Xcel's Motion below.

A. PROPOSED RATE

Minn. Stat. § 216B.1641, Subd. 11 requires the exclusion of the "net cost of community solar garden generation" for eligible customers:

Subd. 11. Nonsubscriber protections.

(a) A utility must exclude from the fuel adjustment charged to a utility customer the net cost of community solar garden generation under this section if the utility customer (1) receives or is eligible for bill payment assistance, and (2) does not subscribe to a community solar garden under this section.

(b) The commission must determine the net cost of community solar garden generation under this section for purposes of paragraph (a).¹⁰

The Commission is tasked with determining the net cost of CSG generation under Minn. Stat. § 216B.1641, Subd. 11(b), which was incorporated into a Commission proceeding to implement 2023 legislative changes to the CSG statute in Docket No. E002/CI-23-335. In the proceeding, Xcel proposed to determine the net cost of CSG generation based on the above location marginal price (LMP) market CSG costs that are calculated in the annual FCA docket.¹¹ Xcel proposed to determine the net cost of CSG generation using the above market CSG costs from the FCA docket as follows:

$$\text{Residential Above LMP Market Cost of CSG generation per kWh} = \frac{\text{Above LMP Market Cost Allocation to Residential}}{\text{Residential Sales (kWh)}}^{12}$$

The December 28, 2023 Order approved Xcel's proposed calculation: "Regarding implementation of the ratepayer protections set forth in Minn. Stat. § 216B.1641, Subd. 11 – Xcel's proposal for determining and applying the net cost of generation for CSGs is sufficient to meet the specific rate design objective of the statute."¹³

Xcel filed a petition on May 1, 2024 in the annual FCA docket which included the forecast of above market CSG costs for 2025, calculated the net cost of CSG generation based on the above market CSG costs as 0.679 cent per kWh, and requested approval of the exclusion rate.¹⁴ Xcel subsequently updated its 2025

¹⁰ [Minn. Stat. § 216B.1641, Subd. 11](#)

¹¹ August 28, 2023 Response at 22-23.

¹² August 28, 2023 Response at 23.

¹³ December 28, 2023 Order at Order Point 5C.

¹⁴ May 1, 2024 Petition at 14-15.

fuel forecast and above market CSG costs in reply comments and revised its calculated net cost of CSG generation to 0.681 cent per kWh.¹⁵

Xcel's Motion, filed soon after the July 31, 2024 Reply Comments, utilizes the exclusion rate of 0.681 cent per kWh calculated in the FCA reply comments as the proposed rate for inclusion in tariff sheet 5-91.4.¹⁶

Xcel's calculation methodology for the net cost of CSG generation in the FCA docket appears consistent with the methodology approved by the December 28, 2023 Order. The 2025 fuel forecast and FCA, including the above market CSG costs and net cost of CSG generation, will be established in the FCA docket on the procedural schedule set forth in Appendix A of the June 12, 2019 Order in Docket No. E999/CI-03-802.¹⁷ The procedural schedule establishes that a Commission Order on 2025 rates be issued by November 29, 2024, with rates published by December 1, 2024 and implemented January 1, 2025.

The Department supports utilizing the net cost of CSG generation rate approved by the Commission later this year in the FCA docket for inclusion in tariff sheet 5-91.4, with an effective date of January 1, 2025. The Department also recommends the Commission require Xcel to update the tariff sheet to reflect the rate approved by the Commission in the FCA docket and provide the updated final tariff sheet in its compliance filing due within 10 days after the Order approving 2025 FCA rates is issued.

B. TARIFF LANGUAGE REMOVAL

In Xcel's proposed and approved tariff sheet 5-91.4, Xcel includes the following language: "This credit will start to apply and appear on customer bills only after the Company has systems in place to provide this credit and application of this credit will be done only a prospective basis after the Company has systems in place."¹⁸ In its cover letter to the January 5, 2024 Compliance Filing, Xcel noted that it did not yet have systems in place to provide the required credit.¹⁹ In its Motion, Xcel states it expects to have systems in place to apply the exclusion to eligible customers on January 1, 2025, coinciding with the requested effective date for the proposed rate and the anticipated implementation date of the 2025 FCA upon approval in Docket No. E002/AA-24-63.²⁰

With the coinciding implementation on January 1, 2025 of the exclusion rate, the 2025 FCA, and the necessary systems to apply the exclusion rate, the above language in tariff sheet 5-91.4 is no longer necessary. Accordingly, the Department supports Xcel's request to remove the above language from tariff sheet 5-91.4.

