



February 20, 2014

Via Electronic Filing

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: Reply Comments of the Alliance for Solar Choice
In the Matter of Establishing a Distributed Solar Value Methodology under Minn. Stat. §216B.164, subd. 10 (e) and (f)
Docket No. E-999/M-14-65

Dr. Haar,

Please find enclosed, in connection with the above matter, the Reply Comments of the Alliance for Solar Choice. We have electronically filed this document with the Minnesota Public Utilities Commission, and the filing has been served on the parties on the attached service list.

Please contact Tim Lindl at tlindl@kfwlaw.com or (510) 314-8385 if you have any questions regarding this filing.

Sincerely,

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Enclosures: Initial Comments of the Alliance for Solar Choice
Proof of Service
Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger
David C. Boyd
Nancy Lange
Dan Lipschultz
Betsy Wergin

Chair
Commissioner
Commissioner
Commissioner
Commissioner

IN THE MATTER OF ESTABLISHING A DISTRIBUTED
SOLAR VALUE METHODOLOGY UNDER MINN. STAT.
§216B.164, SUBD. 10 (E) AND (F)

DOCKET No. E-999/M-14-65

REPLY COMMENTS

REPLY COMMENTS OF THE ALLIANCE FOR SOLAR CHOICE

The Alliance for Solar Choice (“TASC”) respectfully submits these reply comments pursuant to the January 31, 2014 Notice of Expedited Comment Period on Distributed Solar Value Methodology Proposal (“Notice”) in the above-captioned docket at the Minnesota Public Utilities Commission (“Commission”). The Commission issued the Notice in response to a filing from the Minnesota Department of Commerce (“Commerce”) submitting a proposed methodology (“Commerce Methodology”) to calculate the rate at which utilities will compensate distributed solar generation (“DSG”) facilities under a value of solar tariff (“VOST”). TASC submitted initial comments in this proceeding on February 13, 2014 showing how the Commerce Methodology should be revised to fully and fairly value the benefits DSG resources provide and how the Commerce methodology reaches incorrect conclusions about the implementation of the VOST that should be corrected.

I. INTRODUCTION AND SUMMARY OF TASC’S REPLY COMMENTS

Minnesota law does not allow an approved VOST to displace a customer-generator’s ability to net customer-exported electricity and utility-provided electricity under Subdivisions 3

and 3a of §216B.164.¹ The initial comments of Xcel Energy, Otter Tail Power Company and Minnesota Power (“IOUs”) include incorrect conclusions about the implementation of the VOST that are contrary to the plain language of those subdivisions. TASC respectfully encourages the Commission to provide guidance to the utilities that Minnesota law limits the VOST’s impact on Subdivisions 3 and 3a to replacing the rate at which generators are compensated for net excess energy. Contrary to the IOUs’ suggestions, the language of the statute does not allow a full buy/sell VOST to completely replace net metering.

II. THE PLAIN LANGUAGE OF THE VOST STATUTE DOES NOT ALLOW THE USE OF A VOST TO COMPLETELY REPLACE A FACILITY’S ABILITY TO NET CUSTOMER-GENERATED AND UTILITY-PROVIDED ELECTRICITY.

The IOUs’ initial comments demonstrate the need for the Commission to provide guidance that the VOST provisions in Subdivision 10 do not discard the monthly netting of customer-exported electricity and utility-provided electricity under Subdivisions 3 and 3a of the State’s laws on Cogeneration and Small Power Production. The language of Subdivisions 3 and 3a, and the regulations implementing those subdivisions, allow DSG installations below 1 MW to:

- (1) Net the solar energy the customer provides onsite with the energy the utility provides from the grid over the course of a monthly billing period;² and
- (2) Receive either the “average retail utility energy rate” (for facilities under 40 kW) or an avoided cost rate (for facilities between 40 kW and 1 MW) for any “net input,”

¹ Minn. Stat. § 216B.164, Subds. 3 and 3a (2013); All references to “subdivisions” in these Reply Comments are to subdivisions in the State’s laws on Cogeneration and Small Power Production, Minn. Stat. § 216B.164, *et seq.* (2013).

² Minn. Stat. § 216B.164, Subd. 3(b) (2013); Subdivision 3 uses the term “net input”. While the statute does not provide an explanation of the timeframe in which “net input” is calculated, the Commission’s rules implementing these sections of the Minnesota Statutes state that this netting is to occur each “billing period,” *i.e.*, on a monthly basis. *See* Minnesota Rules on Cogeneration and Small Power Production, Chapter 7835, Parts 7835.3200-3500.

which occurs when customer-exported electricity exceeds utility-supplied electricity during a billing period.³

Importantly, subdivision 10(b) of the VOST statute clearly states that the VOST “is in lieu of the applicable *rate* under Subdivisions 3 and 3a” (emphasis added).⁴ That is, the VOST only replaces the second component listed above – the rate the solar customer receives for net excess energy during a billing period.

