

November 7, 2025

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. E002,E015,E017/CI-24-288

Dear Ms. Bergman,

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*In the Matter of Establishing Tariffs for Distribution System Cost Sharing for
Interconnection in Constrained Areas*

The commission investigation was initiated by the Commission on August 30, 2024.

The Department recommends approval of the Reactive DER Upgrade Cost Sharing Standards, and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

AZ/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E002,E015,E017/CI-24-288

I. INTRODUCTION

The Minnesota Public Utilities Commission (Commission) will consider the first distributed energy resource (DER) reactive cost share framework. The cost share framework results from the passage of Laws of Minn. 2024, ch. 126, art. 4, sec. 53,¹ which requires the Commission to establish generic standards designed to accelerate the adoption of DER by sharing distribution upgrade costs amongst a pool of DER developers instead of a single cost causer that pays for the benefits received by subsequent interconnections.

The Distribution System Reactive Upgrade Process (DSRUP) were developed by a stakeholder process led by the Commission, and outline the rules by which reactive DER cost sharing will take place. The majority of the DSRUP was developed under a consensus process, however there are still several areas where consensus requirements were not reached, and require the Commission's decision.

The Department developed the majority of its positions with the Office of the Attorney General – Residential Utilities Division (OAG-RUD) and is aligned with OAG-RUD on the majority of issues.

II. PROCEDURAL BACKGROUND

May 4, 2024	Laws of Minn. 2024, ch. 126, art. 4, sec. 53 is passed.
August 30, 2024	Commission opens the current proceeding as required by law. ²
September 26, 2024	Commission invites stakeholders to join the DER Cost Sharing Workgroup to write the DSRUP. ³
September 26, 2025	Commission issues its Notice of Comment Period. ⁴

¹ [Laws of Minn. 2024, ch. 126, art. 4, sec. 53](#)

² *In the Matter of a Commission Inquiry into a Framework for Proactive Distribution Grid Upgrades and Cost Allocation for Xcel Energy, Notice of Docket Opening*, August 30, 2024, Docket No. E002,E015,E017/CI-24-288, (eDockets) [20248-209885-01](#).

³ *Notice Soliciting Stakeholder Members*, September 26, 2024, Docket No. E002,E015,E017/CI-24-288, (eDockets) [20249-210501-01](#).

⁴ *Notice of Comment Period*, September 26, 2025, Docket No. E002,E015,E017/CI-24-288, (eDockets), [20259-223328-01](#), (hereinafter "Notice").

Topic(s) open for comment:

- Notice Topic 1: What draft generic standards, outlined in Attachment A and Attachment B should the Commission adopt for the DSRUP? Please provide a rationale for why you support, oppose, or take no position on contested sections of the Standards.
 - A word document of the draft standards is available upon request
 - Staff requests commenters provide a list of all sections their organization supports, opposes, or takes no position on in their comments
 - If there are modifications to sections, please include a redline of changed language
- Notice Topic 2: Do the draft standards address and accomplish the goals and requirements described in the Minnesota Session Laws - 2024, Regular Session, CHAPTER 126—S.F.No. 4292, Article 6, Section 53?
- Notice Topic 3: Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

A. *WHAT DRAFT GENERIC STANDARDS, OUTLINED IN ATTACHMENT A AND ATTACHMENT B SHOULD THE COMMISSION ADOPT FOR THE DSRUP? PLEASE PROVIDE A RATIONALE FOR WHY YOU SUPPORT, OPPOSE, OR TAKE NO POSITION ON CONTESTED SECTIONS OF THE STANDARDS.*

The Department is generally supportive of the DSRUP framework. The Department offers comments on each section of the DSRUP, which is included as Attachment A of the Notice, as follows.

A.1. *Section A. Introduction*

Section A. of the DSRUP covers the introduction and statutory background for the DSRUP. There are no subsections that require a Commission decision in this section. The Department has no comments about this section.

A.2. *Section B. Definitions*

Section B. of the DSRUP covers definitions. The Department refers to the definitions in this section as proper nouns. There are subsections that require a Commission decision in this section. The Department has no comments about this section.

A.3. *Section C. Upgrade Cost Thresholds*

Section C. of the DSRUP covers cost thresholds for DSRUP eligibility. The cost thresholds set a mandatory minimum project cost cap, and set an optional maximum cost cap. The Department does not take a position on the mandatory minimum cost floor, but recommends a \$300,000 MW_{AC} cost cap. Pursuant to Laws of Minn. 2024, ch. 126, art. 4, section 53(a)(3), the standards adopted by the Commission should be designed to:

establish a minimum level of upgrade costs an expansion of hosting capacity must reach in order to be eligible to participate in the cost-share

process and below which a trigger project must bear the full cost of the upgrade;

There are two subsections that require a Commission decision in this section. The first subsection states:

1 must be adopted, and the Commission must choose one subpart.

1. To qualify for the DSRUP, an Upgrade must have total project costs of:

- a. at least \$250,000
- b. at least \$1
- c. at least \$2,500,000
- d. \$100,000⁵

The second subsection states:

2 may be adopted with one subpart. If the Commission does not wish to set a maximum limit, it may simply not adopt 2.

2. To qualify as an eligible Reactive Cost Share Distribution Upgrade, an Upgrade must cost no more than:

- a. \$300,000/MW_{AC}
- b. \$600,000/MW
- c. No maximum⁶

These two decision subsections both relate the project eligibility cost limits. The first decision subsection sets the statutorily mandated cost floor for upgrades, as required by Laws of Minn. 2024, ch. 126, art. 4, sec. 53(a)(3). The second decision option is not required.

The Department does not take a position on the minimum cost threshold. There are advantages and disadvantages to higher and lower cost thresholds. A cost threshold of \$2,500,000 will likely only involve substation upgrades and new or heavily modified feeder lines. This threshold will greatly reduce the potential number of projects and avoids the problem of multiple parent-child upgrade requirements that could be created with a smaller cost eligibility threshold.

Take the simple example of a substation with 2 feeder lines. The substation requires an upgrade that costs \$3 million, which creates 15 MW_{AC} of new hosting capacity at a cost of \$200,000 / MW_{AC}. In order to utilize the full capacity of the upgrade, Feeder A requires an upgrade of \$250,000 and opens 5 MW_{AC}

⁵ Notice Attachment A at 4.

⁶ *Ibid.*

of the new capacity created at the substation, which is normalized to a cost of \$50,000 / MW_{AC}. Feeder B requires an upgrade of \$1,250,000 and opens 10 MW_{AC} of the new capacity created at the substation, at a normalized cost of \$125,000 / MW_{AC}. If the project scope does not include the feeders, then each project pays \$200,000 / MW_{AC} and the upgrades needed for the feeder lines will be paid under existing processes.

If the project scope includes the feeders, then projects on Feeder A will pay \$250,000 / MW_{AC}, and projects on Feeder B will pay \$325,000 / MW_{AC}. If the maximum project costs are capped at \$300,000 / MW_{AC}, as preferred by the Department, then projects on Feeder B will exceed the cost cap, and projects on Feeder A will not exceed the cost cap. Alternatively, if Feeders A and B are combined with the substation cost, then the total cost would be \$300,000 / MW_{AC}, which does meet the Department's cost cap recommendation.

Now take the example of a 1 MW project on Feeder B in a dense urban area that requires a tap line reconductor at a cost of \$300,000, which creates 2 MW_{AC} of total hosting capacity on the tap line at a cost of \$150,000 / MW_{AC}. If the minimum cost threshold is \$250,000, then this project would be eligible for the cost share program and could begin construction at a 50 percent mobilization threshold. If the substation project, feeder project, and tap line project are treated individually, then the project will pay \$200,000 / MW_{AC} plus \$125,000 / MW plus \$150,000 / MW_{AC}, which totals \$475,000 / MW_{AC}. However, if the cost eligibility threshold is \$1,000,000, then the substation project and feeder line project will be eligible, but not the tap line reconductor project, which raises the total project cost to \$625,000 / MW_{AC}, and would exceed the \$600,000 / MW_{AC} cost cap option, albeit outside the scope of the DSRUP.