¹⁵ July 31, 2024 Reply Comments at 7-8.

¹⁶ Motion at 3.

¹⁷ *Order Approving Additional Details of New Fuel Clause Adjustment Process, In the Matter of an Investigation into the Appropriateness of Continuing to Permit Electric Energy Cost Adjustments, Docket No. E999/CI-03-802* (June 12, 2019). (eDocket No. [20196-153514-01](#)).

¹⁸ June 7, 2024 Compliance Filing, Attachment A at tariff sheet 5-91.4.

¹⁹ January 5, 2024 Compliance Filing at 3.

²⁰ Motion at 3.

C. *FUTURE RATE UPDATES*

Xcel proposes that future updates to the net cost of CSG generation be done annually in the FCA docket, not in the CSG dockets, and be incorporated into the annual true-up process:

Because the CSG exemption rate is a component of fuel costs, the Company proposes that annual updates to this rate be made in the annual fuel forecast dockets due by May 1 of each year, and not in the CSG dockets (E002/CI-23-335 and E002/M-13-867). Forecasted rates would include the proposed exemption and the filing would include the proposed tariff sheet reflecting the proposed rate. Final reports showing the actual excluded amount for the prior calendar year would be shown in the True-Up Reports filed on March 1 each year following the conclusion of that forecast year. Since the methodology by which this rate is calculated has already been approved by the Commission, the Company believes the implementation process would be streamlined by filing the annual updated rate only in the fuel forecast dockets and not in the CSG dockets.²¹

The Department supports Xcel's proposal to incorporate updates to the net cost of CSG generation in the FCA docket. Minn. Stat. § 216B.1641, Subd. 11(a) explicitly contemplates nonsubscriber protections as an exclusion from the FCA for eligible customers.²² The calculation methodology for the net cost of CSG generation approved by the Commission is also directly connected to the above market CSG costs established in the FCA docket. Incorporating the net cost of CSG generation updates in the existing process of the FCA docket also provides efficiencies for the regulatory process. Accordingly, the Department believes the FCA docket is the appropriate venue to consider the net cost of CSG generation and update the rate on the established cadence.

To provide greater transparency regarding the calculation of the net cost of CSG generation in the FCA docket and to ensure the calculation complies with the Commission's approved methodology, the Department requests that Xcel provide its calculations of the net cost of CSG generation as an attachment to its FCA filings moving forward.

²¹ *Ibid.*

²² [Minn. Stat. § 216B.1641, Subd. 11\(a\).](#)

IV. CONCLUSION AND RECOMMENDATIONS

Based on review and analysis of Xcel's Motion, the Department supports the proposals Xcel put forth in its Motion and provides the following recommendations:

- The Department recommends the Commission approve the proposed net cost of generation rate for inclusion on Tariff Sheet No. 5-91.4, with an effective date of January 1, 2025;
- The Department recommends the Commission require Xcel to update Tariff Sheet No. 5-91.4 to reflect the rate approved by the Commission in Docket No. E002/AA-24-63 and provide the updated final tariff sheet in its compliance filing within 10 days of the Order approving 2025 rates being issued;
- The Department recommends the Commission approve that the following language be removed from Tariff Sheet No. 5-91.4:

This credit will start to apply and appear on customer bills only after the Company has systems in place to provide this credit and application of this credit will be done only a prospective basis after the Company has systems in place.
- The Department recommends the Commission approve that future changes to this rate be changed on a calendar year cadence, with future proposed changes to be made only in future Fuel Forecast dockets and not in the CSG dockets (E002/CI-23-335 and E002/M-13-867), unless if the Commission orders otherwise.
- The Department recommends the Commission require Xcel to provide the calculations of the proposed net cost of generation rate as an attachment in the Fuel Forecast dockets.

