414 Nicollet Mall
Minneapolis, MN 55401

April 28, 2015

—Via Electronic Filing—

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

RE: SUPPLEMENTAL COMMENTS AND NOTICE TO ADMINISTER PROGRAM CONSISTENT WITH CSG STATUTE
COMMUNITY SOLAR GARDENS PROGRAM
DOCKET NO. E002/M-13-867

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the attached Supplemental Comments in the above-noted docket.

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 Holly Hinman at holly.r.hinman@xcelenergy.com or 612-330-5941 if you have any questions regarding this filing.

Sincerely,

/s/

AAKASH CHANDARANA
REGIONAL VICE PRESIDENT
RATES AND REGULATORY AFFAIRS

Enclosures
c: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF ITS PROPOSED COMMUNITY SOLAR GARDENS PROGRAM	DOCKET NO. E002/M-13-867 **SUPPLEMENTAL COMMENTS AND NOTICE TO ADMINISTER PROGRAM CONSISTENT WITH THE CSG STATUTE**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Supplemental Comments and Notice of Program Administration to the Minnesota Public Utilities Commission as a follow-up to our letter dated March 13, 2015. Our comments provide an update on the outcome of our recent discussions with stakeholders in the Solar*Rewards Community (S*RC) Implementation Workgroup. We also outline and explain our next steps for administering this program, which includes only allowing community-scale sized projects to move forward. We believe now is the right time to take this step as it will ensure that our customers will be protected from paying more for utility-scale solar resources than is needed while allowing a significant number of community solar garden projects to continue moving ahead, consistent with the language and intent of the community solar garden legislation.

At the outset, the Company reiterates its support for solar as a resource to be added to and used in its portfolio. In fact, as part of our recently filed integrated resource plan, we propose to add over 2,000 MW of solar in the next 15 years, a third of which is distributed. We are proposing such a significant addition, in part, to be responsive to our customers. We appreciate that some our customers may have an interest in solar but not the physical space or the financial resources to invest in this resource. For that reason, we support community solar gardens as a piece of the solution of bringing more solar onto our system and providing customers an option to participate in a solar program. We viewed this as a gradual transition, and we believe the

Legislature also believed it had created a gradual and deliberate transition. If all current gardens in the queue were developed, the Company would add nearly all of its planned distributed solar resources, not over 15 years, but in a single year.

As we have explained in our prior comments, the types of projects being proposed by developers for the Solar* Rewards Community program have been concerning to us since the very first applications were received. Developers are proposing projects that look and act like utility-scale solar projects, and at the same time the participant credit has been set at a value intended to facilitate the financing of much smaller community-based projects. Smaller projects lack economies of scale and as such are more costly to finance. This mismatch in size and price is problematic to us because (1) the purpose of this program is to facilitate community-sized solar projects (which are 1 MW in size or smaller) and (2) all of our customers will pay more if utility-scale solar projects continue to move through the Solar* Rewards Community Program. Based on the current volume of applications, the proposed community solar resource is equivalent to a large generating unit. Typically when we add a resource of this size to our system, we engage in a robust regulatory process, and we undertake competitive bidding. The result is that we select the best bid and customers receive the most cost-effective resource.

We appreciate the March 10 letter stating the Commission would take up our concerns in late spring or summer.[1] We believed a good use of our time until then was to convene the Implementation Workgroup in a series of meetings intended to challenge participants to come together around constructive solutions. The Company thought that the Workgroup would provide an opportunity for frank dialogue and momentum toward workable solutions to the issues the Company and parties have raised. Our goal was to present consensus-based solutions to the Commission. At the conclusion of these meetings, held on March 24, April 1, April 9, and April 15, 2015, the Workgroup was unable to reach consensus on the most significant issues, though progress was made on the minor issues.