The IOUs’ initial comments make statements to the contrary that are unsupported by the language of Subdivision 10(b).⁵ For example, Xcel Energy’s comments state that a full buy/sell VOST would act “as a replacement of net metering,” suggesting that a DSG facility would no longer be able to net the solar energy the customer provides onsite with the energy the utility provides from the grid.⁶ The statute’s plain language does not support this conclusion. Under Subdivision 10(b), the VOST only replaces the *rate* provided for net excess generation that the solar facility exports beyond the energy the utility supplies in a month.⁷ Under Subdivisions 3 and 3a, the facility retains the ability to net energy generated onsite with the energy the utility provides over the course of a monthly billing period.⁸

The utilities’ apparent misinterpretation of the VOST statute underscores the need for guidance from the Commission regarding any subsequent modifications to the utilities’ tariffs.

³ Minn. Stat. § 216B.164, Subds. 3(c) and (d) (2013). Subdivision 3a also allows for a facility between 40 kW and 1 MW to receive a “kilowatt-hour credit” for any “net input” into the utility system. These facilities receive compensation “at the applicable rate” for any credit remaining at the end of the year. If a utility implements a VOST, these facilities will instead receive compensation at the VOST rate. *See* Minn. Stat. § 216B.164, Subds. 10(a), 10(b) and 3a (2013).

⁴ Minn. Stat. § 216B.164, Subd. 10(b) (2013).

⁵ *Minnesota Power’s Comments*, Docket E999/M-14-65 at p. 2 (February 13, 2013); *Xcel Energy Comments*, Docket E999/M-14-65 at p. 3 (February 13, 2013); *Otter Tail Power Company’s Comments*, Docket E999/M-14-65 at p. 2 (February 13, 2013).

⁶ *Xcel Energy Comments*, Docket E999/M-14-65 at p. 3 (February 13, 2013).

⁷ Minn. Stat. § 216B.164, Subds. 10(b), 3 and 3a (2013).

⁸ *Id.*

As such, TASC reiterates its suggestion that the Commission require the following revisions to the Commerce Methodology:

- “[I]f a VOS tariff is approved, solar customers that opt, at their election, to sell under a full buy/sell arrangement will be billed for all usage under the existing applicable tariff, and will receive a VOS credit for their gross solar energy production.”⁹
- “Energy derived from the PV systems in which the owner has opted, at its election, to sell under a full buy/sell arrangement will not be used to offset (‘net’) usage prior to calculating charges.”¹⁰

Without these revisions, as TASC notes in its initial comments, the Commerce Methodology suggests an interpretation of the VOST provisions that not only conflicts with the plain language of the statute but also raises other critical issues of state and federal law.¹¹

III. THE COMMERCE METHODOLOGY CAN STILL BE UTILIZED IN COMPLIANCE WITH STATE AND FEDERAL LAW.

If the Commerce Methodology is approved, which TASC believes it should not be without the modifications discussed in these comments and TASC’s initial comments, the methodology can still be used in compliance with federal and state law. While TASC acknowledges that the Commerce Methodology looks at the costs and benefits of all generation, not just monthly net input, TASC believes a methodology based on all exports is suitable for being applied solely to monthly excess. It is not uncommon for states to develop a single avoided cost rate that can then be applied to i) all generation, ii) instantaneous exports, iii) monthly excess generation, or iv) annual excess generation.¹² Moreover, Minnesota utilities can still implement a VOST that does not allow netting, *i.e.*, a full buy/sell arrangement; however,

⁹ Commerce Methodology at p. 3.

¹⁰ *Id.* at p. 7.

¹¹ *TASC Initial Comments*, Docket E999/M-14-65 at p. 5 (February 13, 2013).

¹² For example, utilities in Nebraska uses the same avoided cost rate to compensate generators for both monthly and annual net excess energy. See DSIRE net metering database page for Nebraska, available at: http://www.dsireusa.org/incentives/incentive.cfm?Incentive_Code=NE07R&re=1&ee=0.

such a program can only exist in addition to existing netting programs under Subdivisions 3 and 3a.¹³

IV. CONCLUSION

For the reasons discussed above, TASC respectfully requests the Commission provide guidance to the utilities that implementing a VOST will not replace the netting provisions in Subdivisions 3 and 3a.