Both the scope and scale of the DSRUP will significantly impact which project costs are quantified, and how finely a utility must analyze the potential for additional projects. In the above example of a tap line reconductor project, the 1 MW project may be the only physical location open in the dense urban area, and if the project is mobilized at 50 percent, the remaining 50 percent may get socialized to ratepayers if the tap line land availability is not appropriately analyzed. As the minimum cost threshold decreases, the utility must engage in increasingly granular analysis of its system to ensure that hosting capacity is actually available, particularly for highly site-specific areas such as tap lines. Conversely, the higher the minimum cost threshold is set, the greater the opportunity there is for costs to go unaccounted for. In the tap line project example, if the cost threshold only includes the substation upgrade cost, then the developer would be faced with the \$200,000 substation upgrade plus the \$1,250,000 feeder upgrade plus the \$300,000 tap line upgrade, for a total upgrade cost of \$1,750,000. The total installed cost of the 1 MW project may only be \$2,200,000,⁷ which would very likely make the project uneconomic. Even if the feeder and substation upgrade costs are included in the DSRUP, the total pro-rata would be \$300,000 / MW_{AC}, which is 13.6 percent of the total installed cost, and does not include the additional \$300,000 to upgrade the tap line, which raises the total upgrade costs to \$600,000, or 27.2 percent of the total installed cost.

⁷ \$1.7 / MW for systems larger than 1 MW. Assumed Inverted Load Ratio (ILR) of 1.3. Galen Barbose, Naïm Darghouth, Eric O'Shaughnessy, and Sydney Forrester. *Tracking the Sun Pricing and Design Trends for Distributed Photovoltaic Systems in the United States 2024 Edition*. Lawrence Berkeley National Laboratory (August 2024). At 36. Available at: https://eta-publications.lbl.gov/sites/default/files/2024-10/tracking_the_sun_2024_report.pdf.

The Department does not take a position on the minimum upgrade threshold at this time. As this section has clearly articulated, the scope and scale of costs to be included in the final project size should be the most important factor to consider to avoid uneconomic projects because of costs outside of the project scope.

The Department's preferred cost cap of \$300,000 / MW_{AC} attempts to disqualify projects that may not be economically feasible in their totality. The more expensive a project upgrade becomes, the higher the incentive becomes to locate a project in a cheaper location, or to simply not build the project at all. The risk of ratepayer socialization of the unfunded outstanding costs increases with higher pro-rata costs, which should have a limit. Additional pressures on the cost of solar, which include the rescission of tax credits with the passage of the recent federal budget reconciliation bill, H.R. 1,⁸ and tariffs introduce further financial stresses on solar projects, which further necessitates cost controls on upgrade costs. A cost cap ensures that DSRUP projects are most likely to be used and useful.

The Department recommends the Commission adopt C.2.a.

A.4. Section D. Pro Rata Cost Calculation

Section D. of the DSRUP covers the calculation of Pro Rata costs. This section addresses Laws of Minn. 2024, ch. 126, art. 4, sec. 53(a)(4), which states the standards adopted by the Commission must:

establish a distributed generation facility's pro rata cost-share amount as the utility's total cost of the upgrade divided by the incremental capacity resulting from the upgrade, and multiplying the result by the capacity of the distributed generation facility seeking interconnection;

Subsection D.1 addresses the statutory requirement.

There are no subsections that require a Commission decision in this section.

The Department notes that subsections D.3, and D.4 are not statutorily required, but these subsections represent important ratepayer protections. Subsections E.3 and E.4 state:

3. Final Reactive Cost Share Contributions shall not exceed 125% of the estimated Reactive Cost Share Contribution assigned to a Reactive Cost Share Customer in an executed interconnection agreement.

4. Final total costs of an Upgrade in excess of 125% of the estimated total Upgrade cost shall be borne by Utility shareholders rather than recovered through rates.⁹

Subsection D.3 ensures that developers are not responsible for unlimited cost increases, and limits the liability of developers to absorb unplanned costs. As discussed in the previous section, it is important to provide some level of cost insulation for Reactive Cost Share Participants to prevent projects from

⁸ Public Law 119-21.

⁹ Notice Attachment A at 5.

becoming uneconomical. High Reactive Cost Share Contributions risk ratepayer money if the outstanding costs of the project are not recovered after construction due to unfavorable economics. Subsection D.4 directs cost overages above 125 percent of the estimated upgrade cost to be borne by utility shareholders instead of ratepayers. Per the DSRUP, utilities will earn a return on capital expenditures, and should therefore bear some of the risk. In addition, the risk of utility shareholder liability strongly incentivizes utilities to ensure that cost estimates are accurate.

A.5. Section E. Interconnection Processes

Section E. of the DSRUP covers the process by which projects are initiated under the DSRUP, as well as how interconnection and payments are handled. The Department does not take a position in this section. This section addresses Laws of Minn. 2024, ch. 126, art. 4, sec. 53(a)(7), which requires the standards adopted by the Commission must be designed to:

prohibit owners of distributed generation facilities from using any unsubscribed capacity at an interconnection that has undergone an upgrade without the distributed generation owners paying the distributed generation owner's pro rata cost of the upgrade;

The entire section covers rules that prevent projects from being constructed without a Reactive Cost Share Contribution.

There is one subsection that requires a Commission decision in this section. The subsection states:

The Commission must choose either subpart 4a or 4b.

4. An Interconnection Application with a nameplate rating more than 40 kWac is eligible to participate in an active Mobilization Window:

a. Once its Interconnection Application has completed a System Impact Study and, if necessary, a Facilities Study as required by MN DIP.

OR

b. After all applicable MN DIP studies have been completed.¹⁰

The Department does not take a position on this decision subsection. Reactive Cost Share Participants and utilities are in the best position to advocate for their preferred positions.

A.6. Section F. Mobilization Threshold and Window

Section D. of the DSRUP covers the mobilization threshold and duration that is used to trigger construction of a project. The Department recommends an 80 percent Mobilization Threshold. This

¹⁰ *Id.*, at 6.

section addresses Laws of Minn. 2024, ch. 126, art. 4, sec. 53(a)(5), which requires the standards adopted by the Commission must:

establish a minimum proportion of the total upgrade cost that a utility must receive from one or more distributed generation facilities before initiating constructing an upgrade;

There is one subsection that requires a Commission decision in this section. The subsection states:

The Commission must choose one subpart of 1.

1. The Mobilization Threshold for an individual Upgrade is set at:

- a. 25 percent of total Upgrade costs.
- b. 80 percent of total Upgrade costs.
- c. The Mobilization Thresholds shall be tiered based on cost per MW of capacity added by the Upgrade as follows:
 - \$1/MW - \$149,999/MW: 30%
 - \$150,000/MW - \$249,999/MW: 45%
 - \$250,000/MW - \$349,999/MW: 60%
 - \$350,000/MW - \$449,999/MW: 75%
 - \$450,000/MW - \$600,000/MW: 80%¹¹

The Mobilization Threshold is an important feature of the DSRUP, as it is directly related to ratepayer risk. The Mobilization Threshold determines the percentage of the total reactive upgrade project cost that must be paid for before a project can begin construction. A high Mobilization Threshold would require that there is significant interest in a project such that the project is almost fully subscribed before construction may commence. By nature of the high subscription rate, it is more likely that the final Outstanding Costs will be paid for within the Payback Period. Conversely, a low Mobilization Threshold allows a small percentage Reactive Cost Share Participants to make a Reactive Cost Share Contribution before construction begins. A low mobilization threshold increases the risk that mobilization is only economically feasible for a small number of Reactive Cost Share Participants due to a competitive edge, which means that unmobilized capacity costs will be passed onto ratepayers. Examples of a competitive edge could include:

- A. Cheap land that is otherwise inaccessible to other projects
- B. Unique access to unconstrained feeder or tap lines
- C. Discounted equipment costs due to a reduction or cancellation of a separate project's scope and liquidation of its assets

¹¹ *Id.*, at 7.

