



414 Nicollet Mall
Minneapolis, MN 55401

May 1, 2026

—Via Electronic Filing—

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: INITIAL COMMENTS
IN THE MATTER OF UPDATING THE GENERIC STANDARDS FOR THE
INTERCONNECTION AND OPERATION OF DISTRIBUTED GENERATION
FACILITIES ESTABLISHED UNDER MINN. STAT. §216B.1611
DOCKET NO. E999/CI-16-521

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits the attached Initial Comments in response to the Commission's April 10, 2026 Notice of Comment Period regarding the Distributed Generation Working Group Technical Subgroup's proposed changes to the Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements (TIIR) and Minnesota Distributed Energy Resources Interconnection Process (MN DIP) regarding Battery Energy Storage Systems and Limited/Non-Export Systems.

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 Kristen Ruud at 612-216-7979 or Kristen.S.Ruud@xcelenergy.com or contact me at 763-493-1811 or Brian.T.Monson@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/
BRIAN MONSON
DIRECTOR, DER INTEGRATION & SYSTEM PERFORMANCE

Enclosure
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF UPDATING THE
GENERIC STANDARDS FOR THE
INTERCONNECTION AND OPERATION OF
DISTRIBUTED GENERATION FACILITIES
ESTABLISHED UNDER MINN. STAT.
§216B.1611

DOCKET NO. E999/CI-16-521

INITIAL COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Initial Comments in response to the April 10, 2026 Notice of Comment Period.¹ As background, the Commission directed the Distributed Generation Working Group (DGWG) to explore the evaluation of battery energy storage systems under the Minnesota Distributed Energy Resources Interconnection Process (MN DIP), including whether distributed energy resource (DER) generation and battery storage should be studied together and how net-metered DER plus storage should be treated differently from non-exporting DER plus storage.

Between June and December 2025, Xcel Energy participated in a series of meetings of the DGWG Technical Subgroup (TSG) on Battery Energy Storage Systems and Limited/Non-Export Systems.

The subgroup deliberated and proposed changes to the Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements (TIIR) and the MN DIP. The Commission has asked for comments on the following topics:

- (1) Should the Commission adopt the TSG's proposed changes to the TIIR as found in Attachment B of this Notice?

¹ *In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established under Minn. Stat. §216B.1611*, Docket No. E999/CI-16-521, NOTICE OF COMMENT (April 10, 2026)

- (2) Should the Commission adopt the TSG's proposed changes to the ~~TIIR~~ MN DIP² as found in Attachment C to this Notice?
- (3) What action should the Commission take regarding the three disputed items in the TSG's report as found in Attachment A to this notice?
- (4) Should the Commission extend the temporary annual reporting on interconnection through at least 2030 by modifying the requirement in the August 13, 2018 Order (paragraph 20)? Or should the Commission make any changes to these reporting requirements?
- (5) Are there other issues or concerns related to this matter?

Xcel Energy acknowledges the quickly changing landscape of energy storage solutions and the benefits they can provide in creating an efficient and reliable grid. We support the adoption of DER, including energy storage systems, on our distribution grid. We are concerned, however, with the risks large DER systems that claim limited export capacity could pose if not reviewed, studied, and recorded appropriately. These resources must be studied and designed adequately to prevent adverse impacts on the distribution system.

The MN DIP was established to expedite studies and approval of DER systems within the size, scale, and complexity of 10 MW or less. For DER generation greater than 10 MW, even with power control systems designed to limit export of generation to the local area distribution system, the impacts of back feed to the local distribution system (Area Electric Power System, or EPS) can be severe. Xcel Energy requests the Commission reinforce the already existing uniform frameworks under MN DIP for studying the interconnection of small-scale DER systems, based on nameplate rating. This approach allows the utility facilitating the interconnection assurance that the level of complexity and risk involved with new interconnections is evaluated appropriately.

We request the Commission adopt the TSG's proposed changes to the TIIR; modify the TSG's proposed changes to the MN DIP regarding nameplate rating for a new interconnection screen or track for non-exporting DER applications; and adopt the Company's supported positions on the three disputed items in the TSG's report. Below we provide our responses and supporting detail.

² The Notice of Comment incorrectly listed "TIIR" when proposed changes to "MN DIP" was the intent of the question. See NOTICE OF COMMENT (April 10, 2026) p1.

COMMENTS

I. THE COMMISSION SHOULD ADOPT THE TSG'S PROPOSED CHANGES TO THE TIIR AS PRESENTED

We support the changes to the TIIR as they were indicated in Attachment B to the Notice. We note there was consensus within the TSG on these issues.

