

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

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| Katie J. Sieben | Chair |
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| Hwikwon Ham | Commissioner |
| Joseph K. Sullivan | Commissioner |
| John A. Tuma | Commissioner |

In the Matter of Xcel Energy’s Tariff Revisions
Updating Community Solar Garden Tariff Providing
Additional Customer Protections in Subscription Eligibility

DOCKET NO. E-002/M-21-695

In the Matter of the Petition of Northern States
Power Company, d/b/a Xcel Energy, for Approval
of its Proposed Community Solar Garden Program

DOCKET NO. E-003/M-13-867

**Reply Comments of Mid-Minnesota Legal Aid and Legal Services Advocacy Project
Updated Background**

The undersigned welcome this opportunity to submit Reply Comments in these dockets. Mid-Minnesota Legal Aid and Legal Services Advocacy Project (hereinafter "Legal Aid") are grateful for the meticulous Comments of other parties, and informative communications as well, leading up to the conclusion of this Reply Comment time period. As with its initial Comment, Legal Aid's Reply Comment will focus on broader and more general housing concerns in connection with the Community Solar Garden (CSG) model. This Reply Comment will also briefly address changes to the "in care of" billing model proposed by Energy Cents Coalition (ECC).

Legal Aid's perspective is, as set forth previously, that the legal, and perhaps technological landscapes have evolved in the years that the CSG dockets have been open. These developments include increased eviction-related litigation that includes or turns on landlord or landlord-agent practices in the utility billing and shutoff areas, as well as technological advances in the advent of

future generation, distribution, and billing for solar energy via expansion of the existing regulated provider infrastructure. Presumably, the latter would incorporate traditional regulated provider billing and the attendant established consumer protection framework.

In the two weeks since initial Comments were filed, it was reinforced to the undersigned that "in care of" billing cannot be counted on to preserve a full LIHEAP benefit and tenant access to Crisis funds for a tenant who had been a direct customer of the regulated provider. These general points will be discussed below.

Discussion

1. Legal Aid has Continuing Concerns with the CSG Model that are Not Resolved by "In Care Of" Billing.

On March 19, 2024, in a second conversation with a different representative at the office of a local LIHEAP administrator, undersigned attorney Van Winkle was again informed that the "in care of" billing model cannot be counted on to preserve a full LIHEAP benefit or access to Crisis funds. The representative stated that the form of, or the name on the bill, would not necessarily guarantee tenant access to a full LIHEAP benefit or to Crisis funds. The representative said that the problem would be that the LIHEAP funds were ultimately going to the landlord or third-party biller and not to the utility provider. That official volunteered that she had tracking concerns even if a full LIHEAP benefit were awarded. Specifically, she asked, how would any service credit resulting from a full benefit be tracked and verified as having been applied to the tenant's service account(?). The point is, and it has been reinforced now by multiple LIHEAP agency representatives that, at least where critical LIHEAP and Crisis benefits are concerned, "in care of" billing does not place a tenant in the same position as a direct customer of the utility provider. It appears this problem would not exist but for the third-party billing and re-billing aspects of the CSG model.

Legal Aid agrees also with commenters who noted the burdensome and complex nature of this utility billing approach, which is not alleviated by the "in care of" billing method.¹ For example throughout its impressively detailed Comment, but particularly on pages 4-5, ECC notes and discusses seven different points at which misinformation or lack of information could negatively impact tenants. For example, at the top of page 4 of its Comment, ECC references problems with tracking and crediting of tenant PowerOn payments. On page 5 of its Comment, ECC notes the potential for tenants' not being aware of the "in care of" billing option. At the bottom of page 5 of its Comment, ECC refers to a LIHEAP tracking problem, that appears to echo the earlier LIHEAP representative's remarks.