We believe this exercise was worthwhile. We learned that the primary barrier to reaching consensus-based solutions is that the developers we engage with in the Implementation Workgroup have fundamentally divergent perspectives on nearly all

[1] The Commission can only speak through its written orders. ("… the commission does not speak through deliberations of the commissioners; it speaks only through written orders. *See* Minn.Stat. § 216B.33 (2008) (stating that all orders of the commission must be in writing).") *In the Matter of a Petition by for Approval of a Power Purchase Agreement Under Minn. Stat. 216B.1694, Determination of Least Cost Technology, and Establishment of a Clean Energy Technology Minimum Under Minn. Stat. 216B.1693*, 782 N.W.2d 282, 296 (Minn. Ct. App. 2010). We note, however, that the March 10, 2015 letter signed by the Executive Secretary is not an Order. If it were, it would violate the open meeting law.

issues – from the simple to the complex. We attempted to overcome this barrier first, by enabling more comprehensive discussions and adding an additional meeting beyond the initial schedule, and second, by engaging a professional third party facilitator. Even with the benefit of a facilitator, consensus could not be achieved on the most significant issues.

Today, parties are at an impasse. Our program has nearly 560 MWs of proposals in the application queue and the number is growing daily. Additionally, we are hearing from our customers, who have been approached by community solar garden developers. Based on these conversations, we see that our customers do not understand that they may not be able to use this program to meet their sustainability goals.

Customers are looking for clarity regarding this program. Because the intent and plain language of the statute are clear, we are providing notice that we will administer the program consistent with the statute and Commission Orders. Specifically, within 31 days of this filing, all projects which have proposed co-located gardens with an aggregate capacity greater than 1 MW will be scaled to 1 MW. We will provide developers with refunds for the program application, deposits, and interconnection fees they have paid to the Company to advance projects greater than 1 MW. New or existing applications which propose projects that individually or in aggregate exceed 1 MW will not advance. Projects that are compliant with the law and other program rules and do not have an individual or aggregate capacity greater than 1 MW will continue to advance through the application review process.[2]

Administering the program in this way is consistent with the law as the statute establishes a 1 MW garden size standard. The Commission's Orders do not address garden co-location resulting in project sizes which exceed 1 MW. We also believe administering the program in this way is important to ensure our participating customers have a positive experience and that they are joining the type of program that they set out to join.

Accordingly, the Company is administering the program to give effect to the size standard set forth in statute. The actions we are taking are required in order to allow compliant projects to advance without delay. The end result is that we will soon have 70 to 80 MWs of community solar in service, and Minnesota will boast one of the largest community solar programs in the nation.

[2] Developers were apparently well aware that the Commission price plus the REC value would enable them to offer a discounted product from current and future rates. Developers did not make this clear to the Commission. Nor did developers that argued for this higher rate notify the Commission that when it debated the "close proximity" language that they intended to aggregrate anywhere from 10 MW to 80 MW.

In these Supplemental Comments we provide:

- a brief overview of the discussions that took place in the S*RC Implementation Workgroup's recent meetings,
- a discussion of program administration actions the Company is taking with respect to the aggregation of gardens at a single site resulting in projects that circumvent the statutory standard of 1 MW,
- a summary of the legislative history and policy rationale that supports this approach, and
- a brief discussion of a FERC pricing issue.

I. Implementation Workgroup Discussions

The first meeting began with a discussion of the goals and objectives of the next three meetings, followed by a lengthy discussion regarding interconnection practices including the Midcontinent Independent System Operator (MISO) review process, availability of data on queue position, with shorter time spent on feeder capacity data and potential "pre-screen" ideas. The Workgroup also discussed the deposit requirement, unsubscribed energy RECs, and REC treatment for participants of the solar incentive programs. We report the progress of these discussions to the Commission, organized by topic.

A. Goals and Objectives of Meeting Series

The Workgroup discussed goals for the upcoming meetings, including finding agreement where possible on disputed issues and limiting issues to bring to the Commission. Several parties noted that contentious items could not be addressed in the Workgroup and that an outside facilitator would be useful for discussions regarding project size. The Company retained a facilitator, former PUC Commissioner Phyllis A. Reha of PAR Energy Consulting, for the third and fourth meetings.

