



414 Nicollet Mall
Minneapolis, MN 55401

November 6, 2017

—Via Electronic Filing—

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

RE: REPLY COMMENTS
AFFILIATED INTEREST REQUEST
DOCKET NO. E002/AI-17-577

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments in response to the comments received from the Department of Commerce, Division of Energy Resources and the Office of the Attorney General – Residential Utilities and Antitrust Division.

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 me at amy.a.liberkowski@xcelenergy.com or (612) 330-6613 if you have any questions regarding this filing.

Sincerely,

/s/

AMY A. LIBERKOWSKI
DIRECTOR, REGULATORY PRICING AND ANALYSIS

Enclosure
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF NORTHERN STATES
POWER COMPANY'S AFFILIATED
INTEREST REQUEST AND
INFORMATIONAL FILING

DOCKET NO. E002/AI-17-577

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this Reply to the October 24, 2017 Comments of the Department of Commerce, Division of Energy Resources(the Department) and the October 25, 2017 Comments of the Office of the Attorney General – Residential Utilities and Antitrust Division (OAG).

In this Reply, we respond to the Department of Commerce, who recommended approval with modifications. The Company also responds to the OAG's comments.

REPLY

I. THE DEPARTMENT RECOMMENDS APPROVAL

The Department recommends approval of the use of the Interconnection Agreement and Standard Contract for the Solar*Rewards Community program (the SRC Program) projects set to be purchased by Company affiliate Nicollet Projects I LLC (Nicollet Projects) from New Energy Equity, LLC (NEE). The Department also recommends approval, with modifications, of the Administrative Service Agreement (ASA) between Xcel Energy Services Inc. (XES) and Nicollet Projects.

We appreciate the Department's thorough review of our proposal. After reviewing our initial Petition and issuing discovery, the Department concluded that our proposal complied with the requirements under Minnesota law, and that the contracts were reasonable and in the public interest. It also concluded that the Company's protections to ensure non-discriminatory treatment were reasonable and supported.

In regards to the Department's recommendation to include information in our annual compliance filings, we will provide all the documentation requested in our annual compliance filings. This includes documentation that all cost allocations are consistent with past Commission Order and also a comparison of the actual amounts allocated to Nicollet Projects to the estimated costs provided in our response to Department Information Request No. 3.

With respect to cost allocation, the ASA and the Company's financial accounting will proceed as described in our response to Department Information Request No. 3.

However, for ratemaking purposes, the Company applies a regulatory adjustment consistent with the Commission's March 25, 2011 Erratum Notice Order, in the Cost Allocation Procedures and General Allocator docket, Ordering Paragraph 1, which the DOC referenced in its comments. The Order states:

The Company shall change the formula for the general allocator and for all allocators in which it uses number of employees to substitute Allocated Labor Hours with Overtime in place of Number of Employees.

This regulatory adjustment implements the compliance sought by the Department for the State of Minnesota without disrupting the accounting methods and agreements that govern cost flows across Xcel Energy and its other jurisdictions. The Company applied this adjustment in each of its last three Minnesota rate cases in order to comply with the Commission's order:

- Docket No. E002/GR-12-961, Heuer Direct, page 81.
- Docket No. E002/GR-13-868, Heuer Direct, page 137-138.
- Docket No. E002/GR-15-826, Heuer Direct, page 90-91.

Because of this regulatory adjustment in rate cases, the Company believes alterations to the ASA specific to the State of Minnesota are unneeded.

II. OAG COMMENTS

The OAG recommends rejection of our Petition because they believe it is not within the public interest, that it will provide the Company with a competitive advantage, and would create new financial incentives for the Company within the Community Solar Garden (CSG) program. The Company disagrees with the OAG's reasoning, as there are program safeguards in place to ensure a fair process.