Turning to ECC's suggested revisions, while Legal Aid does oppose approval of the Compliance Filing and of the CSG model – Legal Aid supports these proposed revisions, with an addition. Legal Aid would restore monthly mailing of paper utility provider bills to “in care of” billing tenants. Legal Aid does understand that it has been stated that restoring such billings is not feasible. The tenant's status in the “in care of” billing model as a continuing customer might be much clearer however, if tenants were simply mailed a monthly bill as before. This step would not undo the billing complexity in Legal Aid's view, but it might reinforce that the tenant remains a utility customer and make this billing model more easily understood by the end-user.

Because the "in care of" billing model does not place a LIHEAP recipient in the same position as a direct customer of the utility provider though, Legal Aid opposes this model and the Compliance Filing.

2. Third-Party Utility Billing and Re-Billing Converts Utility Billing Disputes into Threats of Eviction and Potential Loss of Housing.

¹The increased eviction risk created by utility re-billing and utility third-party billing will be discussed in the next section.

Until relatively recently, Legal Aid saw only a limited number of evictions or other housing problems involving utility billing, and then usually involving only apportioned billing pursuant to Minnesota Statutes Section 504B.215.² In the past decade, there has been an increase in Legal Aid housing intakes at the Minneapolis office involving sub-metering. There has been an increase also in intakes where a landlord has placed a direct-metered tenant account in the landlord's name. Both of these developments have increased the frequency with which Legal Aid sees evictions that turn on, or which include, issues stemming from landlord or third-party utility billing or re-billing.

As discussed in Legal Aid's initial Comment, higher-profile utility litigation – often involving landlord or third-party utility billing or re-billing – is on the rise in Minnesota. This litigation has included injunctive protection from eviction for tenants in numerous, multiple-family dwellings, obtained by the Office of the Minnesota Attorney General. Legal Aid believes it is critical for the Commission and the stakeholders to understand that the perhaps benign-appearing practice of transferring utility billing from a regulated provider to a landlord or landlord agent creates the potential for a threat to housing, where such a threat had not previously existed.

Considering the evolution of these solar energy dockets – there appears to be a particular and specific incentive for landlords and their agents to engage in utility billing and re-billing. As mentioned, landlord and third-party utility billing already exists in Minnesota to some degree – the CSG model is not inventing third party utility billing or re-billing. Respectfully, it does not follow however, that it is in the public interest of Minnesota utility end-users to approve a solar energy delivery and billing model that incorporates landlord or third-party utility billing and

² Both undersigned attorneys have decades of experience collectively and roughly equally -- in housing and utility litigation, as well as in legislative and regulatory matters.

re-billing to end-users. Based on the case intakes at Legal Aid, the problems created by such a model pose a particularly acute threat to the housing of low-income tenants.

Recently it has come to the attention of the undersigned that elsewhere in Minnesota, plans exist to provide access to utility-scale solar energy supplied by a regulated utility provider. Presumably, this would or could incorporate traditional modes of utility billing that would include widespread access to solar energy, and would maintain the consumer protection umbrella that exists via Minnesota Statutes, Minnesota Rules, and under the watchful eyes of this Commission. If economies of scale might make such a model feasible – or soon feasible – Legal Aid respectfully requests that such a model be considered instead of the CSG model.

Conclusion

For the reasons stated herein and including those contained in the initial Comment of Mid-Minnesota Legal Aid and Legal Services Advocacy Project, we respectfully ask that the Commission re-consider the question whether approving the proposed CSG solar energy model and the Compliance filing herein best serves the public interest of Minnesota utility end-users.