The Commission can effectively mitigate this risk by selecting a capacity cost cap, such that upgrade costs do not provide challenging economics for the majority of projects.

In isolation, the Mobilization Threshold would be a highly impactful measure for ratepayer protection. However, the Mobilization Threshold does not act in isolation, and works in conjunction with the Annual Ratepayer Cost Cap to limit the total ratepayer liability to rate base unrecovered project costs. The Annual Ratepayer Cost Cap—which is addressed by Section J of the DSRUP and later discussed in Section III.A.10 of these comments—is the most important measure of ratepayer protection because the limit establishes the maximum cost that ratepayers must pay. The combination of the Mobilization Threshold with the Annual Ratepayer Cost Cap yields the total spending available for construction. The Mobilization Threshold is best conceptualized as a ratio. If there is a \$1,000,000 project, and the Mobilization Threshold is 50 percent, then \$500,000 will be insured by ratepayers and \$500,000 will be paid by Reactive Cost Share Participants. The ratio of ratepayer money to Reactive Cost Share Participant money is 1:1 at a 50 percent mobilization threshold. At 25 percent, ratepayers insure \$750,000 and Reactive Cost Share Participants pay \$250,000, which is a ratio of 1:0.33. This ratio means that every ratepayer dollar is backed by \$0.33 of Reactive Cost Share Participant money. Conversely, at 80 percent, the ratio is 1:4, which means that every ratepayer dollar is backed by 4 dollars of Reactive Cost Share Participant money. A high Mobilization Threshold means that many more projects will get built compared to a low Mobilization Threshold, provided that there is sufficient interest from Reactive Cost Share Participants to reach the Mobilization threshold up to the Annual Ratepayer Cost Cap.

The Mobilization Threshold also interacts with the capacity cost cap, which is displayed in Table 1 below. At a \$25,000,000 Annual Ratepayer Cost Cap and a \$100,000 / MW_{AC} capacity cost, the total potential capacity upgrade at a 25%, 50%, and 80% Mobilization Threshold is 333.3, 500, and 1,250 MW_{AC}, respectively. Holding the Annual Ratepayer Cost Cap constant, there is an additional 916.7 MW_{AC} of capacity available in the 80 percent Mobilization Threshold compared to the 25 percent Mobilization Threshold. If the cost of capacity reaches the Department's preferred maximum capacity cost of \$300,000 / MW_{AC}, then the available capacity is reduced by a factor of 3, which results in 111.1, 116.7, and 416.7 MW_{AC} of capacity available at the 25%, 50% and 80% Mobilization Thresholds, respectively. If the cost of capacity reaches the proposed \$600 / MW_{AC} limit, the capacity is cut in half again, which results in 55.5, 83.3, and 208.3 MW_{AC} of capacity available at the 25%, 50% and 80% Mobilization Thresholds, respectively. The Department notes that the limits presented would be the minimum capacity available, because the potential capacity cost caps are the maximum cost, while average costs could be significantly lower at each proposed cost cap level. These examples illustrate how the capacity cost cap works in unison with the Annual Ratepayer Cost Cap and Mobilization Threshold to deliver more capacity at a lower risk to ratepayers.

Table 1: Summary of the Potential Hosting Capacity Upgrade Available by Cost Cap, Mobilization Threshold, and Capacity Cost

Capacity Cost = \$100,000 / MW_{AC}			
	Mobilization Threshold		
Cost Cap	25%	50%	80%
\$5,000,000	66.7	100.0	250.0
\$25,000,000	333.3	500.0	1,250.0
\$100,000,000	1,333.0	2,000.0	5,000.0
Capacity Cost = \$300,000 / MW_{AC}			
	Mobilization Threshold		
Cost Cap	25%	50%	80%
\$5,000,000	22.2	33.3	83.3
\$25,000,000	111.1	166.7	416.7
\$100,000,000	444.3	666.7	1,666.7
Capacity Cost = \$600,000 / MW_{AC}			
	Mobilization Threshold		
Cost Cap	25%	50%	80%
\$5,000,000	11.1	16.7	41.7
\$25,000,000	55.5	83.3	208.3
\$100,000,000	222.2	333.3	833.3

A lower Mobilization Threshold reduces the time and administrative burden of leaving projects open to collect cost share fees. Notably, however, the Pro Rata cost does not change with the Mobilization Threshold, and therefore a lower mobilization percentage does not spare Reactive Cost Share Participants from the Pro Rata cost amount. All things being equal, a lower Mobilization Threshold will result in projects reaching construction quicker compared to a high Mobilization Threshold. However, as discussed previously, there will be far fewer projects that reach construction at a lower Mobilization Threshold compared to a high Mobilization Threshold.

Section J. also covers the situation where the Annual Ratepayer Cost Cap is reached. Subsection J.5 states:

Once the Annual Ratepayer Cost Cap is reached, the Mobilization Threshold for all pending Upgrades is set to 100 percent until the total amount recoverable from ratepayers drops below the cap. As available space opens up within the cost cap, projects transitioning back to the standard Mobilization Threshold shall follow existing prioritization processes.¹²

¹² *Id.*, at 13.

Subsection J.5 requires that the Mobilization Threshold be set to 100 percent once the Annual Ratepayer Cost Cap is reached, and therefore Reactive Cost Share Participants must pay 100 percent of the costs before construction can begin, once the Annual Ratepayer Cost Cap is reached. Finally, a lower Mobilization Threshold may be counter-productive to accelerate the creation of hosting capacity. For example, the Minnesota Distributed Energy Resources Interconnection Procedures (MN DIP) states:

Under the Traditional Security method, the Interconnection Customer shall provide reasonable adequate assurances of credit, including a letter of credit or personal guaranty of payment and performance from a creditworthy entity acceptable under the Area EPS Operator credit policy and procedures for the unpaid balance of the estimated amount shown in Interconnection Agreement for the totality of all anticipated work or expense incurred by the Area EPS Operator associated with the Interconnection Application. The payment for these estimated costs shall be as follows:

5.6.4.1.1 1/3 of estimated costs shall be due no later than when the Interconnection Customer signs the Interconnection Agreement.

5.6.4.1.2 An additional 1/3 of estimated costs shall be due prior to initial energization of the Generation System with the Area EPS Operator.

5.6.4.1.3 Remainder of actual costs, incurred by Area EPS Operator, shall be due within 30 days from the date the bill is mailed by the Area EPS Operator after project completion.¹³

If the Annual Ratepayer Cost Cap is reached, then two thirds of the required Reactive Cost Share Payment shall be outstanding before energization. The duration between construction and final payment could be years, particularly if the upgrades required involve substation equipment with multi-year lead times. While individual projects may reach construction sooner, when the Mobilization Window is combined with construction, it is likely that a higher Mobilization Threshold will deliver a larger amount of capacity. Therefore, a low Mobilization Threshold could have the opposite of the intended effect to speed up hosting capacity expansion because the total number of projects is significantly lower with a low Mobilization Threshold. Due to the favorable ratepayer protection and greater project funding available at the 80 percent Mobilization Threshold, the Department's preferred Mobilization Threshold is 80 percent.

The Department recommends the Commission adopt F.1.b.

¹³ In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established Under Minn. Stat. § 216B.161125-26, Distributed Energy Resources Interconnection Process (MN DIP) v.2.4, April 28, 2025, Docket No. E999/CI-16-521, (eDockets) [20254-218213-01](#), at 25-26.

A.7. Section G. Upgrade Prioritization

Section F. of the DSRUP covers the process by which projects are prioritized if there are more projects than available funding. There are no subsections that require a Commission decision in this section. The Department has no comments about this section.