The arguments related to process fairness raised by the OAG in their Comments were addressed by the Company in our responses to Department Information Requests. The Department asked several questions to gather further information about the Nicollet Projects proposal. We responded to the Department's requests and provided them with more detail on the Nicollet Projects proposal, as highlighted below. After reviewing our responses, the Department recommended approval of our proposal.

The OAG also asserts the existence of a financial conflict of interest. We disagree with this assertion, as discussed here.

A. The Process is Sound and Ensures Fairness

As our Petition and responses to Department Information Requests make clear, Nicollet Projects is not handling the interconnection and siting process or the customer-facing, subscriber recruitment process. Both processes have safeguards in place to ensure that Nicollet Projects does not gain advantages over other participants due to its relationship to the Company. Further, because Nicollet Projects is an offtaker of completed projects, not a developer, the OAG's concerns are misplaced.

1. Interconnection Process Safeguards

The projects subject to the purchase agreement with Nicollet Projects have not received any preferential treatment in the siting and interconnection process. NEE began the development of these projects on their own accord and initiated the interconnection process before entering into an agreement with Nicollet Projects.

The Department inquired about assistance given by the Company to NEE during the development of these projects in their Information Request No. 4, asking:

Is the price for solar projects being purchased by Nicollet lower as a result of helping the developer (New Energy Equity LLC) with anything, including but not limited to solar gardens and interconnections? Please support your response.

The Company response to the question was:

No. Neither Xcel Energy nor Nicollet Projects has assisted NEE in the development of the projects. The siting and interconnection responsibilities are managed by NEE. The developer is incurring the same costs for interconnection and distribution system upgrades as any other developer would

for a project with the same attributes participating in the program. The interconnection and/or development costs are not affected by the fact that the projects eventually will be owned by an Xcel Energy affiliate. Accordingly, the purchase price was not lower given that we did not provide project development assistance to the developer.

The Department more generally inquired about safeguards that will ensure that all CSG projects will not receive treatment and information not available to other developers in their Information Request No. 4, asking:

Please explain all safeguards Xcel will use to ensure that it does not treat Nicollet [P]rojects in a preferential manner relative to other solar garden developers. Include information on how Nicollet [P]rojects will be identified to Xcel personnel, Nicollet's access to information on Xcel's distribution system, billing treatment, and how Xcel will ensure non-discriminatory treatment through the interconnection process.

Our response describes the safeguards that ensure these projects have not received preferential treatment in the Interconnection process. In response to their question we stated¹:

At the outset, it should be noted that the timeline of the negotiations demonstrate that Nicollet Projects did not receive any preferential treatment when it comes to the initial approval of these solar projects. The developer, NEE, has been following the SRC Program process in the same way as any other developer. All projects were submitted for approval before initial discussions between NEE and the Company or Nicollet Projects commenced in January 2017. Neither the Company nor Nicollet Projects had influence on the projects submitted by NEE into the SRC Program.

The SRC Program is governed by the Commission-approved tariffs. As owner of projects within the program, Nicollet Projects will be bound by those tariffs and will stand in the same position as all other Community Solar Garden Operators...

...Nicollet Projects has not had and will continue not to have access to non-public distribution grid information, customer data, or program data. The

¹ Response has been summarized. Our complete response to Department Information Request No. 4 was attached to the Department's Comments.

Nicollet Projects negotiating team submitted affidavits with the initial petition that attest to these facts.

All developers have had and will continue to have an equal opportunity to develop CSGs under the SRC Program, without regard to the participation of Nicollet Projects. Rather than discouraging other developers from entering the market due to an unfair advantage or receiving preferential treatment, as claimed by the OAG, Nicollet Projects' participation in the program benefits the SRC Program as a whole. As an offtaker of project portfolios, Nicollet Projects provides an attractive long-term ownership exit strategy for developers wishing to market portfolios of constructed projects.