B. Garden Size

The most critical of the issues addressed in the Workgroup is the issue of garden size. The group discussed the concerns the Company has raised about garden size-price mismatch and the Company's understanding of the statutory intent to produce community solar gardens built to a meaningful 1 MW standard.

The group was able to exchange some frank thoughts about the sizes of projects proposed, the meaning of the law, and about the implications of the growing application queue. The developers expressed diverse opinions on each of these questions. The group did not achieve any recommendations that could be brought to the Commission to resolve this impasse.

C. MISO Process

With respect to the MISO process, the group discussed review and notification steps that would identify how projects proceed once a transmission impact is identified. The group discussed this topic for three consecutive meetings. The group considered the following proposal from the Company: at the time Xcel Energy distribution engineers recognize that the proposed interconnection may affect the transmission system, the Company will engage an Xcel Energy transmission engineer to review the proposal and contact MISO. The applicant will be notified and can choose to either or continue moving forward through the Section 10 distribution process, or wait until MISO makes a determination regarding whether a more detailed study or upgrades are required to accommodate the additional distributed generation. The group was unable to resolve this technical issue in the context of the full Workgroup and referred it to a subgroup. The subgroup will work on MISO process questions offline and will return to the Workgroup with recommendations. We expect to refine these process and notification steps further once the Company and applicants gain more experience.

D. Distributed Generation (DG) Queue Transparency

Xcel Energy opened the discussion on queue transparency by offering to provide a new solution. The Company was prepared to make available information regarding the projects in the queue prior to issuing a Statement of Work (SOW). There was consensus among nearly all solar developers participating in the Workgroup that this would provide a benefit, with the exception of one developer. Geronimo Energy supported an "all or none" solution, meaning it would accept nothing short of disclosure of every pending project at every substation. There was discussion on the appropriateness of providing data on queue position relative to existing applications, disclosures on interconnection requests outside of the program, and on whether to make queue position information available publicly to all or to individual requestors. The March 24th meeting concluded without resolution on this issue.

On April 1, the Workgroup picked up its discussion on queue transparency. The Company again brought forward a new solution and there was general support for a Solar*Rewards Community-only public queue. This solution refers to disclosures on

pending applications for community solar at specific locations, and not for other interconnection requests outside of the program. There was discussion, though not consensus, regarding the timing and type of certain disclosures. The group resolved to move forward with a set of next steps: post the Solar*Rewards Community application identification number, County, substation, size, and deemed complete date to the website. The group also committed to continuing to explore making public the status of each project at later stages and to continue to explore this issue.

E. Pre-Screen

In response to developer requests, the Company proposed to make a pre-screen option available to applicants and potential applicants. Workgroup members expressed general support for a pre-screen option, even with a public Solar*Rewards Community project queue. The Company committed to an action item to compare possible pre-screen models (including fee structure) to both the option available in our Colorado jurisdiction and a similar mechanism required by the Federal Energy Regulatory Commission (FERC)[3] and in use by transmission operators.

F. Secure Cancellation and Return of Deposit

The Company expressed that it continues to strongly oppose the imposition of a duty on the Company to facilitate the assignment of applicants' deposits to third parties because, from the Company's perspective, to do so would undermine the purpose of the refundable deposit and create undue risk in managing and tracking assignment requests. Despite its opposition, the Company did note its openness to creating a more secure cancellation process within the application system where the applicant can cancel its project from within the system, rather than requesting that Xcel Energy cancel its project.

The Workgroup discussed this proposal, which received support from some members. Others believed the solution did little to alleviate concerns about the deposit process. Developers expressed a desire for their employees and agents to have differentiated access accounts to our system with distinct permissions (such as settings for subscriber, primary application manager, cancellation permissions, etc.)