March 22, 2024

Respectfully submitted:

/s/ Gary Van Winkle
Staff Attorney, Atty. No. 170458
Mid-Minnesota Legal Aid
111 N. Fifth St., Suite 100
Minneapolis, MN 55403-1604
(612) 746-3601
gvanwinkle@mylegalaid.org

Additional signature on the following page

March 22, 2024

Respectfully submitted:

/s/ Ron Elwood

Supervising Attorney, Atty. No. 0349835

Legal Services Advocacy Project

Mid-Minnesota Legal Aid

970 Raymond Avenue, Suite G40

St. Paul, Minnesota 55114

(612) 636-2114

relwood@mylegalaid.org

CERTIFICATE OF SERVICE

I, Sabina Beck, hereby certify that on March 22, 2024 I served copies of the foregoing document upon the attached list of persons. I also certify that on March 8, 2024 I served copies of *Comments of Mid-Minnesota Legal Aid and Legal Services Advocacy Project Regarding Xcel Energy's Compliance Filing of January 16, 2024* that were filed on March 8, 2024, upon the attached list of persons.

X Electronic Filing

DOCKET No. **E-002/M-21-695**

DOCKET No. **E-002/M-13-867**

March 22, 2024

Respectfully submitted:

/s/Sabina Beck

Mid-Minnesota Legal Aid
111 N. Fifth St., Suite 100
Minneapolis, MN 55403-1604

March 22, 2024

Respectfully submitted:

/s/ Gary Van Winkle

Staff Attorney, Atty. No. 170458
Mid-Minnesota Legal Aid
111 N. Fifth St., Suite 100
Minneapolis, MN 55403-1604
(612) 746-3601
gvanwinkle@mylegalaid.org