II. THE COMMISSION SHOULD ADOPT THE TSG'S PROPOSED CHANGES TO THE MN DIP AS PRESENTED, WITH ONE EXCEPTION

We support the changes to the MN DIP as indicated in Attachment C to the Notice,³ with one exception. The Commission's Order directed the DGWG to "explore the creation of a new interconnection screen or track for non-exporting DER applications under 40 kW AC."⁴ Attachment C to the Notice includes redlines that would apply to applications up to 50 kWac. The Company opposes this change. The subgroup did not reach consensus on whether the 40 kWac level should be amended to 50 kWac.

Attachment C includes proposed changes to MN DIP sections 1.1.1.1 and 2.1.1 to modify the Simplified Process applicability to 50 kWac Nameplate Rating or less and an Export Capacity of 20 kWac or less. These proposed revisions as set forth in Attachment C are shown in Figure 1 below.

Figure 1
Excerpt from Notice of Comment Attachment C

- 1.1.1.1 An application to interconnect a certified⁴, inverter-based DER with a Nameplate Rating of 50 kilowatts (kW) or less and an Export Capacity of ~~no larger than 20 kilowatts (kW)~~ or less shall be evaluated under the Section 2 Simplified Process.
- 2.1.1 For Certified, inverter-based DERs with a Nameplate Rating of 50 kW ac or less and an ~~DER~~ Export Capacity of 20 kW ac or less: The Area EPS Operator shall comport with the Simplified Process, including the time frames described in that process. Simplified Process eligibility does not imply or indicate that a DER will pass the Initial Review Screens, failure to pass the screens will route the application to the Fast Track Process.

³ NOTICE OF COMMENT (April 10, 2026), at PDF p81.

⁴ *Standards for the Interconnection and Operation of Distributed Generation Facilities Established Under Minn. Stat. § 216B.1611*, Docket No. 16-521, ORDER (April 15, 2024) Order 6 (at p10).

We do not support the change to 50 kWac. We support restricting the Simplified Process applicability to a system size of 40 kWac Nameplate Rating or less and an Export Capacity of 20 kWac or less. This is the size limit that is commonly understood to be small scale and usually within the residential or small business market. This would also be consistent with state statutes, Commission Rules, and Commission-approved programs that commonly have a breakpoint of 40 kW for various programs.⁵

Allowing a Nameplate Rating of 50 kWac would have further impacts on MN DIP section 5.10 Insurance, which requires a \$300,000 coverage for systems that are 40 kWac or less and a \$1,000,000 coverage for systems that are larger than 40 kWac but smaller than 250 kWac. In addition, per section 5.10.3, residential services with connected DER having a Nameplate Rating of 40 kWac or below are exempted from meeting the insurance policy endorsement requirements as stated in section 5.10.2. As a result, according to current MN DIP insurance provisions, a residential system that is larger than 40 kWac up to 50 kWac would require insurance coverage of \$1,000,000 and the policy endorsements.

We ask the Commission to reject the proposed change to 50 kWac in MN DIP sections 1.1.1.1 and 2.1.1. Our preferred language is reflected here in clean format:

- 1.1.1.1 An application to interconnect a certified⁴, inverter-based DER with a Nameplate Rating of 40 kilowatts (kW) or less and an Export Capacity of 20 kilowatts (kW) or less shall be evaluated under the Section 2 Simplified Process.
- 2.1.1 For Certified, inverter-based DERs with a Nameplate Rating of 40 kW ac or less and an Export Capacity of 20 kW ac or less: The Area EPS Operator shall comport with the Simplified Process, including the time frames described in that process. Simplified Process eligibility does not imply or indicate that a DER will pass the Initial Review Screens, failure to pass the screens will route the application to the Fast Track Process.

⁵ See, for example, Minn. Stat. § 216B.164, Subds. 3, 3a, 4, 4c, 6; Minn. R. 7835.3300, 7835.3400, Minn. R. 7835.3500, Minn. R. 7835.4012, Minn. R. 7835.5900, Minn. R. 7835.6100; Xcel Energy \$15,000 cost sharing program from Docket No. 18-714 (reflected at Xcel Energy tariff sheet 10-81.4), Priority Queue from Docket Nos. E999/CI-16-521 and E002/M-18-714 (reflected at Xcel Energy tariff sheet 10-81.5), Xcel Energy tariff rates for metering (tariff sheets 10-81.2 and 10-81.3); and the Xcel Energy Solar*Rewards program from Docket No. E002/M-13-1015 (reflected at Xcel Energy tariff sheets 9-13 through 9-49.19).

III. THE COMMISSION SHOULD ADOPT XCEL ENERGY'S POSITIONS ON THE THREE DISPUTED ITEMS IN THE TSG'S REPORT

Although the TSG made significant progress in aligning stakeholder consensus on most revisions to the MN DIP, there were three areas that remain as non-consensus items. Below we articulate our positions for Commission consideration.