2. *Customer Relationship Safeguards*

The Company is committed to making sure that any CSG projects owned by the Company, or Company-related affiliates, do not have an advantage when it comes to competing for customers. Neither the Company nor Nicollet Projects is handling the customer-facing aspects of the CSG directly. As we explained in our response to the Departments Information Request No. 4:

Further, Nicollet Projects will be outsourcing the subscriber-facing contact to NEE through a Customer Management Agreement. NEE has been independently marketing the subscription offer to its projects to potential subscribers without any information or any assistance from Nicollet Projects or Xcel Energy. Per the Customer Management Agreement with NEE, in the event a subscriber were to withdraw from the program, replacement of that subscriber will be handled by NEE—who has no greater access to the Company's customer records and market research than any other solar developer...

The model Nicollet Projects is using as an eventual garden owner assures that neither it nor the Company would benefit in any way from access to customer data or other potential "marketing" advantages, and thus the safeguards in place are more than sufficient to comply with the requirement to treat utility and non-utility program participants alike, even though this is not a utility project.

B. No financial conflict of interest exists

Given how the CSG program is structured, the Company has from the time of its initial community solar program proposal been focused on overall program costs and

customer impacts. The Company's position in the CSG proceeding has consistently focused on finding ways to deliver a successful program with a balanced cost impact for customers.

The OAG makes a wholly unsupported assertion that if a non-regulated affiliate participated as a garden owner, that this would somehow modify Company behavior with respect to its focus on developing a successful CSG program with balanced customer cost impacts. The OAG asserts that the Company will instead be inclined to advocate for maximum compensation in the program and abandon our interest in keeping electricity rates low. There is no foundation for such a claim and, in fact, there is direct evidence to the contrary.

For example, as recently as two weeks ago the Company joined the OAG in opposing the inclusion of incentives in the subscriber compensation model.² The Company's arguments in that matter focused on the lack of an evidentiary record to support an increase and the lack of analysis on customer impacts in the incentive proposal. This position, argued to the Commission well after the Affiliated Interest request was initiated, is entirely consistent with the Company's long-term advocacy on program cost impacts. There is no evidence of any conflict of interest that would preclude the approval of the Company's Affiliated Interest request.

C. OAG's recommendation harms low-income solar efforts

The OAG states, "neither Xcel nor sister companies within the Northern States Power Company system should be permitted to participate in the community solar garden market [...]"³ This sweeping prohibition would effectively preclude the Company from pursuing its joint access partnership to bring forward a community solar garden to serve low income customers at Railroad Island in Saint Paul, a project submitted in compliance with a direct Commission order.⁴

As the Commission is aware, this project is designed to expand access to community solar to low income customers. The Company will own the Railroad Island solar facility directly, rather than through non-regulated affiliates. The Company has, in that matter, similarly set forth its compliance with both the statutory requirement to treat utility- and non-utility participants alike, as well as the Commission's requirement to provide a plan to safeguards against discriminatory treatment. Despite its

² Docket No. E002/M-13-867, MPUC hearing date October 24, 2017.

³ See October 25, 2017 Comments of the Office of Attorney General, page 1.

⁴ See Docket No. E002/M-17-527.

recommendation for a sweeping prohibition of Company participation, the OAG has voiced no opposition to the Company's proposal for participation in that context.

We agree that there should be no objection to the Company's proposal because it is not only fully compliant, but is among the most comprehensive efforts to bring CSG access directly to low-income customers in our service territory and provides an innovative model to generate learnings. If the Company were subject to the OAG's broad prohibition, we believe it would harm future efforts to expand CSG access to low-income customers.

CONCLUSION

We appreciate the opportunity to provide this Reply, and we appreciate the Department's recommendation that the Commission should approve our Affiliated Interest request. The Company will utilize a regulatory adjustment to make sure that the indirect cost allocation procedures comply with Commission Order.

The OAG's objection did not raise any concerns not already addressed and refuted in Information Request responses provided to the Department and their characterization that the Company would have financial conflicts of interests are unproven. Their overly broad objection is unsupported and may harm future CSG program developments, including the ability for the Company and its community partners to expand access to community solar for low-income customers.