| 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_21-695_21-695 |
| Michael | Allen | michael.allen@allenergysolar.com | All Energy Solar | 721 W 26th st Suite 211 Minneapolis, MN 55405 | Electronic Service | No | OFF_SL_21-695_21-695 |
| David | Amster Olzweski | david@mysunshare.com | SunShare, LLC | 1151 Bannock St Denver, CO 80204-8020 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Laura | Beaton | beaton@smwlaw.com | Shute, Mihaly & Weinberger LLP | 396 Hayes Street San Francisco, CA 94102 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Ingrid | Bjorklund | ingrid@bjorklundlaw.com | Bjorklund Law, PLLC | 855 Village Center Drive #256 North Oaks, MN 55127 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Kenneth | Bradley | kbradley1965@gmail.com | | 2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_21-695_21-695 |
| 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_21-695_21-695 |
| 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_21-695_21-695 |
| Kevin | Cray | kevin@communitysolaraccess.org | CCSA | 1644 Platte St Denver, CO 80202 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Timothy | DenHerder Thomas | timothy@cooperativeenergyfutures.com | Cooperative Energy Futures | 3500 Bloomington Ave. S Minneapolis, MN 55407 | Electronic Service | No | OFF_SL_21-695_21-695 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-----------------------------------|-------------------------------------|---|--------------------|-------------------|----------------------|
| James | Denniston | james.r.denniston@xcenergy.com | Xcel Energy Services, Inc. | 414 Nicollet Mall, 401-8 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Brian | Edstrom | briane@cubminnesota.org | Citizens Utility Board of Minnesota | 332 Minnesota St Ste W1360 Saint Paul, MN 55101 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Ron | Elwood | relwood@mnlsap.org | Legal Services Advocacy Project | 970 Raymond Avenue Suite G-40 Saint Paul, MN 55114 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Betsy | Engelking | betsy@nationalgridrenewables.com | National Grid Renewables | 8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437 | Electronic Service | No | OFF_SL_21-695_21-695 |
| 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_21-695_21-695 |
| 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_21-695_21-695 |
| Nathan | Franzen | nathan@nationalgridrenewables.com | Geronimo Energy, LLC | 8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Hal | Galvin | halgalvin@comcast.net | Provectus Energy Development llc | 1936 Kenwood Parkway Minneapolis, MN 55405 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Allen | Gleckner | gleckner@fresh-energy.org | Fresh Energy | 408 St. Peter Street Ste 350 Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_21-695_21-695 |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-------------------------------|--------------------------------------|--|--------------------|-------------------|----------------------|
| Jenny | Glumack | jenny@mrea.org | Minnesota Rural Electric Association | 11640 73rd Ave N Maple Grove, MN 55369 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Sean | Gosiewski | sean@afors.org | Alliance for Sustainability | 2801 21st Ave S Ste 100 Minneapolis, MN 55407 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Scott | Greenbert | scott@nautilusolar.com | Nautilus Solar Energy, LLC | 396 Springfield Aver, Ste 2 Summit, NJ 07901 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Kim | Havey | kim.havey@minneapolismn.gov | City of Minneapolis | 350 South 5th Street, Suite 315M Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Jan | Hubbard | jan.hubbard@comcast.net | | 7730 Mississippi Lane Brooklyn Park, MN 55444 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Reuben | Hunter | bhunter@madisonei.com | Madison Energy Investments | 8100 Boone Blvd Suite 430 Vienna, VA 22182 | Electronic Service | No | OFF_SL_21-695_21-695 |
| John S. | Jaffray | jjaffray@jrpower.com | JJR Power | 350 Highway 7 Suite 236 Excelsior, MN 55331 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Julie | Jorgensen | juliejorgensen62@gmail.com | Greenmark Solar | 4630 Quebec Ave N New Hope, MN 55428-4973 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Cliff | Kaehler | cliff.kaehler@novelenergy.biz | Novel Energy Solutions LLC | 4710 Blaylock Way Inver Grove Heights, MN 55076 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Ralph | Kaehler | Ralph.Kaehler@gmail.com | | 13700 Co. Rd. 9 Eyota, MN 55934 | Electronic Service | No | OFF_SL_21-695_21-695 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|---------------|----------------------------|-------------------------------------|---|--------------------|-------------------|----------------------|
| Michael | Kampmeyer | mkampmeyer@a-e-group.com | AEG Group, LLC | 260 Salem Church Road Sunfish Lake, MN 55118 | Electronic Service | No | OFF_SL_21-695_21-695 |
| William D | Kenworthy | will@votesolar.org | Vote Solar | 332 S Michigan Ave FL 9 Chicago, IL 60604 | Electronic Service | No | OFF_SL_21-695_21-695 |
| 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_21-695_21-695 |
| Aaron | Knoll | aknoll@greeneespel.com | Greene Espel PLLP | 222 South Ninth Street Suite 2200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Michael | Krause | michaelkrause61@yahoo.com | Kandiyo Consulting, LLC | 433 S 7th Street Suite 2025 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Dean | Leischow | dean@sunrisenrg.com | Sunrise Energy Ventures | 315 Manitoba Ave Ste 200 Wayzata, MN 55391 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Annie | Levenson Falk | annielf@cubminnesota.org | Citizens Utility Board of Minnesota | 332 Minnesota Street, Suite W1360 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Alice | Madden | alice@communitypowermn.org | Community Power | 2720 E 22nd St Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 E 7th St St Paul, MN 55106 | Electronic Service | No | OFF_SL_21-695_21-695 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|------------------------------|---|---|--------------------|-------------------|----------------------|
| Jason | Maur | jason.maur@renesolapower.com | Renesola Power Holdings, LLC | 850 Canal Street 3rd Floor Stamford, CT 06902 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Matthew | Melewski | matthew@nokomisenergy.com | Nokomis Energy LLC & Ole Solar LLC | 2639 Nicollet Ave Ste 200 Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Thomas | Melone | Thomas.Melone@AllcoUS.com | Minnesota Go Solar LLC | 222 South 9th Street Suite 1600 Minneapolis, MN 55120 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Marc | Miller | mmiller@soltage.com | Soltage, LLC | 66 York Street, 5th Floor Jersey City, NJ 07302 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Marcus | Mills | Marcus@communitypowermn.org | Community Power | 2720 E 22nd St Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Rolf | Nordstrom | rnordstrom@gpisd.net | Great Plains Institute | 2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Logan | O'Grady | logrady@mNSEIA.org | Minnesota Solar Energy Industries Association | 2288 University Ave W St. Paul, MN 55114 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Patty | O'Keefe | patty.okeefe@sierraclub.org | | 2525 Emerson Ave S Apt 2 Minneapolis, MN 55405 | Electronic Service | No | OFF_SL_21-695_21-695 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------------------|--------------------------------------|-------------------------------------|--|--------------------|-------------------|----------------------|
| 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_21-695_21-695 |
| Carol A. | Overland | overland@legalelectric.org | Legalelectric - Overland Law Office | 1110 West Avenue Red Wing, MN 55066 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Eric | Pasi | ericp@ips-solar.com | IPS Solar | 2670 Patton Rd Roseville, MN 55113 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Dan | Patry | dpatry@sunedison.com | SunEdison | 600 Clipper Drive Belmont, CA 94002 | Electronic Service | No | OFF_SL_21-695_21-695 |
| 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_21-695_21-695 |
| Kristel | Porter | kristel@mnrenewablenow.org | MN Renewable Now | N/A | Electronic Service | No | OFF_SL_21-695_21-695 |
| Paula | Prahl | paula.prahl@dominiuminc.com | Dominium | 2905 Northwest Blvd Ste 150 Plymouth, MN 55441 | Electronic Service | No | OFF_SL_21-695_21-695 |
| 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_21-695_21-695 |
| Isabel | Ricker | ricker@fresh-energy.org | Fresh Energy | 408 Saint Peter Street Suite 220 Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Jonathan | Roberts | jroberts@soltage.com | Soltage | 66 York St 5th Floor Jersey City, NJ 07302 | Electronic Service | No | OFF_SL_21-695_21-695 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|-----------|---|------------------------------------|---|--------------------|-------------------|----------------------|
| Delaney | Russell | delaney@mnipl.org | Just Solar Coalition | 4407 E Lake Street Minneapolis, MN 55407 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Christine | Schwartz | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | Yes | OFF_SL_21-695_21-695 |
| 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_21-695_21-695 |
| Christopher L. | Sherman | csherman@sherman-associates.com | Solar Holdings LLC | 233 Park Ave S Ste 201 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Doug | Shoemaker | dougs@charter.net | Minnesota Renewable Energy | 2928 5th Ave S Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_21-695_21-695 |
| 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_21-695_21-695 |
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Whitney | Terrill | whitney@mnipl.org | Minnesota Interfaith Power & Light | N/A | Electronic Service | No | OFF_SL_21-695_21-695 |
| Anna | Tobin | atobin@greeneespel.com | Greene Espel PLLP | 222 South Ninth Street Suite 2200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Zack | Townsend | zachary.townsend@brookfielddrenewable.com | Brookfield Renewable | 200 Liberty St FL 14 New York, NY 10281 | Electronic Service | No | OFF_SL_21-695_21-695 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|------------------------------|---|---|--------------------|-------------------|----------------------|
| Pat | Treseler | pat.jcplaw@comcast.net | Paulson Law Office LTD | 4445 W 77th Street Suite 224 Edina, MN 55435 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Gary | Van Winkle | gvanwinkle@mylegalaid.org | Mid-Minnesota Legal Aid | 111 N Fifth St Ste 100 Minneapolis, MN 55403 | Electronic Service | No | OFF_SL_21-695_21-695 |
| John | Vaughn | Nik@rreal.org | Rural Renewable Energy Alliance | 3963 8th Street SW Backus, MN 55435 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Kevin | Walker | KWalker@beaconinterfaith.org | Beacon Interfaith Housing Collaborative | N/A | Electronic Service | No | OFF_SL_21-695_21-695 |

