



March 8, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 250
St. Paul, MN 55101

VIA E-FILING

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

PUC Docket Number: E-002/M-21-695

Dear Mr. Seuffert:

Enclosed please find the Comments of the Energy CENTS Coalition in the above-referenced matter(s). An Affidavit of Service is also enclosed.

If you have any questions, please call me at (651) 245-1644 or contact me via electronic mail at george@energycents.org.

Thank you for your consideration.

Sincerely,
George Wm Shardlow

George Shardlow
Executive Director
Energy CENTS Coalition

**State of Minnesota
Before the Public Utilities Commission**

| | |
|-----------------|--------------|
| Katie Sieben | Chair |
| Hwikwon Ham | Commissioner |
| Valerie Means | Commissioner |
| Joseph Sullivan | Commissioner |
| John Tuma | Commissioner |

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

Docket No. E-002/M-21-695

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

Docket No. E-002/M-13-867

Comments of the Energy CENTS Coalition

I. INTRODUCTION

The Energy CENTS Coalition (“ECC”) appreciates the opportunity to submit comments in response to Xcel Energy’s (“Xcel” or “the Company”) compliance filing in the above-referenced matter. As discussed further below, ECC respectfully recommends the Commission approve the Company’s compliance filing and adopt the proposed changes to the PowerON program participant bills.

ECC also appreciates the Company’s *In Care Of Billing* (“In C/O Billing”) proposal to help tenants maintain their status as an Xcel customer of record. In these comments, ECC will discuss the limitations associated with In C/O Billing and respectfully recommend the Commission adopt changes to the Company’s proposal. As discussed further below, absent changes to the Company’s Solar*Rewards Community (“S*RC” or “CSG”) tariff, ECC does not believe that In C/O Billing is sufficient to ensure that tenants will retain regulated utility consumer protections. With the proposed modifications, ECC recommends the Commission approve the Company’s In C/O Billing proposal. ECC further recommends the Commission require Xcel to file the S*RC tariff changes and to establish the effective date of those changes within 30 days of the Commission’s Order in this matter.

II. BACKGROUND

On September 23, 2021, ECC joined, with Mid-Minnesota Legal Aid, and the Citizens Utility Board of Minnesota, Xcel Energy’s Petition to revise the Company’s CSG tariffs and to provide additional CSG consumer protections for tenants living in building subscribed CSGs.¹

On June 24, 2022, the Commission rejected the petition and ordered Xcel to convene a stakeholder group and propose tariff changes to allow tenants subject to utility cost re-billing and building CSGs to maintain eligibility for Xcel Energy’s affordability programs, including PowerON.² ECC participated in the stakeholder meetings and, after raising numerous logistical issues, argued that the only feasible way for Xcel to ensure tenant eligibility for the Company’s affordability programs was for all tenants to keep (or regain) their status as an Xcel Energy customer. ECC maintains that position today.

On November 11, 2022, Xcel filed a compliance filing, summarizing the stakeholder process and proposing changes to its Standard Contract for the S*RC tariff requiring landlords to allow tenants to “opt-out” of CSG participation and to provide tenants with information sufficient to voluntarily “opt-in” to a building CSG and utility re-billing arrangement.³

On August 11, 2023, the Commission issued an Order stating, “the Commission concurs that Xcel’s proposed edits to its contract are largely reasonable in clarifying tenants’ options for opting in or out of a CSG”⁴ and adopted the inclusion of the opt-out/opt-in language proposed by Xcel in the Company’s November 14 (*sic November 11*) 2022 compliance filing. In Order Point 3 of the August 11, 2023 Order, the Commission required Xcel to:

work with the Department of Commerce’s Energy Development Office on programmatic improvements to its billing system to accomplish the goals of Community Solar Garden legislation passed in the 2023 legislative session, and the goals previously set forth in ordering paragraph 2B of the Commission’s June 24, 2022, Order. Before implementing changes, Xcel shall report back to the Commission no later than January 15, 2024 on details, including but not limited to: the necessary changes to its billing system, the incremental costs thereof, an analysis of what data sharing requirements will be necessary, and the estimated number of tenants/households that would benefit.⁵

¹ IN THE MATTER OF XCEL ENERGY’S TARIFF REVISIONS UPDATING COMMUNITY SOLAR GARDEN TARIFF PROVIDING ADDITIONAL CUSTOMER PROTECTIONS IN SUBSCRIPTION ELIGIBILITY, DOCKET NOS.