Xcel Energy respectfully requests that the Commission approve the use of the Interconnection Agreement and Standard Contract for the CSG projects that are planned to be purchased by Nicollet projects and approve the ASA between XES and Nicollet Projects.

Dated: November 6, 2017

Northern States Power Company

CERTIFICATE OF SERVICE

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

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

xx electronic filing

Docket Nos. E002/AI-17-577

Dated this 6th day of November 2017

/s/

Carl Cronin
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-577_AI-17-577
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_17-577_AI-17-577
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_17-577_AI-17-577
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1774 Platte St Denver, CO 80202	Electronic Service	No	OFF_SL_17-577_AI-17-577
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_17-577_AI-17-577
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_17-577_AI-17-577
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_17-577_AI-17-577
Sara	Baldwin Auck	sarab@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156 Latham, NY 12110	Electronic Service	No	OFF_SL_17-577_AI-17-577
Ryan	Barlow	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_17-577_AI-17-577
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-577_AI-17-577

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-577_AI-17-577
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_17-577_AI-17-577
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_17-577_AI-17-577
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-577_AI-17-577
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-577_AI-17-577
Jeanne	Cochran	Jeanne.Cochran@state.mn.us	Office of Administrative Hearings	P.O. Box 64620 St. Paul, MN 55164-0620	Electronic Service	Yes	OFF_SL_17-577_AI-17-577
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_17-577_AI-17-577
Corey	Conover	corey.conover@minneapolismn.gov	Minneapolis City Attorney	350 S. Fifth Street City Hall, Room 210 Minneapolis, MN 554022453	Electronic Service	No	OFF_SL_17-577_AI-17-577
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-577_AI-17-577
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Solar	14333 Orchard Rd. Minnetonka, MN 55345	Electronic Service	No	OFF_SL_17-577_AI-17-577

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	Dammel	joseph.dammel@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_17-577_AI-17-577
Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures	3500 Bloomington Ave. S Minneapolis, MN 55407	Electronic Service	No	OFF_SL_17-577_AI-17-577
James	Denniston	james.r.denniston@xcelenery.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-577_AI-17-577
Ian	Dobson	Residential.Utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_17-577_AI-17-577
Jason	Edens	jason@rreal.org	Rural Renewable Energy Alliance	3963 8th Street SW Backus, MN 55435	Electronic Service	No	OFF_SL_17-577_AI-17-577
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_17-577_AI-17-577
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_17-577_AI-17-577
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_17-577_AI-17-577
Stephen	Fogel	Stephen.E.Fogel@XcelEnergy.com	Xcel Energy Services, Inc.	816 Congress Ave, Suite 1650 Austin, TX 78701	Electronic Service	No	OFF_SL_17-577_AI-17-577

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_17-577_AI-17-577
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_17-577_AI-17-577
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_17-577_AI-17-577
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_17-577_AI-17-577
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-577_AI-17-577
Sean	Gosiewski	sean@afors.org	Alliance for Sustainability	2801 21st Ave S Ste 100 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_17-577_AI-17-577
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_17-577_AI-17-577
Timothy	Gulden	info@winonarenewableenergy.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	OFF_SL_17-577_AI-17-577
Michael	Harvey	mike@weknowsolar.com	We Know Solar	265 Mounds View Rd Suite #1 River Falls, WI 54022	Electronic Service	No	OFF_SL_17-577_AI-17-577
Duane	Hebert	duane.hebert@novelenergy.biz	Novel Energy Solutions	1628 2nd Ave SE Rochester, MN 55904	Electronic Service	No	OFF_SL_17-577_AI-17-577

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-577_AI-17-577
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_17-577_AI-17-577
Jim	Horan	Jim@MREA.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_17-577_AI-17-577
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_17-577_AI-17-577
John S.	Jaffray	jjaffray@jrpowers.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_17-577_AI-17-577
Julia	Jazynka	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_17-577_AI-17-577
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_17-577_AI-17-577
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_17-577_AI-17-577
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-577_AI-17-577