The Workgroup shared desires for other potential enhancements to the management of deposits, including a more formal deposit form and receipt of payment, the

[3] 145 FERC ¶ 61,159 ; UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION; 18 CFR Part 35 [RM13-2-000; Order No. 792] Small Generator Interconnection Agreements and Procedures; Issued November 22, 2013.

provision of regular statements, and the establishment of a separate account with a title company. The Workgroup resolved that the developers would perform research and return to the group with information on how a title company account would work. Developers would also return with proposed changes to the deposit form, and specific requests on the desired permission settings and access account types in the online system.

G. RECs for Unsubscribed Energy

The Company signaled that it could support paying a REC price for unsubscribed energy, and suggested that since the current REC price is non-precedential and to encourage maximum subscription levels, the unsubscribed REC price need not and should not be equal to the subscribed energy REC price. Workgroup members agreed with the rationale that full subscription levels should be encouraged. Developers suggested a range of unsubscribed REC values, including 0.5¢ – 1.5¢ per kWh. There was also some discussion of thresholds for subscription levels, or periods of time that a portion of capacity/energy production was unsubscribed and would therefore qualify at the unsubscribed level. Some Workgroup members acknowledged that a market-based REC price was closer to 0.01¢/kWh. Others were adamant that the same REC payment made for subscribed energy should be paid for unsubscribed energy. It was noted that paying more for unsubscribed RECs exacerbates the customer rate impacts from this program. The Workgroup resolved that the Company would return with a proposal.

At the April 9 meeting, the Company proposed a 1.0¢/kWh REC payment for unsubscribed energy in order to resolve this issue. The Company acknowledged that this is well above market pricing, but less than the current Commission-approved REC rate for subscribed energy and represents a reasonable compromise. The group discussed the Company's offer at both the April 9th and April 15th meetings but could not reach consensus. The Company has withdrawn its offer.

H. REC Treatment for Made in Minnesota and Solar*Rewards Gardens in Years 11 through 25

The group discussed possible resolutions to the question of what REC treatment will be available for Solar*Rewards Community projects which also receive Made in Minnesota or Solar*Rewards which transfer RECs to the Company and receive incentives for the first ten years of the project. The Workgroup determined that this issue would not be resolved in the Workgroup and should be referred to a subgroup including smaller-scale developers and installers building these gardens. The

Department, MnSEIA, and the Company will work to develop a subgroup recommendation.

II. Next Steps

The Workgroup resolved a couple of administrative items that the Company will implement immediately. In addition, members of the Implementation Workgroup took action items to be addressed going forward on issues related to the MISO process and the handling of deposits. Meeting minutes will be filed in this docket once approved by the Workgroup, and will provide further detail on specific actions.

Despite this progress, it is clear that the most important issues facing the Workgroup, including eligible garden size, remain beyond the scope of what can be effectively addressed by the Implementation Workgroup. Because we did not resolve the important issue of eligible garden size in the Workgroup, the Company will implement our program consistent with the Community Solar Garden (CSG) statute and related Commission Orders.

The program must be implemented in accordance with the express terms and intent of the authorizing legislation and the legislation's history. Accordingly, we will administer our program as such. In particular:

- Within 31 days of this filing, all existing or new applications which propose co-located gardens with an aggregate capacity greater than 1 MW will be scaled to 1 MW.
- We will process applications for co-located gardens provided that, in the aggregate, they do not exceed 1 MW.
- We will also process applications from multiple individual (unaffiliated) developers who propose co-located sites provided the gardens from any single developer do not exceed 1 MW in the aggregate.[4]
- We will not process applications for projects in excess of 1 MW where it is simply dividing up a utility-scale project into multiple smaller gardens.