| 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 |
| Andrew | Ball | aball@keyesfox.com | Keyes & Fox LLP | 1580 Lincoln Street Suite 880 Denver, CO 80203 | Electronic Service | No | OFF_SL_13-867_Official |
| Mike | Bauer | Mbauer@ci.rogers.mn.us | City of Rogers | 22350 South Diamond Lake Rd. Rogers, MN 55374 | Electronic Service | No | OFF_SL_13-867_Official |
| Laura | Beaton | beaton@smwlaw.com | Shute, Mihaly & Weinberger LLP | 396 Hayes Street San Francisco, CA 94102 | Electronic Service | No | OFF_SL_13-867_Official |
| Ingrid | Bjorklund | ingrid@bjorklundlaw.com | Bjorklund Law, PLLC | 855 Village Center Drive #256 North Oaks, MN 55127 | Electronic Service | No | OFF_SL_13-867_Official |
| Kenneth | Bradley | kbradley1965@gmail.com | | 2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_13-867_Official |
| Jessica | Burdette | jessica.burdette@state.mn.us | Department of Commerce | 85 7th Place East Suite 500 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_13-867_Official |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------|--------------------------------------|------------------------------------|--|--------------------|-------------------|------------------------|
| 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 |
| Kevin | Cray | kevin@communitysolaraccess.org | CCSA | 1644 Platte St Denver, CO 80202 | Electronic Service | No | OFF_SL_13-867_Official |
| George | Damian | gdamian@cleanenergyconomy.mn.org | Clean Energy Economy MN | 13713 Washburn Ave S Burnsville, MN 55337 | Electronic Service | No | OFF_SL_13-867_Official |
| Timothy | DenHerder Thomas | timothy@cooperativeenergyfutures.com | Cooperative Energy Futures | 3500 Bloomington Ave. S Minneapolis, MN 55407 | Electronic Service | No | OFF_SL_13-867_Official |
| 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 |
| Scott F | Dunbar | sdunbar@keyesfox.com | Keyes & Fox LLP | 1580 Lincoln St Ste 880 Denver, CO 80203 | Electronic Service | No | OFF_SL_13-867_Official |
| Hannah | Dunn | hannah.dunn@oakdalemn.gov | City of Oakdale | 1584 Hadley Ave N Oakdale, MN 55104 | Electronic Service | No | OFF_SL_13-867_Official |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-----------------------------------|--------------------------------------|---|--------------------|-------------------|------------------------|
| Brian | Edstrom | briane@cubminnesota.org | Citizens Utility Board of Minnesota | 332 Minnesota St Ste W1360 Saint Paul, MN 55101 | Electronic Service | No | OFF_SL_13-867_Official |
| Dick | Edwards | dedwards@ci.maple-grove.mn.us | City of Maple Grove | 12800 Arbor Lakes Parkway P O Box 1180 Maple Grove, MN 553116180 | Electronic Service | No | OFF_SL_13-867_Official |
| 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 |
| 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_13-867_Official |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | No | OFF_SL_13-867_Official |
| Nathan | Franzen | nathan@nationalgridrenewables.com | Geronimo Energy, LLC | 8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437 | Electronic Service | No | OFF_SL_13-867_Official |
| Hal | Galvin | halgalvin@comcast.net | Provectus Energy Development llc | 1936 Kenwood Parkway Minneapolis, MN 55405 | Electronic Service | No | OFF_SL_13-867_Official |
| Allen | Gleckner | gleckner@fresh-energy.org | Fresh Energy | 408 St. Peter Street Ste 350 Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_13-867_Official |
| Jenny | Glumack | jenny@mrea.org | Minnesota Rural Electric Association | 11640 73rd Ave N Maple Grove, MN 55369 | Electronic Service | No | OFF_SL_13-867_Official |