A. Deciding on Whether to Use Export Capacity or Nameplate Rating in MN DIP Section 1.1.1 is Out of Scope of the TSG

The first contested item is how the Commission should define the applicability of MN DIP. As currently written, MN DIP applies to any DER 10 MW or less operating in parallel with and interconnecting to the Area EPS local distribution system.⁶ The TSG discussed whether the 10 MW cap should be defined as “Export Capacity” or “Nameplate Rating.” Xcel Energy strongly believes that Nameplate Rating is the appropriate way to consider what constitutes a 10 MW (or less) DER for purposes of applying the statewide uniform MN DIP. Changing from Nameplate Rating to Export Capacity would inappropriately subject substantially larger DER systems to the uniform, statewide MN DIP, even though these systems require more flexibility than MN DIP provides.

Changing the current definition to consider Export Capacity instead of Nameplate Rating for purposes of applying MN DIP would introduce significant risk of disruption or damage to the Area EPS. If the Power Control System that controls the export to the grid fails and that larger than 10 MW full generation is exported to the grid, it could introduce voltage excursions. Even in the absence of a Power Control System failure, the increase in available fault current from a larger than 10 MW DER installation will also require adjustments to system design outside of the norm to ensure safety and reliability.

As an extreme example, if we use Export Capacity as the definition, a 100 MW DER that limits export to 9 MW would be allowed under MN DIP. The risk of the full 100 MW being inadvertently exported to the Area EPS could have very significant consequences considering a 15 kV feeder's rated capacity is typically between just 10 and 13 MW. A DER of this magnitude must be processed through different studies

⁶ The 10 MW cap is referenced in the Forward section of MN DIP, which cites Minn. Stat 216B.1611. This statute also references the Commission being required to initiate a proceeding to establish by Order generic standards for the interconnection of distributed generation of no more than 10 MW of interconnected capacity.

and the necessary system upgrades to ensure safe, reliable operation would be unique to the use case.

To illustrate how we have addressed large DER with small or no export capacity before, docket E002/M-18-714 describes how we interconnected a 45 MW DER at Flint Hills Resources Pine Bend LLC.⁷ In order to interconnect this large DER, we pursued a variation of our normal interconnection application process with more robust studies and proposed an amendment to the standard tariffed Interconnection Agreement to accurately apply the Customer's 45 MW (nameplate rating) DER solar system. If Export Capacity had been used instead, it would have been considered a 0 kW DER (as it is non-exporting), and would have been subject to the MN DIP, which is not what the MN DIP was meant to address.

Xcel Energy is capable of processing larger DER interconnection requests to the Area EPS, but we require more detailed studies and design to ensure the safe and reliable operation. Determining the appropriate studies when Nameplate Rating exceeds 10 MW allows the utility to move the interconnection process forward while evaluating the level of risk associated with equipment failure or system impacts. MN DIP is designed to have a level of risk mitigation applicable for DER only up to 10 MW. For large scale systems above 10 MW, abnormal system conditions can increase risk of damage to equipment, have adverse effects for other customers on the distribution system, and lead to other consequences. Opening the MN DIP applicability to systems of indeterminate Nameplate Rating, even with applied export restrictions, can create instances where the existing distribution system design may not be able to account for the impacts the DER could potentially create.

In addition, Xcel Energy's planning standard will be impacted when DER systems are paired with load. The current Technical Planning Standard (TPS) incorporates a combination of Daytime Minimum Load (DML) and equipment ratings to set capacity limits for interconnection. Allowing facilities to displace large portions of that load would change the results found for previous DER projects. This situation would result in a challenge to the Area EPS operator on which project to assess as the cost causer in the event that upgrades are identified.

The proposed change here would re-interpret capacity differently from how this term has been defined and implemented in other state statutes, and could have other cascading impacts.⁸ We provide here some possible cascading impacts and questions

⁷ *Notice of Proposed Amended Interconnection Agreement with Flint Hills Resources Pine Bend, LLC*, Docket No. E002/M-18-714, NOTICE (October 31, 2023).