CERTIFICATE OF SERVICE

I, Nicole Westling, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce

Response

Docket Nos. E002/CI-23-335, E002/M-13-867, E002/AA-24-63

Dated this **16th** day of **August 2024**

/s/Nicole Westling

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| David | Shaffer | david.shaffer@novelenergy.biz | Novel Energy Solutions | 2303 Wycliff St Ste 300 St. Paul, MN 55114 | Electronic Service | No | OFF_SL_23-335_Official |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|-----------|---|---|---|--------------------|-------------------|------------------------|
| Christopher L. | Sherman | csherman@sherman-associates.com | Solar Holdings LLC | 233 Park Ave S Ste 201 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_23-335_Official |
| Doug | Shoemaker | dougs@charter.net | Minnesota Renewable Energy | 2928 5th Ave S Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_23-335_Official |
| 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_23-335_Official |
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_23-335_Official |
| Whitney | Terrill | whitney@mnipl.org | Minnesota Interfaith Power & Light | N/A | Electronic Service | No | OFF_SL_23-335_Official |
| Anna | Tobin | atobin@greeneespel.com | Greene Espel PLLP | 222 South Ninth Street Suite 2200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_23-335_Official |
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| Pat | Treseler | pat.jcplaw@comcast.net | Paulson Law Office LTD | 4445 W 77th Street Suite 224 Edina, MN 55435 | Electronic Service | No | OFF_SL_23-335_Official |
| John | Vaughn | Nik@real.org | Rural Renewable Energy Alliance | 3963 8th Street SW Backus, MN 55435 | Electronic Service | No | OFF_SL_23-335_Official |
| Kevin | Walker | KWalker@beaconinterfaith.org | Beacon Interfaith Housing Collaborative | N/A | Electronic Service | No | OFF_SL_23-335_Official |
| Jenna | Warmuth | jwarmuth@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 55802-2093 | Electronic Service | No | OFF_SL_23-335_Official |