A.8. Section H. Payment Details

Section H. of the DSRUP covers process of how payments are handled under the DSRUP. The Department recommends to disallow refunds of Reactive Cost Share payments once a project has reached construction. This section is a mandatory process that is required to implement the DSRUP. In addition, this section addresses Laws of Minn. 2024, ch. 126, art. 4, sec. 53(a)(6), which states the standards adopted by the Commission must be designed to:

allow trigger projects and any other distributed generation facilities to pay a utility more than the trigger project's or distributed generation facility's pro rata cost-share amount only if needed to meet the minimum threshold established in clause (5) and to receive refunds for amounts paid beyond the trigger project's or distributed generation facility's pro rata share of expansion costs from distributed generation projects that subsequently interconnect at the applicable location, after which pro rata payments are paid to the utility for distribution to ratepayers;

Subsections H.7, H.8 and H.9 address the statutory requirement.

There is one subsection that requires a Commission decision in this section. The subsection states:

The Commission must select 4 or 5.

4. Reactive Cost Share Participants may withdraw after all Interconnection Agreements for all Reactive Cost Share Participants that are participating in an Upgrade are countersigned by the Utility but shall not receive a refund of their Reactive Cost Share Contribution.

OR

5. Reactive Cost Share Participants are not allowed to withdraw after all Interconnection Agreements for all Reactive Cost Share Participants that are participating in an Upgrade are countersigned by the Utility and shall be assessed a penalty by the Utility if they do.

The Department supports the ability for Reactive Cost Share Participants to withdraw their application for interconnection that is contingent upon a yet unrealized mobilization threshold. There is the potential for mobilization windows to stay open for months or years, and Reactive Cost Share Participants should not be forced to pay for upgrades that may never materialize.

This decision subsection does not cover the aforementioned scenario. Instead, the decision relates to withdrawal from the DSRUP after mobilization has occurred. Subsectio E.6 of the DSRUP states that "Interconnection Agreements for Reactive Cost Share Participants shall not be tendered for signature

until after the Mobilization Threshold has been met and any applicable cluster studies have been completed.”¹⁴ Subsection E.9 and related subparts describe that once all interconnection agreements are signed and countersigned, the project shall update its status to “Cost Share Upgrade In Progress,” where design and construction begin.¹⁵ These requirements clearly outline that Reactive Cost Share Contributions will not be paid until the mobilization threshold has been met, which happens just before construction begins. Therefore, a withdrawal after the Mobilization Threshold has been met would constitute a violation of the Mobilization Threshold requirement, and adds additional risk that the Outstanding Costs will be rate based. Because Reactive Cost Share Participants are given ample time to withdraw before the Mobilization Threshold is reached, the Department concludes that it is inappropriate to allow a Reactive Cost Share Participant to receive any refund until the full cost of the upgrade has been recovered.

The Department recommends the Commission adopt H.4.

A.9. Section I. Payback Period

Section I. of the DSRUP covers how long Reactive Cost Share payments must be collected before the final outstanding costs are rate based. The Department recommends a ten-year payback period.

There are two subsections that require a Commission decision in this section. The first subsection states:

The Commission must choose one of the subpart of 1.

1. The Payback Period shall remain open once the Mobilization Threshold is reached and remains open for:

- a. A minimum of five years from the Upgrade’s in-service date
 - i. If at least 75% of the costs of the Reactive Distribution Upgrade have not been recovered after five years, the Payback Period is automatically extended by an additional three years.
- b. A minimum of ten years from the Upgrade’s in-service date.
- c. Until 100% of Upgrade costs are recovered from Interconnection Customers.
- d. No more than ten years from the Upgrade’s in-service date.¹⁶

The second subsection states:

The Commission must choose one of the subpart of 2.

2. The Payback Period shall end if:

¹⁴ *Id.* at 7.

¹⁵ *Ibid.*

¹⁶ *Id.* at 11-12.

- a. The Hosting [Capacity] created by the Upgrade is fully utilized by Reactive Cost Share Participants and all over-payers have been fully refunded the amounts above their Reactive Cost Share Contribution.
- b. The duration of the Payback Period defined in I.1 has elapsed.¹⁷

The first decision subsection pertains to the duration that Reactive Cost Share payments are collected. A longer Payback Period allowed for payments to be collected serves two purposes. First, a Payback Period allows for all Outstanding Costs to be recovered and thus avoids passing costs onto ratepayers. Second, a longer Payback Period prevents Reactive Cost Share Participants from attempting to game the system by waiting until the Payback Period has ended to receive the full benefit of the new capacity without payment. Conversely, a shorter Payback Period is less administratively burdensome for utilities to continue to track costs, and would give utilities additional opportunities to earn a return on the capitalized Outstanding Costs that are put into rates. While the Department is aware of the administrative burden of a longer payback period, the best balance between administrative burden and ratepayer protection is achieved with a payback period of at least ten years.

The Department recommends the Commission adopt I.1.b.

The second decision subsection pertains to when the Payback Period ends. Subpart 2.a would allow for the payback period to end after the upgrade is fully paid, and after all Reactive Cost Share Participants have been charged their final project cost. This subpart is a reasonable place to end a project that has been fully utilized. Subpart 2.b would allow for the Payback Period to end after the payback period selected in Subsection 1. This subpart would be utilized when a project has not recovered all of the Outstanding Costs, which means that the Outstanding Costs will be put into rates. Both of these subparts are complementary, because Subpart 2.a allows a project to end early if it is paid early, and Subpart 2.b allows a project to end in coordination with Subsection 1. Furthermore, neither subpart is fully comprehensive without the other, and thus both subparts are necessary.

The Department recommends the Commission adopt I.2.a and I.2.b.

A.10. Section J. Annual Ratepayer Cost Cap

Section J. of the DSRUP covers the maximum amount of ratepayer money that can be used to fund the DSRUP. The Department recommends that the threshold be set in tariff filings. This section addresses Laws of Minn. 2024, ch. 126, art. 4, sec. 53(a)(8), which states the standards adopted by the Commission must:

establish an annual limit or a formula for determining an annual limit for the total cost of upgrades that are not allocated to owners of participating

¹⁷ *Id.* at 12.

generation facilities and may be recovered from ratepayers under section 216B.16, subdivision 7b, clause (6).

Subsections J.1 and J.2 address the statutory requirement.

There is one subsection that requires a Commission decision in this section. The subsection states:

The Commission must choose either 1 or 2. If it chooses two, it must select either 2.a or 2.b.

1. The Commission shall decide the Annual Ratepayer Cost Cap for Utility in a tariff filing upon approval of that Utility's DSRUP.

OR

2. The Annual Ratepayer Cost Cap shall not exceed _____ % of the annual average of the

Utility's forecasted 5-year distribution capital budget from its most recent Integrated Distribution Plan.

a. 2 Percent

OR

b. 11 Percent; or a percent that will equal \$95 million for Xcel.¹⁸

The Department opposes flat budget percentages for several reasons. A flat percentage of costs between utilities, while well intentioned, will yield vastly different available budget amounts between utilities. For example, 2 percent of the Dakota Electric Association (DEA),¹⁹ Otter Tail Power' (OTP),²⁰ Minnesota Power (MP),²¹ and Xcel Energy (Xcel)²² distribution budgets would yield an Annual Ratepayer Cost Cap of \$347,520, \$467,726, \$1,578,400, and \$15,600,000, respectively. The available budgets for DEA and OTP may be so small that a reactive cost share budget could be almost meaningless, particularly if the Mobilization Threshold is set to a low percentage. Furthermore, when utilities like OTP incur large expenses, such as OTP did in 2023 and 2024 with a \$62 million grid modernization project, its budget could be temporarily inflated and allow for more funding over the 5-year average than is typical for the utility. If the 2023-2027 budget forecast was used instead of the 2025-2027 budget cited previously, then OTP's budget would increase to \$695,318, which is 49 percent

¹⁸ *Ibid.*

¹⁹ 2023-2027 estimated budget of \$17,376,000. *In the Matter of Distribution System Planning for Dakota Electric Association*, Dakota Electric Association, Integrated Distribution Plan, November 1, 2023, Docket No. E-111/CI-23-420, (eDockets) [202311-200124-01](#), at 127.