E-002/M-21-695/DOCKET NO. E-002/M-13-867, September 23, 2021.

² ORDER PT 2(b), ORDER DENYING PETITION, ADDRESSING LOW-INCOME ENERGY ASSISTANCE PROGRAMS, AND REQUIRING FURTHER PROCEEDINGS, DOCKET NOS. E-002/M-21-695/DOCKET NO. E-002/M-13-867, June 24, 2022.

³ COMPLIANCE FILING PROPOSED COMMUNITY SOLAR GARDEN PROGRAM AND TARIFF REVISIONS UPDATING COMMUNITY SOLAR GARDEN TARIFF PROVIDING ADDITIONAL CUSTOMER PROTECTIONS IN SUBSCRIPTION ELIGIBILITY, DOCKET NOS. E002/M-13-867 & E002/M-21-695, November 11, 2022.

⁴ ORDER APPROVING COMPLIANCE FILING AND PROPOSED CONTRACT AND TARIFF REVISIONS, DOCKET NOS. E-002/M-21-695/DOCKET NO. E-002/M-13-867, August 11, 2023.

⁵ *Id.* at ORDER PT 3.

On January 16, 2024, Xcel Energy submitted a filing to comply with the Commission’s August 11, 2023 Order.⁶

III. TOPIC COMMENTS

- A. Does Xcel Energy’s January 16, 2024 compliance filing meet the requirements of the Commission’s August 11, 2023 Order?

ECC believes the Company’s compliance filing meets the requirements of the Commission’s August 11, 2023 Order and respectfully requests the Commission approve the filing.

The Company’s compliance filing details proposed billing enhancements that would show the required PowerON payment to enrolled participants. The filing also proposes an In C/O Billing program, which the Company asserts: “is a solution that... allows [tenants] to protect their enrolled status in our Affordability Programs by maintaining their name on the bills.”⁷ As described below, ECC welcomes the changes to PowerON billing program but is concerned that the In C/O Billing program, as proposed, does not adequately protect the legal and financial interests of low-income tenants living in CSG-subscribed buildings.

1. PowerON billing changes

ECC is the third-party administrator for Xcel Energy’s PowerON, Gas Affordability, and Medical Assistance Programs. In that role, ECC establishes PowerON participant affordability payment amounts by determining a monthly credit (the difference between participant actual electric bills and three percent of household income). To date, the required monthly affordable payment amount has **not** been included on the participant’s Xcel Energy electric bill so ECC sends participants a “budget letter” instructing PowerON customers to pay only the affordable payment amount rather than the “Please Pay” amount on their actual Xcel bill. Many of the inquiries ECC receives about PowerON include explaining the difference between these two amounts and assuring participants that they only need to pay their monthly PowerON required payment and to ignore the actual amount on their Xcel Energy bill.

We agree that the Company’s process to replace the customer’s total amount due under the “Please Pay” field with the PowerON budget amount will “provide customer clarity...by reflecting the adjusted amount due...after the customer’s PowerON credit adjustment has been calculated and applied.”⁸ ECC believes the Company’s proposal to include the PowerON affordable payment amount (the difference between the actual bill and the amount owed after the PowerON credit is applied) will reduce confusion about how much participants are required to pay, decrease customer inquiries to ECC about payment amounts, and may increase program retention rates.

⁶ COMPLIANCE FILING-BILLING SYSTEM CHANGES & INCREMENTAL COSTS PROPOSED COMMUNITY SOLAR GARDEN PROGRAM AND TARIFF REVISIONS UPDATING COMMUNITY SOLAR GARDEN TARIFF PROVIDING ADDITIONAL CUSTOMER PROTECTIONS IN SUBSCRIPTION ELIGIBILITY DOCKET NO. E002/M-13-867 & E002/M-21-695, January 16, 2024.