⁸ For example, Minn. Stat. 216B.2611 uses the term 10 MW interconnected capacity.

that would need to be addressed if the Commission were to re-interpret the definition of capacity to instead mean Export Capacity:

- What is the Commission’s authority to review major facilities with a capacity of 50 MW or more under Minn. Stat. §216B.24? By changing the interpretation of capacity, the Commission would not have the ability to review those projects that, with the new interpretation, would no longer be determined to be above the 50 MW threshold but which would have met this threshold under the existing long-standing interpretation.
- What is the Commission’s authority to review Large Energy Facilities of 50 MW or more under Minn. Stat. §216B.2421 and Minn. Stat. §216B.243? Similar to the above, by changing the interpretation of capacity, the Commission might not have the ability to review those projects that, with the new interpretation, would no longer be determined to be above the 50 MW threshold.
- What qualifies for the distributed solar energy standards (DSES), which has a limit of 10 MW capacity under Minn. Stat. §26B.1691, Subd. 2h? Changing the interpretation of capacity would enlarge the effective size of projects eligible to be counted towards the DSES, upsetting the legislative intent by allowing systems larger than those contemplated by the legislation to be counted towards compliance with the DSES.

Under the first two examples above, if the non-exporting Flint Hills 45 MW DER project had been 12% larger, it would have exceeded the 50 MW threshold (by conventional measurements using Nameplate Rating), but would still be 0 kW if rated on Export Capacity and therefore would not be subject to Commission review under these statutes. It is important that terms are applied consistently, and in this context it would be consistent to continue to measure the size of DER based on Nameplate Rating. In this way, the Commission would continue to have regulatory oversight of large DER projects as intended by these statutes.

Importantly, the applicability of MN DIP was not part of the TSG’s charter directed by the Commission in its April 15, 2024 Order⁹ and was only addressed towards the end of the subgroup workgroup process. The subgroup did not provide sufficient time for discussion, which has led to this item being so contentious. Discussion of whether MN DIP applicability should be defined by “Export Capacity” or “Nameplate Rating” is out of scope for this subgroup whose focus was limited to battery energy storage systems. Applicability of MN DIP would ordinarily be discussed in a broader DGWG venue, with appropriate representation and a holistic understanding of implications of changing current definitions.

⁹ *Order Establishing a Two-Queue System, Directing Further Discussion, And Addressing Miscellaneous Matters*, Docket No. E999/CI-16-521, ORDER, (April 15, 2024), Ordering Point 7 at p10.

**B. Do Not Modify MN DIP Section 1.1.5.1.2 to Use “Export Capacity;”
Continue to Use “Nameplate Rating”**

MN DIP section 1.1.5.1.2 details when the Uniform Statewide Contract can be used as the Interconnection Agreement and currently has a cap of 20 kWac. We agree with other utilities that this cap could be increased to 40 kWac Nameplate Rating. But we are concerned if this size limit is defined as Export Capacity. Nameplate Rating is the appropriate measure for this item. The utilities’ rationale is well captured in the TSG report.¹⁰

In Minnesota, the use of Nameplate Rating, not export capacity, is well established in many different situations. Above, we also explained that state statute, Commission Rules, and Commission-approved programs frequently have a breakpoint of 40 kW for various programs. For example, the Minnesota PURPA Implementation Statute (Minn. Stat. § 216B.164) uses the capacity of a Qualifying Facility (QF) for purposes of determining the cooperative and municipal utility application of net metering and rates for QFs less than 40 kW (Subd. 3, par. a). This statute uses the capacity of a QF for purposes of determining the public utility application of net metering and rates for QFs having:

- 40 kW or more capacity but less than 1,000 kW capacity (Subd. 3, par. b and Subd. 3a) or
- capacity of less than 40 kW (Subd. 3, pars. b 6 and d), and
- capacity of 1,000 kW or more if interconnected to a public utility (Subd. 4).

Given this statute’s specific deference to PURPA and FERC, and the Commission rules proxying the FERC definition of QF (Minn. R. 7835. 0100, Subp. 19), and given that this statute refers to the capacity of the QF for purposes of applying net metering and other related purposes, the FERC approach to determining the capacity of a QF applies to Minnesota.

FERC considers the “power production capacity” of a QF to be the maximum net output of the facility that can be safely and reliably achieved under the most favorable anticipated design conditions.¹¹ In particular, we draw attention to Row 7b at the capacity calculation table on page 10 of FERC Form 556 which states:

¹⁰ NOTICE OF COMMENT (April 10, 2026) Attachment A at p13.

¹¹ See FERC Form 556, <https://www.ferc.gov/media/form-no-556> p. 10. Further, note that the capacity of a QF is determined by FERC to be the “net power production capacity,” but when the same related owner has more than one PV system within one-mile (or in some circumstances up to within 10 miles) the QF capacity is the aggregate total sum of the net power production capacity from this set of inverters and this is to be

7b Parasitic station power used at the facility to run equipment which is necessary and integral to the power production process (boiler feed pumps, fans/ blowers, office or maintenance buildings directly related to the operation of the power generating facility, etc.). If this facility includes nonpower production processes (for instance, power consumed by a cogeneration facility's thermal host), do not include any power consumed by the non-power production activities in your reported parasitic station power.¹²

We emphasize the last several lines of the above excerpt, which show that nonpower production processes are not to be netted out of the calculation of the net electric power capacity calculation for the facility.