²⁰ 2025-2027 estimated budget of \$23,386,316 that excludes a large grid modernization project in 2023-2024. *In the Matter of the Distribution System Planning for Otter Tail Power Company*, Otter Tail Power Company, Integrated Distribution Plan, November 1, 2023, Docket No. E017/M-23-380, (eDockets) [202311-200138-02](#), at 38.

²¹ 2023-2027 estimated budget of \$78,920,000. *In the Matter of Minnesota Power's Integrated Distribution Plan*, Minnesota Power, Integrated Distribution Plan, November 1, 2023, Docket No. E015/M-23-258, (eDockets) [202310-199614-01](#), at 37.

²² 2023-2027 actual and estimated budget of \$780,000,000. *In the Matter of Xcel Energy's 2025 Integrated Distribution Plan*, Xcel Energy, Integrated Distribution Plan Preview Slides, August 19, 2025, Docket No. E002/M-25-142, (eDockets) [20259-223185-01](#), at 32.

higher than the 2025-2027 estimate. It is more important to set the Annual Ratepayer Cost Cap based on the actual grid need than to base the amount on a proportion of total costs. While DEA and OTP and similar budgets, the need for upgrades in DEA's territory is potentially much higher, because DEA is currently experiencing much higher levels of DER adoption than OTP. Instead, the Department supports considering the cost cap for each utility in a tariff filing where rate impacts of the proposed costs can be better evaluated.

The Department recommends the Commission adopt J.1.

A.11. Section K. Cost Recovery

Section K. of the DSRUP covers the cost recovery. The Department recommends that utilities collect carrying costs for the full project duration at the long-term cost of debt. This section addresses Laws of Minn. 2024, ch. 126, art. 4, sec. 53(a)(8), which states the DSRUP should:

establish an annual limit or a formula for determining an annual limit for the total cost of upgrades that are not allocated to owners of participating generation facilities and may be recovered from ratepayers under section 216B.16, subdivision 7b, clause (6).

Subsection K.5 addresses the statutory requirement referenced by the law, which pertains to Minn. Stat. 216B.16, Subd. 7b, paragraph (b), clause 6.

There are three subsections that require a Commission decision in this section. The first subsection states:

If the Commission chooses 1, it must also choose 2 or 3. If the Commission chooses 3, it must choose 3a or 3b. 3c is optional.

1. Outstanding costs will not be eligible for rate recovery for the first five years of the Payback Period. After five years, the remainder of the outstanding costs shall be eligible for cost recovery.

AND

2. The Utility will not accrue carrying costs during the first five years of the Payback Period.

OR

3. The utility will accrue carrying costs during the first five years of the Payback Period. The percentage rate for calculating carrying costs shall be the _____.

a. utility's authorized Weighted Average Cost of Capital from the most recently approved rate case

OR

b. utility's long-term cost of debt

c. Carrying costs shall not be capitalized. Carrying costs may be recovered through the Utility's Transmission Cost Recovery rider petition.²³

The second subsection states:

The Commission must choose at least one of the options under 5.

5. A Utility may petition to recover outstanding costs through any or all of the following (but without any double recovery):

- a. Through a general rate case.
- b. Through its Transmission Cost Recovery Rider pursuant to Minn. Stat. 216B.16, Subd. 7b, paragraph (b), clause 6.
- c. Through deferred accounting.
- d. Through invoices for DER projects.²⁴

The subsection states:

The Commission must choose 6a or 6b

6. All Reactive Cost Share Contributions collected from Reactive Cost Share Participants shall be collected during the Payback Period and shall be:

a) Returned to ratepayers as an offset to the revenue requirements of Reactive Cost Share Distribution Upgrade.

OR

b) Used to offset the rate base amount of the Upgrade until the upgraded assets are fully paid down, or the Payback Window closes.²⁵

The first subsection relates to how utilities can recover costs. If the DSRUP is successful, then utilities will never be required to recover program costs from ratepayers. In this scenario, utilities must still pay for the full cost of construction, which includes the Reactive Cost Share payments and the Outstanding costs. During the Payback Period, utilities will collect additional Reactive Cost Share payments until the project is fully paid for or reaches the end of the Payback Period. Per the Department's recommendation in Section I. Payback Period, up until costs are discharged, utilities may need to back the Outstanding Costs for a period of the construction timeline plus ten years. It is not reasonable to expect utilities to pay for these costs and not have any compensation for these expenditures. The Department is not aware of any situation in which utilities are asked to hold funding without any compensation. For this reason, the Department supports subsection K.3.

The rate of return under subsection K.3 must also be decided. By nature of the timing of three separate payments in the MN DIP, utilities are guaranteed to earn a return on the project because the utility

²³ Notice Attachment A at 13-14.

²⁴ *Id.*, at 14.

²⁵ *Ibid.*

must pay for project construction before the full Reactive Cost Share payment is received, even if the project has reached 100 percent mobilization. This payment is representative of the allowance for funds used during construction (AFUDC). AFUDC costs should be included in the project cost estimate, which passes on the construction carrying costs to Reactive Cost Share Participants.

After construction is complete, the DSRUP does not allocate carrying costs to Reactive Cost Share Participants, which is not covered in Section D., and would require additional language to add carrying costs to the Final Reactive Cost Share Contributions that references the variable carrying time. In practice, Reactive Cost Share Participants that interconnect after construction would have to pay more than their Pro Rata cost share amount to avoid ratepayers covering carrying costs. Instead, the Final Reactive Cost Share payment is based on only the final construction cost. Unless 100 percent of the DSRUP projects reach 100 percent mobilization by the end of construction, ratepayers will have to pay for the DSRUP through carrying charges.

The Department favors the lower carrying cost estimate for several reasons. If utilities earn the weighted average cost of capital (WACC) for carrying costs, then carrying costs equal rate-based costs. The difference in the final ratepayer cost is how quickly the asset is paid off and by whom. If none of the outstanding costs are paid for by Reactive Cost Share Participants, then total ratepayer costs would be higher because rate-based costs depreciate and thus lower the rate base, while carrying costs are fixed. Conversely, if a project is fully paid off before the Payback Period, then total ratepayer costs would be substantially lower because the accrual time for the WACC charged for carrying costs instead of rates is shorter, and the component of depreciation is offset by the Reactive Cost Share payments. If the DSRUP works as intended, then carrying costs are preferable to rates in every circumstance. However, ratepayer costs will increase substantially if Outstanding Costs are not paid for quickly. For example, a 4 percent return on a \$25 million Annual Ratepayer Cost Cap is \$1 million / yr. Because the DSRUP is a rolling program, it can be reasonably expected that some fraction of the Annual Ratepayer Cost Cap will be paid for by ratepayers every year. While it is possible for ratepayers to benefit from the DSRUP, it should not be assumed that the full value of the DSRUP will be passed onto ratepayers. Therefore, the cost impact to ratepayers should be kept to a minimum. In addition, if carrying costs are charged using the long-term cost of debt instead of the WACC, then even if none of the Outstanding Costs are paid during the Payback Period, ratepayers will be impacted significantly less for the failure of the DSRUP to pay for the full capacity created.

In addition to these considerations, the Department favors subsection K.1 to limit the impact of the DSRUP to customer rates. Subsection K.1 ensures that Outstanding Costs do not impact rates for the first five years after construction. If all costs are paid before this five-year period, then ratepayers will only bear, the carrying cost charge, and not the carrying cost plus outstanding costs charged to their rates.