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-577_AI-17-577
Julie	Jorgensen	Julie@greenmark.us.com	GreenMark Community Solar LLC	708 N. 1st St. #421 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-577_AI-17-577
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_17-577_AI-17-577
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_17-577_AI-17-577
John	Kearney	jmkearney@MnSEIA.org	MnSEIA	2512 33rd Ave S Minneapolis, MN 55406	Electronic Service	No	OFF_SL_17-577_AI-17-577
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_17-577_AI-17-577
Madeleine	Klein	mklein@socoreenergy.com	SoCore Energy	225 W Hubbard Street Suite 200 Chicago, IL 60654	Electronic Service	No	OFF_SL_17-577_AI-17-577
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_17-577_AI-17-577
Jon	Kramer	sundialjon@gmail.com	Sundial Solar	3209 W 76th St Edina, MN 55435	Electronic Service	No	OFF_SL_17-577_AI-17-577

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_17-577_AI-17-577
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-577_AI-17-577
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_17-577_AI-17-577
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_17-577_AI-17-577
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Wayzata, MN 55391	Electronic Service	No	OFF_SL_17-577_AI-17-577
Paula	Maccabee	Pmaccabee@justchangelaw.com	Just Change Law Offices	1961 Selby Ave Saint Paul, MN 55104	Electronic Service	No	OFF_SL_17-577_AI-17-577
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_17-577_AI-17-577
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_17-577_AI-17-577
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_17-577_AI-17-577
Erica	McConnell	mconnell@smwlaw.com	Shute, Mihaly & Weinberger LLP	396 Hayes St San Francisco, California 94102-4421	Electronic Service	No	OFF_SL_17-577_AI-17-577

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_17-577_AI-17-577
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_17-577_AI-17-577
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_17-577_AI-17-577
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-577_AI-17-577
Martin	Morud	mmorud@trunorthsolar.com	Tru North Solar	5115 45th Ave S Minneapolis, MN 55417	Electronic Service	No	OFF_SL_17-577_AI-17-577
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_17-577_AI-17-577
Rolf	Nordstrom	rnordstrom@gpsid.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_17-577_AI-17-577
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_17-577_AI-17-577
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_17-577_AI-17-577
Jeff	Oxley	jeff.oxley@state.mn.us	Office of Administrative Hearings	600 North Robert Street St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-577_AI-17-577

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Pasi	ericp@ips-solar.com	Innovative Power Systems Solar	2670 Patton Rd Roseville, MN 55113	Electronic Service	No	OFF_SL_17-577_AI-17-577
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_17-577_AI-17-577
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_17-577_AI-17-577
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_17-577_AI-17-577
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_17-577_AI-17-577
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_17-577_AI-17-577
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-577_AI-17-577
Inga	Schuchard	ischuchard@larkinhoffman.com	Larkin Hoffman	8300 Norman Center Drive Suite 1000 Minneapolis, MN 55437	Electronic Service	No	OFF_SL_17-577_AI-17-577
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_17-577_AI-17-577
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_17-577_AI-17-577

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Zeviel	Simpser	zsimpser@briggs.com	Briggs and Morgan PA	2200 IDS Center 80 South Eighth Street Minneapolis, MN 554022157	Electronic Service	No	OFF_SL_17-577_AI-17-577
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_17-577_AI-17-577
Byron E.	Starns	byron.starns@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-577_AI-17-577
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-577_AI-17-577
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-577_AI-17-577
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_17-577_AI-17-577
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_17-577_AI-17-577
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_17-577_AI-17-577
Jason	Willett	jason.willett@metc.state.mn.us	Metropolitan Council	390 Robert St N Saint Paul, MN 55101-1805	Electronic Service	No	OFF_SL_17-577_AI-17-577

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-577_AI-17-577
Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_17-577_AI-17-577
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_17-577_AI-17-577
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-577_AI-17-577