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| Sean | Gosiewski | sean@afors.org | Alliance for Sustainability | 2801 21st Ave S Ste 100 Minneapolis, MN 55407 | Electronic Service | No | OFF_SL_13-867_Official |
| Scott | Greenbert | scott@nautilusolar.com | Nautilus Solar Energy, LLC | 396 Springfield Aver, Ste 2 Summit, NJ 07901 | Electronic Service | No | OFF_SL_13-867_Official |
| Kim | Havey | kim.havey@minneapolismn.gov | City of Minneapolis | 350 South 5th Street, Suite 315M Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_13-867_Official |
| Jan | Hubbard | jan.hubbard@comcast.net | | 7730 Mississippi Lane Brooklyn Park, MN 55444 | Electronic Service | No | OFF_SL_13-867_Official |
| Reuben | Hunter | bhunter@madisonei.com | Madison Energy Investments | 8100 Boone Blvd Suite 430 Vienna, VA 22182 | Electronic Service | No | OFF_SL_13-867_Official |
| John S. | Jaffray | jjaffray@jrpowers.com | JJR Power | 350 Highway 7 Suite 236 Excelsior, MN 55331 | Electronic Service | No | OFF_SL_13-867_Official |
| Julie | Jorgensen | juliejorgensen62@gmail.com | Greenmark Solar | 4630 Quebec Ave N New Hope, MN 55428-4973 | Electronic Service | No | OFF_SL_13-867_Official |
| Cliff | Kaehler | cliff.kaehler@novelenergy.biz | Novel Energy Solutions LLC | 4710 Blaylock Way Inver Grove Heights, MN 55076 | Electronic Service | No | OFF_SL_13-867_Official |
| Ralph | Kaehler | Ralph.Kaehler@gmail.com | | 13700 Co. Rd. 9 Eyota, MN 55934 | Electronic Service | No | OFF_SL_13-867_Official |
| Michael | Kampmeyer | mkampmeyer@a-e-group.com | AEG Group, LLC | 260 Salem Church Road Sunfish Lake, MN 55118 | Electronic Service | No | OFF_SL_13-867_Official |