The Department recommends the Commission adopt K.1. and K.3.b.

The subsection relates to the method of cost recovery. The Department prefers that utilities recover costs in a general rate case, because these costs are subject to a more detailed review for reasonableness. However, the Department recognizes the statutory requirement to allow for cost

recovery through the Transmission Cost Recovery rider, and also supports this option. There is no reason to allow for cost recovery by any other means, because the two methods of cost recovery are sufficient.

The Department recommends the Commission adopt K.5.a. and K.5.b.

The third subsection relates to how Reactive Cost Share Payments impact rates. It is preferable for Reactive Cost Share payments to be treated the same as a contribution in aid of construction (CIAC), which offsets the rate base, rather than revenue requirements. The offsetting of the rate base should occur when the costs payments are made and reduces the rate base earlier in the process resulting in overall lower rates. While an offset to the revenue requirement results in a longer carrying charge period and results in unnecessary higher costs for ratepayers. Also, when actual costs impact rates sooner, it represents less exposure of ratepayers to carrying costs and Outstanding Costs.

The Department recommends the Commission adopt K.6.b.

A.12. Section L. Cost Allocation

Section L. of the DSRUP covers cost allocation. The Department recommends cost allocation to the large commercial and industrial class whenever possible, as well as protections for under-resourced customers.

There is one subsection that requires a Commission decision in this section. The subsection states:

1 and 2 are alternatives. 3 can be adopted with either combination.

1. Costs recovered from ratepayers shall be treated consistent with the most recently approved rate case allocators and established revenue requirement procedures. Parties to a Utility's rate case or other cost recovery proceeding may request that the Commission establish a different cost allocation and procedures for DSRUP Upgrades.

OR

2. For Reactive Cost Share Distribution Upgrades primarily serving large commercial and/or industrial customers, Upgrades shall be tracked separately from other rate-base assets and costs not paid for by Cost Share Contributions shall be allocated to the large commercial and industrial classes contributing to the need for or benefiting from the Upgrade. For all Upgrades that do not primarily serve large commercial and/or industrial customers, costs will be allocated according to the most recently approved rate case allocators and revenue requirement procedures. Parties to a Utility's rate case may request that the Commission establish a different cost allocation and procedures for DSRUP Upgrades.

3. To the extent that DSRUP Upgrade costs are allocated to ratepayers, the Utility shall identify and mitigate adverse bill impacts on under-resourced customers and/or small businesses.²⁶

The Department prefers a cost allocation methodology that is cost causative, whenever practicable. If one customer class is the primary beneficiary of an upgrade, but costs are passed onto all customer classes equally, then the primary beneficiary will receive a subsidy from the other customer classes. The Department understands that it may be difficult, or impractical to delineate which customer classes benefit from each project. However, there are circumstances in which the large commercial and industrial customer classes could receive a disproportional benefit compared to other classes. The Department recommends that when it is possible to identify that a majority of load belongs to the large commercial and industrial class, that DSRUP fees be allocated to that class to the extent possible, to ensure a better matching of costs and benefits.

Similarly, the Department does not want DSRUP fees to be passed onto the most vulnerable ratepayers, who stand the least chance to benefit from the DSRUP. Therefore, the Department favors protection mechanisms for under-resourced customers and/or small businesses.

The Department recommends the Commission adopt L.2 and L.3.

A.13. Section M. Publication of DSRUP Information and Data

Section M. of the DSRUP covers how data is communicated about the DSRUP to the public in order to participate in the DSRUP. There are no subsections that require a Commission decision in this section. The Department has no comments about this section.

A.14. Section N. Reporting and Process Evaluation

Section N. of the DSRUP covers reporting and process evaluation. There are no subsections that require a Commission decision in this section. The Department has no comments about this section.

A.15. Section O. Dispute Resolution

Section O. of the DSRUP covers dispute resolution. There are no subsections that require a Commission decision in this section. The Department has no comments about this section.

A.16. Section P. Tariff Implementation

Section P. of the DSRUP covers reporting and process evaluation. There are no subsections that require a Commission decision in this section. The Department has no comments about this section.

²⁶ *Id.*, at 14-15.

B. DO THE DRAFT STANDARDS ADDRESS AND ACCOMPLISH THE GOALS AND REQUIREMENTS DESCRIBED IN THE MINNESOTA SESSION LAWS - 2024, REGULAR SESSION, CHAPTER 126—S.F.NO. 4292, ARTICLE 6, SECTION 53?

The Department's comments in the previous section cover the statutory compliance of Laws of Minn. 2024, ch. 126, art. 4, sec. 53(a)(3-8). The previous section does not address Laws of Minn. 2024, ch. 126, art. 4, sec. 53(a)(1) and (2), which states the DSRUP process should be designed to:

(1) accelerate the expansion of hosting capacity at multiple points on a utility's distribution system by ensuring that the cost of upgrades is shared fairly among owners of distributed generation projects seeking interconnection on a pro rata basis according to the amount of the expanded capacity utilized by each interconnected distributed generation facility;

(2) reduce the capital burden on owners of trigger projects seeking interconnection;

These first two sections relate to the general purpose of the DSRUP. Compared to the status quo, any implementation of the DSRUP accomplishes the first two goals of Laws of Minn. 2024, ch. 126, art. 4, sec. 53. The DSRUP allows for hosting capacity upgrade costs to be distributed amongst more than a single cost causer, which will have the effect of reducing the capital burden of trigger projects. The lower capital requirement will make uneconomic projects economical, which will accelerate the expansion of hosting capacity.

With these additional comments, the DSRUP accomplishes the goals and requirements as described in Laws of Minn. 2024, ch. 126, art. 4, sec. 53.

C. ARE THERE OTHER ISSUES OR CONCERNS RELATED TO THIS MATTER?

The Department has no additional comments.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the DSRUP and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. WHAT DRAFT GENERIC STANDARDS, OUTLINED IN ATTACHMENT A AND ATTACHMENT B SHOULD THE COMMISSION ADOPT FOR THE DSRUP? PLEASE PROVIDE A RATIONALE FOR WHY YOU SUPPORT, OPPOSE, OR TAKE NO POSITION ON CONTESTED SECTIONS OF THE STANDARDS.

- A.1. The Department recommends the Commission adopt C.2.a, F.1.b, H.4, I.1.b, I.2.a, I.2.b, J.1, K.1., K.3.b, K.5.a., K.5.b, K.6.b, L.2 and L.3.