FERC has specified that “[t]he net output of the facility is its send out after subtraction of the power used to operate auxiliary equipment in the facility necessary for power generation (such as pumps, blowers, fuel preparation machinery, and exciters) and for other essential electricity uses in the facility from the gross generator output.” *Occidental Geothermal, Inc.*, 17 FERC ¶ 61,231 at 61,445 (1981). See also *Conn. Valley Elec. Co. v. Wheelabrator Claremont Co.*, 82 FERC ¶ 61,116 (1998). In addition, line losses from the QF to the point of interconnection are also deducted to determine net output. *See id.*

Xcel Energy has consistently used “net power production capacity” for determining the size of the QF of a single DG system for purposes of:

- Applying net metering tariffs;
- Determining eligibility for the \$15,000 cost sharing program as specified on tariff sheet 10-81.4 for MN DIP applications which are 40 kW AC or less; and,
- Determining whether a MN DIP application should be in the “priority” or “general” queue as specified on tariff sheet 10-81.5 where the priority queue is for applications up to 40 kW.

Under this approach, it is assumed that other than load needed to power the inverters, there is no other on-site load offset for purposes of determining the net power production capacity. The Company also uses this methodology for required reporting under Minn. R. 7835.1300, .1400, and .1500 and other reporting.

Further, using Export Capacity for purposes of MN DIP while retaining Nameplate Capacity for purposes of determining system size and eligibility for Net Metering

considered as a single QF that is comprised of all of these inverters. See, *SunE B9 Holdings* (129 FERC ¶ 61,044), order of October 20, 2016.

¹² See FERC Form 556, <https://www.ferc.gov/media/form-no-556>

under the Uniform Statewide Contract and for the Solar*Rewards program would be counterintuitive and lead to situations where one capacity size is used for MN DIP and the Interconnection Agreement, while for this same DER a different system size would be used for the Uniform Statewide Contract. Answering a simple question such as “what is the size of the DER?” would cause confusion with two different answers.

C. In MN DIP Section 5.14.3 Use the Utility Preferred Wording

In MN DIP Section 5.14.3, utilities recommend the following wording:

*A DER using an acceptable control method is required to execute an Interconnection Agreement and the Export Capacity specified by the Interconnection Customer in the Interconnection Agreement will subsequently be included as a limitation in the Interconnection Agreement.*¹³

As summarized in the TSG report, we have significant concerns that the current Uniform Statewide Contract does not envision Export Capacity.¹⁴ The Nameplate Rating of a system is a record of the maximum capacity that can be generated at the Point of Common Coupling (PCC). Modifications to the Export Capacity of the DER at the PCC would impact the operating characteristics and should be recorded. Interconnection Agreements must be clear on the agreed upon capacity the DER is approved to export based on review or study criteria.

Other stakeholders propose that Interconnection Agreements be limited to the Export Capacity of a DER. Xcel Energy and other utilities do not oppose this recommendation. However, we feel strongly that MN DIP language must specify that there needs to be an acceptable control method to apply the export capacity as a limit in the Interconnection Agreement. Without specifying this explicitly in MN DIP, utilities run the risk of DERs entering Interconnection Agreements without an approved export control method. DERs without recognized acceptable control methods can create unacceptable risk to the safety and reliability of the distribution system. It is important that utilities have a record and enforceable mechanism to ensure DER are limiting their export to the amount reviewed or studied and recorded in the Interconnection Agreement. Establishing an Interconnection Agreement of adjusted Export Capacity and Acceptable Control Method provides benefits to both parties.

¹³ NOTICE OF COMMENT (April 10, 2026), Attachment A at p17.

¹⁴ NOTICE OF COMMENT (April 10, 2026) at p17-18.

IV. THE COMMISSION SHOULD NOT EXTEND THE TEMPORARY ANNUAL REPORTING ON INTERCONNECTION THROUGH AT LEAST 2030 BY MODIFYING THE REQUIREMENT IN THE AUGUST 13, 2018 ORDER

In its August 13, 2018 Order, the Commission established annual reporting requirements for utilities to show compliance with various MN DIP timelines.¹⁵ Commission Staff provides Xcel Energy a template, updated on an annual basis, that incorporates the subparts of Ordering Point 20. Xcel Energy has reported on the required metrics using this template on an annual and quarterly basis.