⁷ COMPLIANCE FILING-BILLING SYSTEM CHANGES & INCREMENTAL COSTS PROPOSED COMMUNITY SOLAR GARDEN PROGRAM AND TARIFF REVISIONS UPDATING COMMUNITY SOLAR GARDEN TARIFF PROVIDING ADDITIONAL CUSTOMER PROTECTIONS IN SUBSCRIPTION ELIGIBILITY DOCKET NO. E002/M-13-867 & E002/M-21-695, January 16, 2024, PAGE 5.

⁸ *Id.*, PAGE 4.

Because the PowerON affordable payment amount will now appear on the Xcel bill, landlords who re-bill their tenants for electric service can see which tenants are participating in PowerON and that they are only required to pay the affordable payment amount rather than the full amount of the actual bill. Without this change, landlords could only see the actual “Please Pay” amount and would require tenants to pay that higher amount.

Even with this billing improvement, ECC believes questions remain about Xcel Energy’s ability to provide PowerON reporting information. For example, PowerON program terms require Xcel to remove participants if they miss two consecutive months’ payments. Xcel will not know if a tenant missed payments to a landlord. Similarly, Xcel is required to report PowerON participant payments but, when tenants are re-billed for electric service, Xcel will not know that tenants made a payment.

Nonetheless, given the participation growth in the PowerON program, and the fact that this change will benefit all program participants, ECC believes the benefit of this change outweighs the reporting issues it presents and supports this change.

2. *In Care Of Billing Discussion*

Currently, Xcel Energy’s affordability programs are available to Xcel customers that receive a LIHEAP grant. The LIHEAP grant amount is paid to Xcel Energy as a State-recognized LIHEAP vendor. Xcel targets affordability program (e.g. PowerON) outreach efforts to their LIHEAP customers. Xcel also applies the monthly low-income discount to eligible LIHEAP customer accounts (retroactively to Oct 1st each year). These programs are governed by Minnesota statute, requiring Xcel to determine program eligibility based on *receipt of LIHEAP*.⁹

Xcel’s In C/O Billing proposal attempts to extend the benefits of the Company’s affordability programs to tenants living in CSG buildings where the tenant is no longer the Xcel customer of record. In the August 11, 2023 Order, the Commission summarized the problem Xcel was requested to solve, stating:

Under the rules for various energy assistance programs, only people on record as Xcel customers qualify for participation, but under the Company’s CSG program, some landlords enroll in the CSG program, but in doing so, the landlord becomes the Xcel customer of record, causing the tenant’s name to be removed, thereby jeopardizing a low-income renter’s access to affordability programs.¹⁰

The Commission subsequently required Xcel Energy to “propose a modification to its tariffs for these [affordability] programs to allow low-income renters who are subject to third-party billing to access these programs.”¹¹

As proposed, ECC does not believe the Company’s In C/O Billing proposal is adequate to ensure tenants who are re-billed for electric service retain access to their Xcel Energy account, eligibility for Xcel’s

⁹ Minn. Stats. § 216B.16 (subds. 14 and 15).

¹⁰ ORDER APPROVING COMPLIANCE FILING AND PROPOSED CONTRACT AND TARIFF REVISIONS, DOCKET NO. E-002/M-21-695/DOCKET NO. E-002/M-13-867, August 11, 2023, pp. 2-3.

¹¹ ORDER PT 2(b), ORDER DENYING PETITION, ADDRESSING LOW-INCOME ENERGY ASSISTANCE PROGRAMS, AND REQUIRING FURTHER PROCEEDINGS, DOCKET NOs. E-002/M-21-695/DOCKET NO. E-002/M-13-867, June 24, 2022.

affordability programs, and protection under the Cold Weather Rule (CWR). Fundamentally, ECC is concerned that, without modifications, tenants will not even be aware that they can choose the In C/O Billing option. These concerns are discussed further below.

a. Customer awareness

For several reasons, ECC is concerned about tenants who lose their status as the Xcel Energy customer of record and become an In C/O Billing customer.