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce
Comments

Docket No. E002, E015, E017/CI-24-288

Dated this **7th** day of **November 2025**

/s/Sharon Ferguson

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79	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	24-288Official 24-288
80	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	24-288Official 24-288
81	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	24-288Official 24-288
82	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	24-288Official 24-288
83	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	24-288Official 24-288
84	Sean	Gosiewski	sean@afors.org	Alliance for Sustainability		2801 21st Ave S Ste 100 Minneapolis MN, 55407 United States	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
85	Scott	Greenbert	scott@nautilussolar.com	Nautilus Solar Energy, LLC		396 Springfield Ave, Ste 2 Summit NJ, 07901 United States	Electronic Service		No	24-288Official 24-288
86	Sarah	Groebner	sgroebner@redwoodelectric.com	Redwood Electric Cooperative		60 Pine St Clements MN, 56224 United States	Electronic Service		No	24-288Official 24-288
87	Tim	Gross	tgross@fuelingmn.com	Fueling Minnesota		3244 Rice Street St. Paul MN, 55126 United States	Electronic Service		No	24-288Official 24-288
88	Cody	Gustafson	cgustafson@mnpower.com			null null, null United States	Electronic Service		No	24-288Official 24-288
89	Tom	Guttormson	tom.guttormson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd Ramsey MN, 55303 United States	Electronic Service		No	24-288Official 24-288
90	Natalie	Haberman	townsend@fresh-energy.org	Fresh Energy		408 St Peter St # 350 St. Paul MN, 55102 United States	Electronic Service		No	24-288Official 24-288
91	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	24-288Official 24-288
92	Joe	Halso	joe.halso@sierraclub.org	Sierra Club		1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	24-288Official 24-288
93	Donald	Hanson	dfhanson@ieee.org			P. O. Box 44579 Eden Prairie MN, 55344 United States	Electronic Service		No	24-288Official 24-288
94	John	Harlander	john.c.harlander@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	24-288Official 24-288
95	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	24-288Official 24-288
96	Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.		701 E. Cary Street Richmond VA, 23219 United States	Electronic Service		No	24-288Official 24-288
97	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	24-288Official 24-288
98	Tiana	Heger	thegeer@mnpower.com	Minnesota Power		30 W. Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-288Official 24-288
99	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-288Official 24-288
100	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN,	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101 United States				
101	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
102	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	24-288Official 24-288
103	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	24-288Official 24-288
104	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	24-288Official 24-288
105	Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	24-288Official 24-288
106	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-288Official 24-288
107	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	24-288Official 24-288
108	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	24-288Official 24-288
109	Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments		8100 Boone Blvd Suite 430 Vienna VA, 22182 United States	Electronic Service		No	24-288Official 24-288
110	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	24-288Official 24-288
111	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	24-288Official 24-288
112	Robert	Jagusch	rjagusch@mmua.org	MMUA		3025 Harbor Lane N Minneapolis MN, 55447 United States	Electronic Service		No	24-288Official 24-288
113	Chris	Jarosch	chris@carrcreekelectricservice.com	Carr Creek Electric Service, LLC		209 Sommers Street North Hudson WI, 54016 United States	Electronic Service		No	24-288Official 24-288
114	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-288Official 24-288
115	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street	Electronic Service		No	24-288Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
129	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
130	Tom	Key	tkey@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	24-288Official 24-288
131	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	24-288Official 24-288
132	Jack	Kluempke	jack.kluempke@state.mn.us		Department of Commerce	85 7th Place East Suite 600 St. Paul MN, 55101 United States	Electronic Service		No	24-288Official 24-288
133	Aaron	Knoll	aknoll@greeneespel.com	Greene Espel PLLP		222 South Ninth Street Suite 2200 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
134	Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power		1725 US Hwy 12 E Litchfield MN, 55355 United States	Electronic Service		No	24-288Official 24-288
135	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	24-288Official 24-288
136	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	24-288Official 24-288
137	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
138	Corrina	Kumpe	ckumpe@mysunshare.com			null null, null United States	Electronic Service		No	24-288Official 24-288
139	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-288Official 24-288
140	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
141	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	24-288Official 24-288
142	Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar		3209 W. 76th St #305 Edina MN, 55435 United States	Electronic Service		No	24-288Official 24-288
143	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN,	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55391 United States				
144	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	24-288Official 24-288
145	Benjamin	Levine	blevine@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-288Official 24-288
146	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	24-288Official 24-288
147	Carl	Linvill	clinvill@raponline.org			50 State Street Suite #3 Montpelier VT, 05602 United States	Electronic Service		No	24-288Official 24-288
148	Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products		PO Box 108 Springfield MN, 56087 United States	Electronic Service		No	24-288Official 24-288
149	Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy		414 Nicillet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	24-288Official 24-288
150	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-288Official 24-288
151	Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.		PO Box 1156 Latham NY, 12110-1156 United States	Electronic Service		No	24-288Official 24-288
152	Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.		10710 Town Square Dr NE Ste 201 Minneapolis MN, 55449 United States	Electronic Service		No	24-288Official 24-288
153	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	24-288Official 24-288
154	Alex	Magerko	amagerko@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	24-288Official 24-288
155	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-288Official 24-288
156	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	24-288Official 24-288
157	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55401 United States				
158	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	24-288Official 24-288
159	Jason	Maur	jason.maur@renesolapower.com	Renesola Power Holdings, LLC		850 Canal Street 3rd Floor Stamford CT, 06902 United States	Electronic Service		No	24-288Official 24-288
160	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	24-288Official 24-288
161	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	24-288Official 24-288
162	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	24-288Official 24-288
163	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	24-288Official 24-288
164	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	24-288Official 24-288
165	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	24-288Official 24-288
166	Michael	Menzel	mike.m@sagiliti.com	Sagiliti		23505 Smithtown Rd. Suite 280 Excelsior MN, 55331 United States	Electronic Service		No	24-288Official 24-288
167	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	24-288Official 24-288
168	Pontius	Mike	mpontius@mnpower.com			null null, null United States	Electronic Service		No	24-288Official 24-288
169	Brian	Millberg	fwengineering@comcast.net			695 Grand Ave #222 Saint Paul MN, 55105 United States	Electronic Service		No	24-288Official 24-288
170	Luther	Miller	luther.c.miller@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	24-288Official 24-288
171	Marc	Miller	mmiller@soltage.com	Soltage, LLC		66 York Street, 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
172	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	24-288Official 24-288
173	Marcus	Mills	marcus@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	24-288Official 24-288
174	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	24-288Official 24-288
175	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24-288Official 24-288
176	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	24-288Official 24-288
177	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
178	Susan	Mudd	smudd@elpc.org	Environmental Law and Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	24-288Official 24-288
179	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	24-288Official 24-288
180	Alex	Nelson	anelson@dakotaelectric.com	Dakota Electric Association		4300 220nd St Farmington MN, 55024 United States	Electronic Service		No	24-288Official 24-288
181	Anthony	Nelson	amnelson@otpc.com	Ottertail Power		53233 Sunrise Ln Park Rapids MN, 56470 United States	Electronic Service		No	24-288Official 24-288
182	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	24-288Official 24-288
183	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-288Official 24-288
184	Darin	Nelson	dnelson@minnetonkamn.gov	City of Minnetonka		14600 Minnetonka Blvd Minnetonka MN, 55345 United States	Electronic Service		No	24-288Official 24-288
185	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
186	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
187	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	24-288Official 24-288
188	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	24-288Official 24-288
189	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	24-288Official 24-288
190	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	24-288Official 24-288
191	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	24-288Official 24-288
192	Patty	O'Keefe	patty.okeefe@sierraclub.org			2525 Emerson Ave S Apt 2 Minneapolis MN, 55405 United States	Electronic Service		No	24-288Official 24-288
193	Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc		P.O. Box 639 Tyler MN, 56178-0639 United States	Electronic Service		No	24-288Official 24-288
194	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	24-288Official 24-288
195	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-288Official 24-288
196	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	24-288Official 24-288
197	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Fergus Falls MN, 56537 United States	Electronic Service		No	24-288Official 24-288
198	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-288Official 24-288
199	Bethany	Owen	bowen@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-288Official 24-288
200	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	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
201	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	24-288Official 24-288
202	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	24-288Official 24-288
203	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	24-288Official 24-288
204	Susan	Peirce	susan.peirce@state.mn.us		Department of Commerce	85 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	24-288Official 24-288
205	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	24-288Official 24-288
206	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-288Official 24-288
207	Wess	Pfaff	wes.pfaff@mrenergy.com			null null, null United States	Electronic Service		No	24-288Official 24-288
208	Morgan	Pitz	morgan.pitz@us-solar.com	US Solar		100 N 6th St #410B Minneapolis MN, 55403 United States	Electronic Service		No	24-288Official 24-288
209	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	24-288Official 24-288
210	Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel		null null, null United States	Electronic Service		No	24-288Official 24-288
211	Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now		null null, null United States	Electronic Service		No	24-288Official 24-288
212	Paula	Prahl	paula.prahl@dominiuminc.com	Dominium		2905 Northwest Blvd Ste 150 Plymouth MN, 55441 United States	Electronic Service		No	24-288Official 24-288
213	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-288Official 24-288
214	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	24-288Official 24-288
215	Elizabeth	Psihos	elizabeth.psihos@idealenergies.com			null null, null United States	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
216	Bridget	Rathsack	bridget.rathsack@burnsvillemn.gov	City of Burnsville, MN		100 Civic Center Parkway Burnsville MN, 55337 United States	Electronic Service		No	24-288Official 24-288
217	Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC		3363 Republic Ave Saint Louis Park MN, 55426 United States	Electronic Service		No	24-288Official 24-288
218	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-288Official 24-288
219	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	24-288Official 24-288
220	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	24-288Official 24-288
221	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	24-288Official 24-288
222	Micah	Revell	micah.revell@stinson.com	Stinson LLP		50 South Sixth St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
223	Michael	Riewer	mriewer@otpc.com	Otter Tail Power Company		PO Box 4496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	24-288Official 24-288
224	Jonathan	Roberts	jroberts@soltage.com	Soltage		66 York St 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	24-288Official 24-288
225	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	24-288Official 24-288
226	Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC		1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	24-288Official 24-288
227	Daniel	Rogers	dan@nokomispartners.com			2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	24-288Official 24-288
228	Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	24-288Official 24-288
229	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	24-288Official 24-288
230	Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electrical Association		PO Box 529 24386 State Highway 4	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Sleepy Eye MN, 56085 United States				
231	Delaney	Russell	delaney@mnipl.org	Just Solar Coalition		4407 E Lake Street Minneapolis MN, 55407 United States	Electronic Service		No	24-288Official 24-288
232	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	24-288Official 24-288
233	Ian	SantosMeeker	ians@ips-solar.com	IPS Solar		null null, null United States	Electronic Service		No	24-288Official 24-288
234	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
235	Kenric	Scheevel	kjs@dairynet.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602 United States	Electronic Service		No	24-288Official 24-288
236	Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	24-288Official 24-288
237	Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	24-288Official 24-288
238	Jeff	Schoenecker	jschoenecker@dakotaelectric.com	Dakota Electric Association		4300 220th Street W Farmington MN, 55024 United States	Electronic Service		No	24-288Official 24-288
239	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	24-288Official 24-288
240	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	24-288Official 24-288
241	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-288Official 24-288
242	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	24-288Official 24-288
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244	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	24-288Official 24-288
245	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	24-288Official 24-288