| 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 |
|------------|-----------------|----------------------------------|--------------------------------|--|--------------------|-------------------|------------------------|
| 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_13-867_Official |
| Daniel | Abelson | daniel.abelson@metc.state.mn.us | Metropolitan Council | 390 Robert Street N. St. Paul, MN 55101 | Electronic Service | No | OFF_SL_13-867_Official |
| Michael | Allen | michael.allen@allenergysolar.com | All Energy Solar | 721 W 26th st Suite 211 Minneapolis, MN 55405 | Electronic Service | No | OFF_SL_13-867_Official |
| David | Amster Olzweski | david@mysunshare.com | SunShare, LLC | 1151 Bannock St Denver, CO 80204-8020 | 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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| 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_13-867_Official |
| City | Clerk | gregg.engdahl@ci.stcloud.mn.us | City of St. Cloud | 400 Second St. S St. Cloud, MN 56301 | Electronic Service | No | OFF_SL_13-867_Official |
| 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_13-867_Official |
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| George | Damian | gdamian@cleanenergyeconomymn.org | Clean Energy Economy MN | 13713 Washburn Ave S Burnsville, MN 55337 | Electronic Service | No | OFF_SL_13-867_Official |
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| James | Denniston | james.r.denniston@xcelenergy.com | Xcel Energy Services, Inc. | 414 Nicollet Mall, 401-8 Minneapolis, MN 55401 | 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 |
|------------|-----------|-----------------------------------|-------------------------------------|---|--------------------|-------------------|------------------------|
| Ian M. | Dobson | ian.m.dobson@xcelenergy.com | Xcel Energy | 414 Nicollet Mall, 401-8 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_13-867_Official |
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| Betsy | Engelking | betsy@nationalgridrenewables.com | National Grid Renewables | 8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437 | Electronic Service | No | OFF_SL_13-867_Official |
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|------------|------------------|-----------------------------|--------------------------------------|--|--------------------|-------------------|------------------------|
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|--------------------------------|-----------------------------------|---|--------------------|-------------------|------------------------|
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| Aaron | Knoll | aknoll@greeneespel.com | Greene Espel PLLP | 222 South Ninth Street Suite 2200 Minneapolis, MN 55402 | 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 |
|------------|---------------|---------------------------------|-------------------------------------|--|--------------------|-------------------|------------------------|
| Dean | Leischow | dean@sunrisenrg.com | Sunrise Energy Ventures | 315 Manitoba Ave Ste 200 Wayzata, MN 55391 | Electronic Service | No | OFF_SL_13-867_Official |
| Annie | Levenson Falk | annief@cupminnesota.org | Citizens Utility Board of Minnesota | 332 Minnesota Street, Suite W1360 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_13-867_Official |
| Alice | Madden | alice@communitypowermn.org | Community Power | 2720 E 22nd St Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_13-867_Official |
| Gregg | Mast | gmast@cleanenergyeconomyymn.org | Clean Energy Economy Minnesota | 4808 10th Avenue S Minneapolis, MN 55417 | Electronic Service | No | OFF_SL_13-867_Official |
| Jason | Maur | jason.maur@renesolapower.com | Renosola Power Holdings, LLC | 850 Canal Street 3rd Floor Stamford, CT 06902 | Electronic Service | No | OFF_SL_13-867_Official |
| 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 |
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| Brian | Millberg | fwengineering@comcast.net | | 695 Grand Ave #222 Saint Paul, MN 55105 | Electronic Service | No | OFF_SL_13-867_Official |
| Marc | Miller | mmiller@soltage.com | Soltage, LLC | 66 York Street, 5th Floor Jersey City, NJ 07302 | Electronic Service | No | OFF_SL_13-867_Official |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|------------------------------------|---|---|--------------------|-------------------|------------------------|
| Marcus | Mills | Marcus@communitypowermn.org | Community Power | 2720 E 22nd St Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_13-867_Official |
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_13-867_Official |
| Pouya | Najmaie | pouya@cooperativeenergyfutures.com | Cooperative Energy Futures | 3416 16th Ave S Minneapolis, MN 55407 | Electronic Service | No | OFF_SL_13-867_Official |
| Darin | Nelson | dnelson@minnetonkamn.gov | City of Minnetonka | 14600 Minnetonka Blvd Minnetonka, MN 55345 | Electronic Service | No | OFF_SL_13-867_Official |
| Rolf | Nordstrom | rnordstrom@gpisd.net | Great Plains Institute | 2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229 | Electronic Service | No | OFF_SL_13-867_Official |
| 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 |
| 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_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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| 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_13-867_Official |
| Morgan | Pitz | morgan.pitz@us-solar.com | US Solar | 100 N 6th St #410B Minneapolis, MN 55403 | Electronic Service | No | OFF_SL_13-867_Official |
| Kristel | Porter | kristel@mnrenewablenow.org | MN Renewable Now | N/A | Electronic Service | No | OFF_SL_13-867_Official |
| Paula | Prahl | paula.prahl@dominiuminc.com | Dominium | 2905 Northwest Blvd Ste 150 Plymouth, MN 55441 | Electronic Service | No | OFF_SL_13-867_Official |
| Bridget | Rathsack | bridget.rathsack@burnsvill emn.gov | City of Burnsville, MN | 100 Civic Center Parkway Burnsville, MN 55337 | Electronic Service | No | OFF_SL_13-867_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_13-867_Official |
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| Isabel | Ricker | ricker@fresh-energy.org | Fresh Energy | 408 Saint Peter Street Suite 220 Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_13-867_Official |

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|----------------|--------------|-----------------------------------|--------------------------------|---|--------------------|-------------------|------------------------|
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| Christine | Schwartz | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | No | OFF_SL_13-867_Official |
| Will | Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7th PI E Ste 350 Saint Paul, MN 55101 | Electronic Service | Yes | OFF_SL_13-867_Official |
| David | Shaffer | david.shaffer@novelenergy.biz | Novel Energy Solutions | 2303 Wycliff St Ste 300 St. Paul, MN 55114 | Electronic Service | No | OFF_SL_13-867_Official |
| Christopher L. | Sherman | csherman@sherman-associates.com | Solar Holdings LLC | 233 Park Ave S Ste 201 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_13-867_Official |
| Doug | Shoemaker | dougs@charter.net | Minnesota Renewable Energy | 2928 5th Ave S Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_13-867_Official |
| Karl | Sonneman | karl17@hbci.com | Law Office of Karl W. Sonneman | 111 Riverfront Suite 202 Winona, MN 55987 | Electronic Service | No | OFF_SL_13-867_Official |
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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_13-867_Official |
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| Whitney | Terrill | whitney@mnipl.org | Minnesota Interfaith Power & Light | N/A | Electronic Service | No | OFF_SL_13-867_Official |
| Anna | Tobin | atobin@greeneespel.com | Greene Espel PLLP | 222 South Ninth Street Suite 2200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_13-867_Official |
| Zack | Townsend | zachary.townsend@brookfielddrenewable.com | Brookfield Renewable | 200 Liberty St FL 14 New York, NY 10281 | Electronic Service | No | OFF_SL_13-867_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_13-867_Official |
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| John | Vaughn | Nik@rreal.org | Rural Renewable Energy Alliance | 3963 8th Street SW Backus, MN 55435 | Electronic Service | No | OFF_SL_13-867_Official |
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| Kevin | Walker | KWalker@beaconinterfaith.org | Beacon Interfaith Housing Collaborative | N/A | Electronic Service | No | OFF_SL_13-867_Official |
| Jenna | Warmuth | jwarmuth@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 55802-2093 | Electronic Service | No | OFF_SL_13-867_Official |