First, it is unclear what, if any, notification tenants will receive to alert them to the fact that they are still an Xcel customer. Second, the Company's proposal does not identify *who* is responsible for communicating the In C/O Billing option to tenants. Third, because tenants will not receive a hard copy of their monthly Xcel bill, it is reasonable to assume that many tenants will conclude that they are no longer an Xcel customer. Fourth, the Company's proposal does not include any information regarding the benefits to tenants associated with the election of this option. Finally, in the absence of any communication, ECC does not expect tenants will understand that they retain an Xcel Energy account and that they, by extension, remain eligible for the Company's affordability programs.

b. Financial Harm

If, under In C/O billing, tenants do not understand that they remain Xcel's customers, they will also not understand they remain eligible for the Company's affordability programs. In that case, low-income tenants will potentially lose the \$15/month low-income discount credit or the \$100.57 average monthly PowerON credit amounts. Nearly 70% (68%) of PowerON participants live on an average annual income at or below the federal poverty level and experience 13% electric energy burdens. Participation in PowerON lowers their energy burden to 3% of household income.¹²

c. LIHEAP participation

When low-income tenants who are Xcel Energy customers receive a LIHEAP grant, the LIHEAP funds are applied to their Xcel Energy account. Given the limitations of the In C/O Billing communication described above, a tenant who does not understand that they can retain their Xcel account may apply for LIHEAP using the re-billed statement issued by the landlord's third-party billing agent. Because some of these billing agents are also approved LIHEAP vendors, the tenant's LIHEAP grant would be paid to the billing agent. In this case, Xcel would not have knowledge of that LIHEAP payment and, because receipt of LIHEAP is required for the Company's affordability programs, these tenants would lose access to those programs.

¹² Energy CENTS Coalition Comments, In the Matter of a Petition for Approval of a Modification to Low-Income Discount Program and In the Matter of a Petition for Approval of Low Income Energy Discount Rider Funding, Docket Nos. E-002/M-04-1956/ Docket No. E-002/M-10-854.

d. Cold Weather Rule Protection

The In C/O Billing will not extend Cold Weather Rule (“CWR”) protections to low-income tenants. Under current statute and company practice, a low-income customer can call Xcel and verbally negotiate an agreement to limit their utility bill to 10% of their household income during the heating season. This verbal agreement amount, however, is not reflected on the monthly Xcel Energy bill. Therefore, under the In C/O billing proposal, landlords will receive a tenant’s Xcel bill with a “Please Pay” amount for the full bill rather than the negotiated CWR payment amount. As a result, landlords will re-bill low-income tenants amounts that do not comply with CWR statute.

e. Reliance on internet access

Under the Company’s proposed In C/O Billing program, Xcel would send the hard copy of the tenant’s monthly Xcel Energy bill to the landlord’s re-billing agent while the tenant could still access their billing statements. However, under this proposal, tenants will not receive a mailed copy of their monthly bill and would only be able to access billing statements through the Company’s online (“My Account”) portal.

As noted above, nearly 70% of the current 23,000 Xcel customers enrolled in PowerON live on annual incomes below 100% of the federal poverty level (with average incomes of \$12,109). These customers are least likely to be able to pay for internet service. This concern goes beyond anecdotal. As the third-party implementer of the PowerON Program, ECC receives over 50 program applications *per week* by fax. This practical experience attests to the fact that it is not safe to assume that all eligible program participants would maintain “access” to their Xcel Energy accounts, if that access is limited to internet access.

IV. ECC’s recommended modifications to the Company’s In Care of Billing Proposal

If the Commission seeks to promote low-income tenants’ access to CSG while maintaining their eligibility for the Company’s affordability programs, the easiest and most transparent method has already been established. The Commission approved Xcel Energy’s S*RC tariff, allowing tenants in building-subscribed CSGs to opt-out of the garden and retain their status as the Xcel Energy customer of record. In its August 11, 2023 Order, the Commission approved a modification to the Company’s S*RC tariff, stating “the Commission concurs that Xcel’s proposed edits to its contract are largely reasonable in clarifying tenants’ options for opting in *or out of a CSG* (emphasis added).”¹³ The approved tariff states:

In any situation where the Landlord has a Subscription associated with a tenant occupied premise that has its own meter, the Landlord and Community Solar Garden Operator must allow the tenant to Opt-Out of this arrangement at any time upon request. Where a tenant Opts-Out, the tenant shall not be charged any fee by the Landlord or the Community Solar

¹³ ORDER APPROVING COMPLIANCE FILING AND PROPOSED CONTRACT AND TARIFF REVISIONS, DOCKET NO. E-002/M-21-695/DOCKET NO. E-002/M-13-867, August 11, 2023.