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247	Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC		233 Park Ave S Ste 201 Minneapolis MN, 55415 United States	Electronic Service		No	24-288Official 24-288
248	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	24-288Official 24-288
249	Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power		1725 US Highway 12 E Suite 100 Litchfield MN, 55355 United States	Electronic Service		No	24-288Official 24-288
250	Glen	Skarbakka	glen@s-pllc.com	Skarbakka PLLC		5411 Bartlett Blvd Mound MN, 55364 United States	Electronic Service		No	24-288Official 24-288
251	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	24-288Official 24-288
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253	Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	24-288Official 24-288
254	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-288Official 24-288
255	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
256	Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy		800 LaSalle Avenue P.O. Box 59038 Minneapolis MN, 55459-0038 United States	Electronic Service		No	24-288Official 24-288
257	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-288Official 24-288
258	Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Association		24386 State Hwy. 4, PO Box 529 Sleepy Eye MN, 56085 United States	Electronic Service		No	24-288Official 24-288
259	Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies		5810 Nicollet Ave Minneapolis MN, 55419 United States	Electronic Service		No	24-288Official 24-288

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260	Karl	Sonneman	karl17@hbc.com	Law Office of Karl W. Sonneman		111 Riverfront Suite 202 Winona MN, 55987 United States	Electronic Service		No	24-288Official 24-288
261	Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy		401 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	24-288Official 24-288
262	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	24-288Official 24-288
263	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 United States	Electronic Service		No	24-288Official 24-288
264	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
265	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
266	Lindsey	Stegall	lindsey.stegall@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	24-288Official 24-288
267	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-288Official 24-288
268	Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric		22636 US Highway 59 PO Box 788 Worthington MN, 56187 United States	Electronic Service		No	24-288Official 24-288
269	Bryant	Tauer	btauer@whe.org	Wright-Hennepin		6800 Electric Dr Rockford MN, 55373 United States	Electronic Service		No	24-288Official 24-288
270	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	24-288Official 24-288
271	Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light		null null, null United States	Electronic Service		No	24-288Official 24-288
272	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	24-288Official 24-288
273	Taige	Tople	taige.d.tople@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-288Official 24-288

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274	Jason	Topp	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
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277	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	24-288Official 24-288
278	Jeff	Triplett	triplettj@powersystem.org	MREA		10710 Town Square Dr NW St 201 Minneapolis MN, 55449 United States	Electronic Service		No	24-288Official 24-288
279	Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric		22636 US Hwy. 59 P.O. Box 788 Worthington MN, 56187-0788 United States	Electronic Service		No	24-288Official 24-288
280	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	24-288Official 24-288
281	Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	24-288Official 24-288
282	Gary	Van Winkle	gvanwinkle@mylegalaid.org	Mid-Minnesota Legal Aid		111 N Fifth St Ste 100 Minneapolis MN, 55403 United States	Electronic Service		No	24-288Official 24-288
283	John	Vaughn	nik@rreal.org	Rural Renewable Energy Alliance		3963 8th Street SW Backus MN, 55435 United States	Electronic Service		No	24-288Official 24-288
284	Ellen	Veazey	lveazey@solarunitedneighbors.org	Solar United Neighbors		1350 Connecticut Ave NW Ste 412 Washington DC, 20036 United States	Electronic Service		No	24-288Official 24-288
285	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	24-288Official 24-288
286	Curt	Volkman	curt@newenergy-advisors.com	Fresh Energy		408 St Peter St Saint Paul MN, 55102 United States	Electronic Service		No	24-288Official 24-288
287	Wendy	Vorasane	wendy.vorasane@idealenergies.com			null null, null United States	Electronic Service		No	24-288Official 24-288
288	Robert J.V.	Vose	rvose@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288

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289	Stacy	Wahlund	swahlund@otpc.com	Otter Tail Power Company		215 S. Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	24-288Official 24-288
290	Sarah	Walinga	swalinga@solarcity.com	Energy Freedom Coalition		3055 Clearview Way San Mateo MN, 94402 United States	Electronic Service		No	24-288Official 24-288
291	Kevin	Walker	kwalker@beaconinterfaith.org	Beacon Interfaith Housing Collaborative		null null, null United States	Electronic Service		No	24-288Official 24-288
292	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	24-288Official 24-288
293	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	24-288Official 24-288
294	Samantha	Weaver	samantha@communitysolaraccess.org	Coalition for Community Solar Access		1380 Monroe St. Washington DC DC, 20010 United States	Electronic Service		No	24-288Official 24-288
295	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	24-288Official 24-288
296	Joshua	Williams	joshua@highlandfleets.com	Highland Electric Fleets		200 Cummings Center Suite 273-D Beverly MA, 01915 United States	Electronic Service		No	24-288Official 24-288
297	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	24-288Official 24-288
298	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	24-288Official 24-288
299	Anthony	Willingham	anthony.willingham@electrifyamerica.com	Electrify America		1950 Opportunity Way Suite 1500 Reston VA, 20190 United States	Electronic Service		No	24-288Official 24-288
300	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	24-288Official 24-288
301	Heidi	Winter	hwinter@co.murray.mn.us	Murray County		2500 28th Street PO Box 57 Slayton MN, 56172 United States	Electronic Service		No	24-288Official 24-288
302	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids	Electronic Service		No	24-288Official 24-288

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303	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	24-288Official 24-288
304	Curtis	Zaun	curtis@cpzlaw.com			3254 Rice Street Little Canada MN, 55126 United States	Electronic Service		No	24-288Official 24-288
305	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-8920 United States	Electronic Service		No	24-288Official 24-288
306	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188-1022 United States	Electronic Service		No	24-288Official 24-288
307	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-288Official 24-288
308	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	24-288Official 24-288