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|----------------|--------------------|-----------------------------------|--|---|--------------------|-------------------|-----------------------|
| Kevin | Adams | kadams@caprw.org | Community Action Partnership of Ramsey & Washington Counties | 450 Syndicate St N Ste 35 Saint Paul, MN 55104 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
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| Elizabeth | Brama | ebrama@taftlaw.com | Taft Stettinius & Hollister LLP | 2200 IDS Center 80 South 8th Street Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
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| John | Coffman | john@johncoffman.net | AARP | 871 Tuxedo Blvd. St. Louis, MO 63119-2044 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| 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_24-63_AA-24-63 |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|-------------|-----------|--------------------------------------|-------------------------------------|--|--------------------|-------------------|-----------------------|
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| Richard | Dornfeld | Richard.Dornfeld@ag.state.mn.us | Office of the Attorney General-DOC | Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, MN 55101 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Christopher | Droske | christopher.droske@minneapolismn.gov | City of Minneapolis | 661 5th Ave N Minneapolis, MN 55405 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Brian | Edstrom | briane@cubminnesota.org | Citizens Utility Board of Minnesota | 332 Minnesota St Ste W1360 Saint Paul, MN 55101 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Rebecca | Eilers | rebecca.d.eilers@xcelenergy.com | Xcel Energy | 414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401 | Electronic Service | Yes | OFF_SL_24-63_AA-24-63 |
| John | Farrell | jfarrell@ilsr.org | Institute for Local Self-Reliance | 2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| 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_24-63_AA-24-63 |

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| Lucas | Franco | lfranco@liunagroc.com | LIUNA | 81 Little Canada Rd E Little Canada, MN 55117 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Edward | Garvey | garveyed@aol.com | Residence | 32 Lawton St Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Edward | Garvey | edward.garvey@AESLconsulting.com | AESL Consulting | 32 Lawton St Saint Paul, MN 55102-2617 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Shubha | Harris | Shubha.M.Harris@xcelenergy.com | Xcel Energy | 414 Nicollet Mall, 401 - FL 8 Minneapolis, MN 55401 | Electronic Service | Yes | OFF_SL_24-63_AA-24-63 |
| Matthew B | Harris | matt.b.harris@xcelenergy.com | XCEL ENERGY | 401 Nicollet Mall FL 8 Minneapolis, MN 55401 | Electronic Service | Yes | OFF_SL_24-63_AA-24-63 |
| Amber | Hedlund | amber.r.hedlund@xcelenergy.com | Northern States Power Company dba Xcel Energy-Elec | 414 Nicollet Mall, 401-7 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Adam | Heinen | aheinen@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Katherine | Hinderlie | katherine.hinderlie@ag.state.mn.us | Office of the Attorney General-DOC | 445 Minnesota St Suite 1400 St. Paul, MN 55101-2134 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Michael | Hoppe | lu23@ibew23.org | Local Union 23, I.B.E.W. | 445 Etna Street Ste. 61 St. Paul, MN 55106 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Geoffrey | Inge | ginge@regintl.com | Regulatory Intelligence LLC | PO Box 270636 Superior, CO 80027-9998 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |