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|------------|---------------|--------------------------------|--|--|--------------------|-------------------|------------------------|
| William D | Kenworthy | will@votesolar.org | Vote Solar | 332 S Michigan Ave FL 9 Chicago, IL 60604 | Electronic Service | No | OFF_SL_13-867_Official |
| Samuel B. | Ketchum | sketchum@kennedy-graven.com | Kennedy & Graven, Chartered | 150 S 5th St Ste 700 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_13-867_Official |
| Bobby | King | bking@solarunitedneighbors.org | Solar United Neighbors | 3140 43rd Ave S Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_13-867_Official |
| Brad | Klein | bklein@elpc.org | Environmental Law & Policy Center | 35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601 | Electronic Service | No | OFF_SL_13-867_Official |
| 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 |
| Michael | Krause | michaelkrause61@yahoo.com | Kandiyo Consulting, LLC | 433 S 7th Street Suite 2025 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_13-867_Official |
| 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 | annielf@cubminnesota.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 |
| | | | | | | | |

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|------------|-----------|-----------------------------------|---------------------------------------|---|--------------------|-------------------|------------------------|
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 E 7th St St Paul, MN 55106 | Electronic Service | No | OFF_SL_13-867_Official |
| Gregg | Mast | gmast@cleanenergyecon mymn.org | Clean Energy Economy Minnesota | 4808 10th Avenue S Minneapolis, MN 55417 | Electronic Service | No | OFF_SL_13-867_Official |
| Jason | Maur | jason.maur@renesolapowe r.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 |
| Thomas | Melone | Thomas.Melone@AllcoUS. com | Minnesota Go Solar LLC | 222 South 9th Street Suite 1600 Minneapolis, MN 55120 | Electronic Service | No | OFF_SL_13-867_Official |
| Michael | Menzel | mike.m@sagiliti.com | Sagiliti | 23505 Smithtown Rd. Suite 280 Excelsior, MN 55331 | Electronic Service | No | OFF_SL_13-867_Official |
| Brian | Millberg | fwengineering@comcast.n et | | 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 |
| Marcus | Mills | Marcus@communitypower mn.org | Community Power | 2720 E 22nd St Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_13-867_Official |
| Andrew | Moratzka | andrew.moratzka@stoel.co m | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_13-867_Official |