Garden Operator for Opting out, nor any fee for the tenant to reinstate or become the named customer on the Company account.¹⁴

The tariff also requires landlords to “provide each tenant the process to Opt-out of the Community Solar Garden associated with the meter serving the tenant’s unit.”¹⁵ Under the approved opt-out provisions, the tenant remains the customer of record and will continue to receive a paper bill and remain eligible for the Company’s affordability programs and CWR protection.

If a tenant opts-out of a CSG building subscription, the tenant can then avail themselves of opportunities to join a different solar garden as an individual subscriber. Rather than remaining in the legally ambiguous status of being the tenant of a CSG subscriber, tenants who opt-out of a building CSG and subscribe independently to a different garden maintain access to affordability programs as the customer of record with Xcel *and* enjoy the legal protections afforded to subscribers in Chapter 216B.1641.

The Commission also approved the tariff requirement that landlords can subscribe tenants to a building CSG only with a tenant’s voluntary permission. The opt-in provision of the tariff states:

Where the Landlord seeks to have a new Subscription associated with a tenant occupied premise or seeks to continue a Subscription where there is a new tenant, the Landlord can only do so after the tenant has voluntarily signed the Opt-In Consent Form set forth in Attachment A to this Addendum.¹⁶

Attachment A of the tariff’s Addendum states, by signing the opt-in form, tenants understand they:

*will no longer have an Xcel Energy account ... [consent to rebilled electric charges, and] will no longer be eligible for any Xcel Energy Affordability Programs (PowerOn, Medical Assistance Program, Senior Low Income Discount) or will not have protection by the Minnesota Public Utilities Commission under laws governing payment plans, budget billing and payment plan offerings, including medically necessary equipment and Cold Weather Rule protections (emphasis added).*¹⁷

As proposed, ECC believes the Company’s In C/O Billing proposal contradicts the Company’s current S*RC tariff because the current opt-in tariff language declares tenants will be **ineligible** for Xcel’s affordability programs while the inherent objective of the In C/O billing proposal is to ensure that re-billed Xcel customers **remain eligible** for these programs and protections. ECC also believes that the tariff language would have to include an In C/O Billing form to accompany the current opt-in form and an explanation of tenants’ rights under that proposal. Further, ECC believes the only way to allow tenants to enter In C/O

¹⁴ Northern States Power Company, ELECTRIC RATE BOOK: STANDARD CONTRACT FOR SOLAR*REWARDS COMMUNITY, Section No.9, Original Sheet No. 99.3.

¹⁵ *Id.*

¹⁶ Northern States Power Company, ELECTRIC RATE BOOK: STANDARD CONTRACT FOR SOLAR*REWARDS COMMUNITY, Section No.9, Original Sheet No. 99.3 at Addendum A.

¹⁷ *Id.*

Billing arrangements in a CSG subscribed building is to require landlords to provide that form to tenants just as the tariff requires landlords to provide the opt-in form. ECC requests the Company provide a return address for the form in their Reply Comments.

Therefore, ECC respectfully recommends the Commission include ECC's proposed tariff changes and the In C/O Billing Form included in Attachment A. With those additions, ECC recommends the Commission approve the Company's In C/O Billing proposal.

V. CONCLUSION

Xcel's existing S*RC tariff has only been in place for about seven months. During that time, ECC has not received tenant complaints about landlords removing them from their Xcel accounts and losing access to the Company's affordability programs. ECC attributes the decrease in complaints, at least in part, to the current S*RC tariff provisions requiring landlords to provide tenants with voluntary participation in building CSGs and the opportunity to opt out of building CSGs.

Under the current tariff's opt-out provision already approved by the Commission, low-income tenants living in CSG subscribed buildings, with individually metered units, can fully re-instate their Xcel Energy accounts and do not have to rely on property owners, landlords, and re-billing agents to convey the regulated utility consumer protections and financial benefits rights to them that they already had as an Xcel customer.

With the modifications proposed by ECC, the Company's In C/O billing proposal maintains significant consumer protections and ensures low-income tenants living in affected buildings remain eligible for Xcel's affordability programs.