The provided template does not differentiate between utility milestones and applicant milestones for certain processes, such as Completeness Review. For example, the template tracks the number of business days from Date A to Date B, but within this timeframe there are actions for the utility to take and the applicant to take. If the applicant takes more time than allocated, this leads to the misrepresentation that the utility is the source of the delay in processing an application and is out of compliance with MN DIP. Because it is difficult to identify the Company's performance on its MN DIP milestones in this reporting process, we do not support continuing this compliance requirement. The current reporting statistics misrepresent the holistic picture of Xcel Energy's responsiveness to MN DIP requirements. Xcel Energy recommends the Commission not extend the annual reporting by modifying the requirement in the August 2018 Order.

CONCLUSION

We commend the DGWG subgroup for robust and comprehensive deliberations. Below we summarize our key conclusions.

- We recommend the Commission adopt the DGWG TSG's proposed changes to the TIIR.
- We recommend the Commission adopt the consensus changes to the MN DIP, excluding the the changes to MN DIP 1.1.1.1 and 2.1.1. Instead, for these two sections we recommend the Commission adopt the following wording:

1.1.1.1 An application to interconnect a certified[#], inverter-based DER with a Nameplate Rating of 40 kilowatts (kW) or less and an Export Capacity of 20 kilowatts (kW) or less shall be evaluated under the Section 2 Simplified Process.

¹⁵ Order Establishing Updated Interconnection Process and Standard Interconnection Agreement, Docket No. E-999/CI-16-521, DECISION ORDER (August 13, 2018), at p31.

2.1.1 For Certified, inverter-based DERs with a Nameplate Rating of 40 kW ac or less and an Export Capacity of 20 kW ac or less: The Area EPS Operator shall comport with the Simplified Process, including the time frames described in that process. Simplified Process eligibility does not imply or indicate that a DER will pass the Initial Review Screens, failure to pass the screens will route the application to the Fast Track Process.

- For contested issues, we recommend the Commission:
 - Concur that deciding on whether to use Nameplate or Export Capacity in MN DIP section 1.1.1 is out of scope.
 - Continue to use Nameplate Rating in MN DIP section 1.1.5.1.2.
 - Concur that MN DIP section 5.14.3 must specify that “A DER using an acceptable control method is required to execute an Interconnection Agreement and the Export Capacity specified by the Interconnection Customer in the Interconnection Agreement will subsequently be included as a limitation in the Interconnection Agreement.”
- We recommend the Commission not extend the annual reporting requirements outlined in its August 13, 2018 Order.

Dated: May 01, 2026

Northern States Power Company

CERTIFICATE OF SERVICE

I, Joshua DePauw, 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. E999/CI-16-521