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|------------|-----------|------------------------------------|---|---|--------------------|-------------------|------------------------|
| 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 |
| Carol A. | Overland | overland@legalectric.org | Legalelectric - Overland Law Office | 1110 West Avenue Red Wing, MN 55066 | Electronic Service | No | OFF_SL_13-867_Official |
| Eric | Pasi | eric@ips-solar.com | IPS Solar | 2670 Patton Rd Roseville, MN 55113 | Electronic Service | No | OFF_SL_13-867_Official |
| Dan | Patry | dpatry@sunedison.com | SunEdison | 600 Clipper Drive Belmont, CA 94002 | Electronic Service | No | OFF_SL_13-867_Official |
| | | | | | | | |

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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.stat e.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 |
| Micah | Revell | micah.revell@stinson.com | Stinson LLP | 50 South Sixth St Ste 2600 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_13-867_Official |
| 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 |
| Jonathan | Roberts | jroberts@soltage.com | Soltage | 66 York St 5th Floor Jersey City, NJ 07302 | Electronic Service | No | OFF_SL_13-867_Official |
| Delaney | Russell | delaney@mnipl.org | Just Solar Coalition | 4407 E Lake Street Minneapolis, MN 55407 | Electronic Service | No | OFF_SL_13-867_Official |
| Ian | SantosMeeker | ians@ips-solar.com | IPS Solar | N/A | Electronic Service | No | OFF_SL_13-867_Official |

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|----------------|------------|-----------------------------------|--------------------------------|--|--------------------|-------------------|------------------------|
| Joseph L | Sathe | jsathe@kennedy-graven.com | Kennedy & Graven, Chartered | 150 S 5th St Ste 700 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_13-867_Official |
| 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@hbc.com | Law Office of Karl W. Sonneman | 111 Riverfront Suite 202 Winona, MN 55987 | Electronic Service | No | OFF_SL_13-867_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_13-867_Official |
| Ally | Sutherland | asutherland@ighmn.gov | City of Inver Grove Heights | 8150 Barbara Avenue Inver Grove Heights, MN 55077 | Electronic Service | No | OFF_SL_13-867_Official |
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | 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@brookfi eldrenewable.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 |
| Gary | Van Winkle | gvanwinkle@mylegalaid.or g | Mid-Minnesota Legal Aid | 111 N Fifth St Ste 100 Minneapolis, MN 55403 | Electronic Service | No | OFF_SL_13-867_Official |
| John | Vaughn | Nik@rreal.org | Rural Renewable Energy Alliance | 3963 8th Street SW Backus, MN 55435 | Electronic Service | No | OFF_SL_13-867_Official |
| Robert J.V. | Vose | rvose@kennedy- graven.com | Kennedy & Graven, Chartered | 150 S 5th St Ste 700 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_13-867_Official |
| Kevin | Walker | KWalker@beaconinterfaith. org | Beacon Interfaith Housing Collaborative | N/A | Electronic Service | No | OFF_SL_13-867_Official |
| Jenna | Warmuth | jjwarmuth@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 55802-2093 | Electronic Service | No | OFF_SL_13-867_Official |
| Jessica | Welk | jjwelk@sherman- associates.com | Sherman Associates | 233 Park Avenue South Suite 201 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_13-867_Official |
| Heidi | Winter | hwinter@co.murray.mn.us | Murray County | 2500 28th Street PO Box 57 Slayton, MN 56172 | Electronic Service | No | OFF_SL_13-867_Official |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-------------------------|------------------------|--|--------------------|-------------------|------------------------|
| Curtis P | Zaun | curtis@cpzlaw.com | Attorney At Law | 3254 Rice Street Little Canada, MN 55126 | Electronic Service | No | OFF_SL_13-867_Official |
| Emily | Ziring | eziring@stlouispark.org | City of St. Louis Park | 5005 Minnetonka Blvd St. Louis Park, MN 55416 | Electronic Service | No | OFF_SL_13-867_Official |