ECC respectfully recommends the Commission:

- 1) Approve Xcel Energy's Compliance Filing and the proposed changes to PowerON participant bills to reflect the affordable payment amount.
- 2) Approve, with ECC recommended changes to the S*RC tariff in Attachment A of these comments, Xcel Energy's In Care of Billing Proposal.
- 3) Require Xcel to file the S*RC tariff changes and to establish the effective date of those changes within 30 days of the Commission's Order in this matter.

Respectfully submitted,

March 8, 2024

/s/ George Shardlow
Executive Director
Energy CENTS Coalition

Landlord Addendum

2. Opt-In.

The “Opt-In” provisions apply to all Subscriptions entered into on or after October 1, 2023, where the Landlord has a Subscription associated with a premise with its own meter occupied by a tenant, and for any pre-existing Subscription associated with a premise where a new tenant on or after October 1, 2023, occupies the premise.

Where the Landlord seeks to have a new Subscription associated with a tenant occupied premise or seeks to continue a Subscription where there is a new tenant, the Landlord can only do so after the tenant has voluntarily signed the Opt-In Consent Form set forth in Attachment A to this Addendum and the In Care of Billing Form set forth in Attachment B to this Addendum.

The signed Opt-In Consent Form must be made available to the Company from the Community Solar Garden Operator upon request. The Landlord must provide the In Care of Billing Form to the Company immediately after the Form is signed by a tenant. On the In Care of Billing Form, the Landlord must include the tenant Xcel Energy Account number and any other information required for the tenant to access their Xcel Energy account online. If the tenant does not have internet access, the Landlord must provide the tenant with a hard copy of their monthly Xcel Energy bill.

**Attachment "A" to Landlord Addendum
Opt-In Form**

I consent to Opt-In ~~so as~~ to allow the Landlord for the Premise identified below to have a Community Garden Subscription be associated with this Premise. In doing so, I understand that I ~~will no longer have an Xcel Energy account in my name for this Premise~~ must complete an "In Care Of Billing" form to maintain an active Xcel Energy Account and I understand that I may be rebilled for electric charges through the property owner's billing agent or Landlord. I understand that ~~closing my maintaining an active~~ Xcel Energy account and agreeing to be rebilled for electric usage by the Landlord means I must choose Xcel Energy's "In Care of Billing" in order to remain † ~~will no longer be~~ eligible for any Xcel Energy Affordability Programs (PowerOn, Medical Assistance Program, Senior Low Income Discount) ~~or will not and~~ have protection by the Minnesota Public Utilities Commission under laws governing payment plans, budget billing and payment plan offerings, and protections for medically necessary equipment and medical emergencies. ~~including medically necessary equipment and Cold Weather Rule protections.~~ If I am currently on a payment plan with Xcel Energy, ~~then any outstanding amounts under that payment plan would be immediately due as an "In Care of Billing" customer, my landlord may only charge me the payment plan amount agreed upon with Xcel Energy.~~

I understand I can later Opt-Out and revoke my consent for any reason, and in doing so I will not be charged any fee by the Landlord or the Community Solar Garden Operator for Opting-out, nor any fee to reinstate or become the named customer on the Xcel Energy account.

Name of Tenant: _____

Premise (Property Address, Unit #): _____

Phone #: _____

E-mail address: _____

Tenant Signature: _____

Date: _____

Attachment "B" to Landlord Addendum
In Care of Billing Form

Property Owner Name: _____

Property Owner Phone #: _____

Property Billing Agent Name: _____

Billing Agent Phone # : _____

Billing Agent e-mail address: _____

Name of Tenant: _____

Tenant Xcel Energy Account Number: _____

Premise _____

(Property Address, Unit #, Zip Code)

Tenant Phone #: _____

Tenant E-mail address: _____

Billing Agent Signature: _____

Tenant Signature: _____

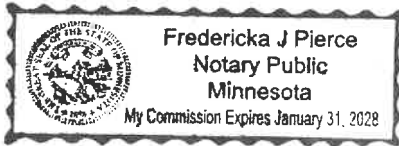
Date: _____

AFFIDAVIT OF SERVICE

George Shardlow certifies that, on March 8, 2024, he submitted, by electronic filing, the Energy CENTS Coalition's Comments In the Matter of Xcel Energy's Tariff Revision Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility, Docket No. E-002/M-21-695 and In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of its Proposed Community Solar Garden Program, Docket No. E-002/M-13-867, to the individuals on the attached service list.