To implement this approach, the Company will notify applicants to the S*RC program (whether new or existing) whose projects do not comply with the 1 MW limit. In practice, this will usually mean that the first eligible MW of co-located sites

[4] If multiple developers arrange a host of garden swaps to aggregate a series of sites to establish utility scale solar efficiencies, we will treat the developers as affiliates or partners. In short, we will reject developer efforts to arbitrage the statute.

will be allowed to advance. S*RC program applications for the second, third (and so forth) MWs will trigger a rejection and cancellation notification. This notification will consist of an email identifying the S*RC application numbers which will be cancelled for non-compliance. The Company will then issue a full refund of the applicant's deposit, application fee, and engineering fees paid to the Company to date for the applications which in aggregate exceed the 1 MW standard.

We want to be our customers' trusted energy provider, and we want to facilitate access to renewable generation choices for our customers. We understand that some of our customers want a product offering to put some of their load on renewable resources. As the Commission noted, the community solar gardens program was intended as an alternative to a rooftop program to address those customers who wanted to participate in the production of solar but do not have the rooftop space.

To address the customer demand for putting load on renewable resources, we intend to work with stakeholders and develop a new product that provides additional renewable generation choices for customers who value long-term price certainty and the achievement of their sustainability goals.

III. Legislative and Regulatory History and Policy Analysis

Based on the terms of the statute and legislative history, there is no place for utility-scale projects in a community solar program. The program was intended to provide access to solar energy by "renters and property owners lacking sufficient capital to install their own solar systems or whose property may be shaded or otherwise unsuitable for a solar installation."[5]

The community solar garden statute expressly provides, in plain language and without exception, that a solar garden "must have a nameplate capacity of no more than one megawatt."[6] There is abundant evidence that the Legislature did not intend to promote large utility-scale solar projects but rather intended the 1 MW limit to serve as a real and enforceable constraint on the types and sizes of projects that received

[5] House Research, 2013 Solar Energy Legislation (August 2013) (available at http://www.house.leg.state.mn.us/hrd/pubs/ss/sssolarleg.pdf). On its website, the Department of Commerce describes the community solar garden program in similar terms: "The [community solar garden] program is designed for customers who cannot take advantage of other solar programs, because they rent, live in multifamily dwellings, their homes or businesses are not suitable for solar installations, or rooftop solar installations aren't right for them for other reasons. Participants can subscribe to as little as 200 watts of solar or enough to cover 120 percent of their annual electricity usage." *See* http://mn.gov/commerce/energy/media/Newsletters/Renewable-Energy/2014-Renewable-Energy-News/12_December_2014/xcel-energy-launches-community-solar-garden-program.jsp.

[6] Minn. Stat. § 216B.1641(b).

favorable rate treatment afforded to community solar gardens. This has been set forth in the Company's filings in this matter, including those of October 7, 2014, January 13, 2015, February 10, 2015, and March 4, 2015.

We note that none of the Commission's prior orders in this proceeding have addressed the issue of the permissible size of co-located community solar gardens. The Commission's April 7, 2014 Order noted "The solar-garden statute limits a garden's nameplate capacity to 1 MW or less"[7] and expressly required Xcel Energy to amend the solar-garden tariff to define the maximum solar-garden capacity as no more than 1 MW AC.

After receiving additional comments, the Commission held a hearing on August 7, 2014. In its September 17, 2014 Order the Commission restated the 1 MW capacity limit and expanded the definition of "community solar garden site" to expressly allow garden sites located in close proximity to one another to share in distribution infrastructure. The Commission did not address the application of the 1 MW statutory capacity limit to the situation of co-located gardens.

The Commission has not issued any order authorizing multiple 1 MW community solar gardens to be co-located, nor do we believe it could do so without directly violating the plain language of the CSG statute.