Dated this 1st day of May 2026

/s/ _____
Joshua DePauw
Regulatory Administrator

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18	Christopher	Browning	christopher.browning@nexteraenergy.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
19	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	16-521Official Service List PUC
20	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	16-521Official Service List PUC
21	Jerry	Byer	jbyer@itasca-mantrap.com	Itasca-Mantrap Electric Cooperative		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	16-521Official Service List PUC
22	Daniel T	Carlisle	todd-wad@toddwadena.coop	Todd-Wadena Electric Cooperative		550 Ash Ave NE PO Box 431 Wadena MN, 56482 United States	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
23	Douglas M.	Carnival	dcarnival@carnivalberns.com	McGrann Shea Carnival Straughn & Lamb		800 Nicollet Mall Ste 2600 Minneapolis MN, 55402-7035 United States	Electronic Service		No	16-521Official Service List PUC
24	Pat	Carruth	pat@mnvalleyrec.com	Minnesota Valley Coop. Light & Power Assn.		501 S 1st St. PO Box 248 Montevideo MN, 56265 United States	Electronic Service		No	16-521Official Service List PUC
25	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	16-521Official Service List PUC
26	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	16-521Official Service List PUC
27	Kevin	Cray	kevin@communitysolaraccess.org	CCSA		1644 Platte St Denver CO, 80202 United States	Electronic Service		No	16-521Official Service List PUC
28	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	16-521Official Service List PUC
29	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	16-521Official Service List PUC
30	George	Damian	gdamian@cleanenergyeconomymn.org	Clean Energy Economy MN		13713 Washburn Ave S Burnsville MN, 55337 United States	Electronic Service		No	16-521Official Service List PUC
31	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	16-521Official Service List PUC
32	James	Darabi	james.darabi@solarfarm.com			2355 Fairview Ave #101 St. Paul MN, 55113 United States	Electronic Service		No	16-521Official Service List PUC
33	Danielle	DeMarre	danielle.demarre@allenergysolar.com	All Energy Solar		1264 Energy Lane St Paul MN, 55108	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
34	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	16-521Official Service List PUC
35	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	16-521Official Service List PUC
36	Cheryl	Dietrich	cheryl.dietrich@nexteraenergy.com	NextEra Energy Resources, LLC		700 Universe Blvd E1W/JB Juno Beach FL, 33408 United States	Electronic Service		No	16-521Official Service List PUC
37	Kristin	Dolan	kdolan@meeker.coop	Meeker Cooperative Light & Power Assn		1725 US Hwy 12 E. Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	16-521Official Service List PUC
38	Renee	Doyle	guydoyleelectric@gmail.com	Doyle Electric Inc.		PO Box 295 Amboy MN, 56010 United States	Electronic Service		No	16-521Official Service List PUC
39	John R.	Dunlop, P.E.	jdunlop@resminn.com	Renewable Energy Services		Suite 300 448 Morgan Ave. S. Minneapolis MN, 55405-2030 United States	Electronic Service		No	16-521Official Service List PUC
40	Kelly	Dybdahl	kdybdahl@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.		205 W. Hwy. 14 Tyler MN, 56178 United States	Electronic Service		No	16-521Official Service List PUC
41	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	16-521Official Service List PUC
42	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	16-521Official Service List PUC
43	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	16-521Official Service List PUC
44	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
45	Kornbaum	Frank	fkornbaum@mnpower.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
46	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	16-521Official Service List PUC
47	Katelyn	Frye	kfrye@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	16-521Official Service List PUC
48	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	16-521Official Service List PUC
49	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	16-521Official Service List PUC
50	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	16-521Official Service List PUC
51	Sarah	Groebner	sgroebner@redwoodelectric.com	Redwood Electric Cooperative		60 Pine St Clements MN, 56224 United States	Electronic Service		No	16-521Official Service List PUC
52	Cody	Gustafson	cgustafson@mnpower.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
53	Tom	Guttormson	tom.guttormson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd Ramsey MN, 55303 United States	Electronic Service		No	16-521Official Service List PUC
54	Natalie	Haberman	townsend@fresh-energy.org	Fresh Energy		408 St Peter St # 350 St. Paul MN, 55102 United States	Electronic Service		No	16-521Official Service List PUC
55	James	Haler	jhaler@southcentralelectric.com	South Central Electric Association		71176 Tiell Dr P. O. Box 150 St. James MN, 56081 United States	Electronic Service		No	16-521Official Service List PUC
56	Donald	Hanson	dfhanson@ieee.org			P. O. Box 44579 Eden Prairie	Electronic Service		No	16-521Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55344 United States				Service List PUC
57	John	Harlander	john.c.harlander@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC
58	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	16-521Official Service List PUC
59	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
60	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
61	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	16-521Official Service List PUC
62	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	16-521Official Service List PUC
63	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	16-521Official Service List PUC
64	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	16-521Official Service List PUC
65	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	16-521Official Service List PUC
66	Casey	Jacobson	cjacobson@bepec.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	16-521Official Service List PUC
67	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
79	Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power		1725 US Hwy 12 E Litchfield MN, 55355 United States	Electronic Service		No	16-521Official Service List PUC
80	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	16-521Official Service List PUC
81	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
82	Corrina	Kumpe	ckumpe@mysunshare.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
83	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	16-521Official Service List PUC
84	Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar		3209 W. 76th St #305 Edina MN, 55435 United States	Electronic Service		No	16-521Official Service List PUC
85	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	16-521Official Service List PUC
86	Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
87	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	16-521Official Service List PUC
88	Carl	Linville	cliville@raponline.org			50 State Street Suite #3 Montpelier VT, 05602 United States	Electronic Service		No	16-521Official Service List PUC
89	Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products		PO Box 108 Springfield MN, 56087 United States	Electronic Service		No	16-521Official Service List PUC
90	Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy		414 Nicillet Mall 7th Floor	Electronic Service		No	16-521Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55401-1993 United States				Service List PUC
91	Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.		PO Box 1156 Latham NY, 12110-1156 United States	Electronic Service		No	16-521Official Service List PUC
92	Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.		10710 Town Square Dr NE Ste 201 Minneapolis MN, 55449 United States	Electronic Service		No	16-521Official Service List PUC
93	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	16-521Official Service List PUC
94	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	16-521Official Service List PUC
95	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	16-521Official Service List PUC
96	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service		No	16-521Official Service List PUC