George Shardlow



Fredericka Pierce

Subscribed and sworn to me this 8th day of March, 2024.

Notary Public

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------|--------------------------------------|---------------------------------------|---|--------------------|-------------------|----------------------|
| Ross | Abbey | ross.abbey@us-solar.com | United States Solar Corp. | 100 North 6th St Ste 222C Minneapolis, MN 55403 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Michael | Allen | michael.allen@allenergysolar.com | All Energy Solar | 721 W 26th st Suite 211 Minneapolis, MN 55405 | Electronic Service | No | OFF_SL_21-695_21-695 |
| David | Amster Olzweski | david@mysunshare.com | SunShare, LLC | 1151 Bannock St Denver, CO 80204-8020 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Laura | Beaton | beaton@smwlaw.com | Shute, Mihaly & Weinberger LLP | 396 Hayes Street San Francisco, CA 94102 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Ingrid | Bjorklund | ingrid@bjorklundlaw.com | Bjorklund Law, PLLC | 855 Village Center Drive #256 North Oaks, MN 55127 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Kenneth | Bradley | kbradley1965@gmail.com | | 2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Gabriel | Chan | gabechan@umn.edu | University of Minnesota | 130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, MN 55455 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1400 St. Paul, MN 55101 | Electronic Service | Yes | OFF_SL_21-695_21-695 |
| Kevin | Cray | kevin@communitysolaraccess.org | CCSA | 1644 Platte St Denver, CO 80202 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Timothy | DenHerder Thomas | timothy@cooperativeenergyfutures.com | Cooperative Energy Futures | 3500 Bloomington Ave. S Minneapolis, MN 55407 | Electronic Service | No | OFF_SL_21-695_21-695 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-----------------------------------|-------------------------------------|---|--------------------|-------------------|----------------------|
| James | Denniston | james.r.denniston@xcenergy.com | Xcel Energy Services, Inc. | 414 Nicollet Mall, 401-8 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Brian | Edstrom | briane@cubminnesota.org | Citizens Utility Board of Minnesota | 332 Minnesota St Ste W1360 Saint Paul, MN 55101 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Ron | Elwood | relwood@mnlsap.org | Legal Services Advocacy Project | 970 Raymond Avenue Suite G-40 Saint Paul, MN 55114 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Betsy | Engelking | betsy@nationalgridrenewables.com | National Grid Renewables | 8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437 | Electronic Service | No | OFF_SL_21-695_21-695 |
| John | Farrell | jfarrell@ilsr.org | Institute for Local Self-Reliance | 2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Nathan | Franzen | nathan@nationalgridrenewables.com | Geronimo Energy, LLC | 8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Hal | Galvin | halgalvin@comcast.net | Provectus Energy Development llc | 1936 Kenwood Parkway Minneapolis, MN 55405 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Allen | Gleckner | gleckner@fresh-energy.org | Fresh Energy | 408 St. Peter Street Ste 350 Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_21-695_21-695 |
| | | | | | | | |