Notably, the Commission has addressed the broader policy and statutory purpose behind the sizing of eligible gardens. We believe that the program administration actions described here are consistent with and give effect to all of the Commission's Orders, including its February 13, 2015 Order. There, the Commission stated:

> The Commission also declines to adopt any definition of "customer" that would contravene the clear statutory intent to encourage broad community participation in solar gardens. The Commission is sympathetic to the predicament of larger customers, such as school districts, who wish to offset their entire electricity usage but are prevented from doing so by the 40% rule. However, fully offsetting energy use is not the primary purpose of a solar-garden program. If it were, the statute would not cap solar-garden size, set a minimum number of subscribers per garden, or limit a subscriber's share of garden output to

[7] *In the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of Its Proposed Community Solar Gardens Program*, Docket No. E-002/M-13-867, COMMISSION ORDER REJECTING XCEL'S SOLAR-GARDEN TARIFF FILING AND REQUIRING THE COMPANY TO FILE A REVISED SOLAR-GARDEN PLAN at 10 (April 7, 2014) ("April 7 Order").

> 40%. These restrictions appear instead to serve the statutory purpose of ensuring that solar gardens are accessible to a broad cross-section of the community.[8]

Based on our understanding of development efforts, the key target market for CSG developers today are large and medium sized Commercial and Industrial loads, rather than residential customers and churches, etc., that could not feasibly access rooftop solar.

As the Commission's Orders are silent on addressing the application of the 1 MW limit onto co-located gardens but do address the statutory purpose of the 1 MW sizing provision, the Company's program implementation actions are consistent with the CSG statute and the Commission's Orders.

IV. FERC Pricing Issue

In our February 10, 2015 Comments we raised concerns that aspects of the CSG program may conflict with FERC rules. Since that time, we have gone back to review FERC-related concerns. We believe that two aspects of the program could violate FERC rules. The first, which we discussed in our February 10 Comments, is the mandate to buy energy from an aggregated CSG of 20 MWs or greater. The second is whether the average retail rate plus a REC value exceeds avoided costs.

Both of these FERC issues do not apply to CSGs consistent with the legislative intent. However, we believe it is important the Commission understand some of these potential federal law conflicts as it considers expected comments from developers regarding our noticed administration of the program.

CONCLUSION

Xcel Energy is committed to promoting solar generation in Minnesota. As discussed in this filing, the Company is also committed to ensuring CSG program rules are applied consistently with the terms and intent of the CSG statute and Commission Orders. The Company will begin implementing the CSG program so that only those applications that are in compliance with the 1 MW statutory limit proceed through the application process.

Based on the eligible applications received to date, we expect we will have one of the largest solar gardens program in the country while avoiding the serious unintended consequences of using the program as a gateway for utility scale projects. We also

[8] *See*, Docket No. E-002/M-13-867, ORDER DENYING REQUEST FOR CLARIFICATION AND SETTING PUBLIC INFORMATION REQUIREMENTS, at page 4 (February 13, 2015).

look forward to providing an additional opportunity for customers through a new renewable energy choice.

Dated: April 28, 2015

Northern States Power Company

CERTIFICATE OF SERVICE

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

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

xx electronic filing

Docket No. E002/M-13-867

Dated this 28th day of April 2015

/s/

_____

Tiffany Hughes
Records Analyst

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Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Dean	Leischow	N/A	Sunrise Energy Ventures	601 Carlson Parkway, Suite 1050 Minneapolis, MN 55305	Paper Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Rebecca	Lundberg	rebecca.lundberg@powerfullygreen.com	Powerfully Green	11451 Oregon Ave N Champlin, MN 55316	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Casey	MacCallum	casey@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Erica	McConnell	emcconnell@kfwlaw.com	Keyes, Fox & Wiedman LLP	436 14th Street, Suite 1305 Oakland, California 94612	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

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Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Martin	Morud	mmorud@trunorthsolar.com	Tru North Solar	5115 45th Ave S Minneapolis, MN 55417	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticelllo, Minnesota 55362	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	7301 Ohms Ln Ste 325 Edina, MN 55439	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Donna	Pickard	dpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Dan	Rogers	drogers@sunedison.com	SunEdison	N/A	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129 St. Paul, MN 55116	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
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Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jason	Willett	jason.willett@metc.state.mn.us	Metropolitan Council	390 Robert St N Saint Paul, MN 55101-1805	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
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