97	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	16-521Official Service List PUC
98	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	16-521Official Service List PUC
99	Tim	Mergen	tmergen@meeker.coop	Meeker Cooperative Light And Power		1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield MN, 55355 United States	Electronic Service		No	16-521Official Service List PUC
100	Pontius	Mike	mpontius@mnpower.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
101	Luther	Miller	luther.c.miller@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
102	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	16-521Official Service List PUC
103	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	16-521Official Service List PUC
104	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
105	Alex	Nelson	anelson@dakotaelectric.com	Dakota Electric Association		4300 220nd St Farmington MN, 55024 United States	Electronic Service		No	16-521Official Service List PUC
106	Ben	Nelson	benn@cmpasgroup.org	CMPMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	16-521Official Service List PUC
107	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
108	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	16-521Official Service List PUC
109	Rolf	Nordstrom	rnordstrom@gpsid.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	16-521Official Service List PUC
110	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	16-521Official Service List PUC
111	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	16-521Official Service List PUC
112	Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc		P.O. Box 639 Tyler MN, 56178-0639	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
113	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	16-521Official Service List PUC
114	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	16-521Official Service List PUC
115	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Fergus Falls MN, 56537 United States	Electronic Service		No	16-521Official Service List PUC
116	Bethany	Owen	bowen@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	16-521Official Service List PUC
117	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
118	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	16-521Official Service List PUC
119	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	16-521Official Service List PUC
120	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	16-521Official Service List PUC
121	Susan	Peirce	susan.peirce@state.mn.us		Department of Commerce	85 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
122	Wess	Pfaff	wes.pfaff@mrenergy.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
123	Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel		null null, null United States	Electronic Service		No	16-521Official Service List PUC
124	Elizabeth	Psihos	elizabeth.psihos@idealenergies.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
125	Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC		3363 Republic Ave Saint Louis Park MN, 55426 United States	Electronic Service		No	16-521Official Service List PUC
126	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	16-521Official Service List PUC
127	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	16-521Official Service List PUC
128	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	16-521Official Service List PUC
129	Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC		1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	16-521Official Service List PUC
130	Daniel	Rogers	dan@nokomispartners.com			2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	16-521Official Service List PUC
131	Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC
132	Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electrical Association		PO Box 529 24386 State Highway 4 Sleepy Eye MN, 56085 United States	Electronic Service		No	16-521Official Service List PUC
133	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	16-521Official Service List PUC
134	Kenric	Scheevel	kjs@dairynet.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602 United States	Electronic Service		No	16-521Official Service List PUC
135	Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
136	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	16-521Official Service List PUC
137	Matthew	Schuerger	matthew.schuerger@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
138	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	16-521Official Service List PUC
139	Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	16-521Official Service List PUC
140	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	16-521Official Service List PUC
141	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	16-521Official Service List PUC
142	Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power		1725 US Highway 12 E Suite 100 Litchfield MN, 55355 United States	Electronic Service		No	16-521Official Service List PUC
143	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
144	Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy		800 LaSalle Avenue P.O. Box 59038 Minneapolis MN, 55459-0038 United States	Electronic Service		No	16-521Official Service List PUC
145	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	16-521Official Service List PUC
146	Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Association		24386 State Hwy. 4, PO Box 529 Sleepy Eye MN, 56085	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
147	Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies		5810 Nicollet Ave Minneapolis MN, 55419 United States	Electronic Service		No	16-521Official Service List PUC
148	Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy		401 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	16-521Official Service List PUC
149	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	16-521Official Service List PUC
150	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
151	Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric		PO Box 58 Slayton MN, 56172 United States	Electronic Service		No	16-521Official Service List PUC
152	Bryant	Tauer	btauer@whe.org	Wright-Hennepin		6800 Electric Dr Rockford MN, 55373 United States	Electronic Service		No	16-521Official Service List PUC
153	Emma Marshall	Torres	emarshall-torres@convergentep.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
154	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	16-521Official Service List PUC
155	Jeff	Triplett	triplettj@powersystem.org	MREA		10710 Town Square Dr NW St 201 Minneapolis MN, 55449 United States	Electronic Service		No	16-521Official Service List PUC
156	Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric		P.O. Box 58 Slayton MN, 56127-0058 United States	Electronic Service		No	16-521Official Service List PUC
157	Lise	Trudeau	lise.trudeau@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
158	Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
159	Ellen	Veazey	lveazey@solarunitedneighbors.org	Solar United Neighbors		1350 Connecticut Ave NW Ste 412 Washington DC, 20036 United States	Electronic Service		No	16-521Official Service List PUC
160	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	16-521Official Service List PUC
161	Wendy	Vorasane	wendy.vorasane@idealenergies.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
162	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	16-521Official Service List PUC
163	Samantha	Weaver	samantha@communitysolaraccess.org	Coalition for Community Solar Access		1380 Monroe St. Washington DC DC, 20010 United States	Electronic Service		No	16-521Official Service List PUC
164	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	16-521Official Service List PUC
165	John	Williamson	john.williamson@state.mn.us	Minnesota Department of Labor and Industry		443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	16-521Official Service List PUC
166	Danielle	Winner	danielle.winner@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
167	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	16-521Official Service List PUC
168	Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box Sioux Falls SD, 57109-8920 United States	Electronic Service		No	16-521Official Service List PUC
169	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						8920 United States				