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

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| Michael | Kampmeyer | mkampmeyer@a-e-group.com | AEG Group, LLC | 260 Salem Church Road Sunfish Lake, MN 55118 | Electronic Service | No | OFF_SL_21-695_21-695 |
| William D | Kenworthy | will@votesolar.org | Vote Solar | 332 S Michigan Ave FL 9 Chicago, IL 60604 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Brad | Klein | bklein@elpc.org | Environmental Law & Policy Center | 35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Aaron | Knoll | aknoll@greeneespel.com | Greene Espel PLLP | 222 South Ninth Street Suite 2200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Michael | Krause | michaelkrause61@yahoo.com | Kandiyo Consulting, LLC | 433 S 7th Street Suite 2025 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Dean | Leischow | dean@sunrisenrg.com | Sunrise Energy Ventures | 315 Manitoba Ave Ste 200 Wayzata, MN 55391 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Annie | Levenson Falk | annielf@cubminnesota.org | Citizens Utility Board of Minnesota | 332 Minnesota Street, Suite W1360 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Alice | Madden | alice@communitypowermn.org | Community Power | 2720 E 22nd St Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 E 7th St St Paul, MN 55106 | Electronic Service | No | OFF_SL_21-695_21-695 |
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| Jason | Maur | jason.maur@renesolapower.com | Renesola Power Holdings, LLC | 850 Canal Street 3rd Floor Stamford, CT 06902 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Matthew | Melewski | matthew@nokomisenergy.com | Nokomis Energy LLC & Ole Solar LLC | 2639 Nicollet Ave Ste 200 Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Thomas | Melone | Thomas.Melone@AllcoUS.com | Minnesota Go Solar LLC | 222 South 9th Street Suite 1600 Minneapolis, MN 55120 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Marc | Miller | mmiller@soltage.com | Soltage, LLC | 66 York Street, 5th Floor Jersey City, NJ 07302 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Marcus | Mills | Marcus@communitypowermn.org | Community Power | 2720 E 22nd St Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Rolf | Nordstrom | rnordstrom@gpisd.net | Great Plains Institute | 2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Logan | O'Grady | logrady@mNSEIA.org | Minnesota Solar Energy Industries Association | 2288 University Ave W St. Paul, MN 55114 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Patty | O'Keefe | patty.okeefe@sierraclub.org | | 2525 Emerson Ave S Apt 2 Minneapolis, MN 55405 | Electronic Service | No | OFF_SL_21-695_21-695 |

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| Jeff | O'Neill | jeff.oneill@ci.monticello.mn.us | City of Monticello | 505 Walnut Street Suite 1 Monticello, MN 55362 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Carol A. | Overland | overland@legalelectric.org | Legalelectric - Overland Law Office | 1110 West Avenue Red Wing, MN 55066 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Eric | Pasi | ericp@ips-solar.com | IPS Solar | 2670 Patton Rd Roseville, MN 55113 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Dan | Patry | dpatry@sunedison.com | SunEdison | 600 Clipper Drive Belmont, CA 94002 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Jeffrey C | Paulson | jeff.jcplaw@comcast.net | Paulson Law Office, Ltd. | 4445 W 77th Street Suite 224 Edina, MN 55435 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Kristel | Porter | kristel@mnrenewablenow.org | MN Renewable Now | N/A | Electronic Service | No | OFF_SL_21-695_21-695 |
| Paula | Prahl | paula.prahl@dominiuminc.com | Dominium | 2905 Northwest Blvd Ste 150 Plymouth, MN 55441 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131 | Electronic Service | Yes | OFF_SL_21-695_21-695 |
| Isabel | Ricker | ricker@fresh-energy.org | Fresh Energy | 408 Saint Peter Street Suite 220 Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Jonathan | Roberts | jroberts@soltage.com | Soltage | 66 York St 5th Floor Jersey City, NJ 07302 | Electronic Service | No | OFF_SL_21-695_21-695 |

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| Delaney | Russell | delaney@mnipl.org | Just Solar Coalition | 4407 E Lake Street Minneapolis, MN 55407 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Christine | Schwartz | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | Yes | OFF_SL_21-695_21-695 |
| Will | Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7th PI E Ste 350 Saint Paul, MN 55101 | Electronic Service | Yes | OFF_SL_21-695_21-695 |
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| Doug | Shoemaker | dougs@charter.net | Minnesota Renewable Energy | 2928 5th Ave S Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Russ | Stark | Russ.Stark@ci.stpaul.mn.us | City of St. Paul | Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Whitney | Terrill | whitney@mnipl.org | Minnesota Interfaith Power & Light | N/A | Electronic Service | No | OFF_SL_21-695_21-695 |
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| John | Vaughn | Nik@rreal.org | Rural Renewable Energy Alliance | 3963 8th Street SW Backus, MN 55435 | Electronic Service | No | OFF_SL_21-695_21-695 |
| Kevin | Walker | KWalker@beaconinterfaith.org | Beacon Interfaith Housing Collaborative | N/A | Electronic Service | No | OFF_SL_21-695_21-695 |