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| Alan | Jenkins | aj@jenkinsatlaw.com | Jenkins at Law | 2950 Yellowtail Ave. Marathon, FL 33050 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Richard | Johnson | Rick.Johnson@lawmoss.com | Moss & Barnett | 150 S. 5th Street Suite 1200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Sarah | Johnson Phillips | sarah.phillips@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| 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_24-63_AA-24-63 |
| Michael | Krikava | mkrikava@taftlaw.com | Taft Stettinius & Hollister LLP | 2200 IDS Center 80 S 8th St Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Carmel | Laney | carmel.laney@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Peder | Larson | plarson@larkinhoffman.com | Larkin Hoffman Daly & Lindgren, Ltd. | 8300 Norman Center Drive Suite 1000 Bloomington, MN 55437 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Annie | Levenson Falk | annief@cupminnesota.org | Citizens Utility Board of Minnesota | 332 Minnesota Street, Suite W1360 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Ryan | Long | ryan.j.long@xcelenergy.com | Xcel Energy | 414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401 | Electronic Service | Yes | OFF_SL_24-63_AA-24-63 |
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| Alice | Madden | alice@communitypowermn.org | Community Power | 2720 E 22nd St Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Kavita | Maini | kmains@wi.rr.com | KM Energy Consulting, LLC | 961 N Lost Woods Rd Oconomowoc, WI 53066 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Mary | Martinka | mary.a.martinka@xcelenergy.com | Xcel Energy Inc | 414 Nicollet Mall 7th Floor Minneapolis, MN 55401 | Electronic Service | Yes | OFF_SL_24-63_AA-24-63 |
| Erica | McConnell | emcconnell@elpc.org | Environmental Law & Policy Center | 35 E. Wacker Drive, Suite 1600 Chicago, IL 60601 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Stacy | Miller | stacy.miller@minneapolismn.gov | City of Minneapolis | 350 S. 5th Street Room M 301 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Christa | Moseng | christa.moseng@state.mn.us | Office of Administrative Hearings | P.O. Box 64620 Saint Paul, MN 55164-0620 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| David | Niles | david.niles@avantenergy.com | Minnesota Municipal Power Agency | 220 South Sixth Street Suite 1300 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Carol A. | Overland | overland@legalectric.org | Legalelectric - Overland Law Office | 1110 West Avenue Red Wing, MN 55066 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |

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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_24-63_AA-24-63 |
| 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_24-63_AA-24-63 |
| Amanda | Rome | amanda.rome@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 5 Minneapolis, MN 55401 | Electronic Service | Yes | OFF_SL_24-63_AA-24-63 |
| Joseph L | Sathe | jsathe@kennedy-graven.com | Kennedy & Graven, Chartered | 150 S 5th St Ste 700 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Elizabeth | Schmiesing | eschmiesing@winthrop.com | Winthrop & Weinstine, P.A. | 225 South Sixth Street Suite 3500 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Peter | Scholtz | peter.scholtz@ag.state.mn.us | Office of the Attorney General-RUD | Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Christine | Schwartz | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | Yes | OFF_SL_24-63_AA-24-63 |
| Will | Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7th PI E Ste 350 Saint Paul, MN 55101 | Electronic Service | Yes | OFF_SL_24-63_AA-24-63 |
| Janet | Shaddix Elling | jshaddix@janetshaddix.com | Shaddix And Associates | 7400 Lyndale Ave S Ste 190 Richfield, MN 55423 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | 76 W Kellogg Blvd St. Paul, MN 55102 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |

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| Joshua | Smith | joshua.smith@sierraclub.org | | 85 Second St FL 2 San Francisco, CA 94105 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Beth | Soholt | bsoholt@cleangridalliance.org | Clean Grid Alliance | 570 Asbury Street Suite 201 St. Paul, MN 55104 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Byron E. | Starns | byron.starns@stinson.com | STINSON LLP | 50 S 6th St Ste 2600 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Scott | Strand | SStrand@elpc.org | Environmental Law & Policy Center | 60 S 6th Street Suite 2800 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| James M | Strommen | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered | 150 S 5th St Ste 700 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Carla | Vita | carla.vita@state.mn.us | MN DEED | Great Northern Building 12th Floor 180 East Fifth Street St. Paul, MN 55101 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Joseph | Windler | jwindler@winthrop.com | Winthrop & Weinstine | 225 South Sixth Street, Suite 3500 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
| Kurt | Zimmerman | kwz@ibew160.org | Local Union #160, IBEW | 2909 Anthony Ln St Anthony Village, MN 55418-3238 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |
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| Patrick | Zomer | Pat.Zomer@lawmoss.com | Moss & Barnett PA | 150 S 5th St #1200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_24-63_AA-24-63 |