RESPECTFULLY SUBMITTED this 20th day of February, 2014.



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¹³ *TASC Initial Comments*, Docket E999/M-14-65 at pp. 5-6 (February 13, 2013).

CERTIFICATE OF SERVICE

I, Tim Lindl, hereby certify that I have this day caused to be served copies of the foregoing *Initial Comments of the Alliance for Solar Choice* on the attached list of persons in Docket E999/M14-65 by electronic filing, certified mail, or email.

Dated this 20th day of February, 2014,

A handwritten signature in black ink, appearing to read 'Tim Lindl', with a large, sweeping flourish extending to the right.

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Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	SPL_SL_14-65_Interested Parties
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Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	90 South 7th Street Suite #4800 Minneapolis, MN 554024129	Electronic Service	No	SPL_SL_14-65_Interested Parties
Larry	Johnston	lw.johnston@smmpa.org	SMMPA	500 1st Ave SW Rochester, MN 55902-3303	Paper Service	No	SPL_SL_14-65_Interested Parties
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	SPL_SL_14-65_Interested Parties
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	SPL_SL_14-65_Interested Parties
Nancy	Kelly	bademailnancyk@eurekarecycling.org	Eureka Recycling	2828 Kennedy Street NE Minneapolis, MN 55413	Paper Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave Lakeville, MN 55044	Paper Service	No	SPL_SL_14-65_Interested Parties
Kerry	Klemm	kerry.r.klemm@xcelenergy.com	Xcel Energy Services, Inc	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
John	Kluempke	jkluempke@winlectric.com	Elk River Winlectric	12777 Meadowvale Rd Elk River, MN 55330	Electronic Service	No	SPL_SL_14-65_Interested Parties
Thomas G.	Koehler	N/A	Local Union #160, IBEW	2909 Anthony Ln Minneapolis, MN 55418-3238	Paper Service	No	SPL_SL_14-65_Interested Parties
Mara	Koeller	mara.n.koeller@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Jon	Kramer	jk2surf@aol.com	Sundial Solar	4708 york ave. S Minneapolis, MN 55410	Electronic Service	No	SPL_SL_14-65_Interested Parties
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Scott	Kurtz	Scott.J.Kurtz@xcelenergy.com	Xcel Energy	825 Rice Street St. Paul, MN 55117	Electronic Service	No	SPL_SL_14-65_Interested Parties
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	SPL_SL_14-65_Interested Parties

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Deborah Fohr	Levchak	dlevchak@bepec.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 585030564	Paper Service	No	SPL_SL_14-65_Interested Parties
Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	SPL_SL_14-65_Interested Parties
Mark	Lindquist	N/A	The Minnesota Project	57107 422nd St New Ulm, MN 56073-4321	Paper Service	No	SPL_SL_14-65_Interested Parties
Matthew P	Loftus	matthew.p.loftus@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Bob	Long	rlong@larkinhoffman.com	Larkin Hoffman (Silicon Energy)	1500 Wells Fargo Plaza 7900 Xerxes Ave S Bloomington, MN 55431	Paper Service	No	SPL_SL_14-65_Interested Parties
Rebecca	Lundberg	rebecca.lundberg@powerfullygreen.com	Powerfully Green	11451 Oregon Ave N Champlin, MN 55316	Electronic Service	No	SPL_SL_14-65_Interested Parties
Casey	Maccullum	casey@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Paper Service	No	SPL_SL_14-65_Interested Parties
Susan	Mackenzie	susan.mackenzie@state.mn.us	Public Utilities Commission	Suite 350121 7th Place East St. Paul, MN 551012147	Electronic Service	No	SPL_SL_14-65_Interested Parties
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mike	McDowell		Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Paper Service	No	SPL_SL_14-65_Interested Parties
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 St. Paul, MN 55104-1850	Paper Service	No	SPL_SL_14-65_Interested Parties
Dave	McNary	N/A	Hennepin County DES	701 Fourth Avenue South suite 700 Minneapolis, MN 55415-1842	Paper Service	No	SPL_SL_14-65_Interested Parties
John	McWilliams	jmm@dairynet.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL_14-65_Interested Parties
Valerie	Means	valerie.means@lawmoss.com	Moss & Barnett	Suite 4800 90 South Seventh Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Stacy	Miller	stacy.miller@state.mn.us	Department of Commerce	State Energy Office 85 7th Place East, Suite 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_14-65_Interested Parties
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL_14-65_Interested Parties
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties

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Martin	Morud	mmorud@trunorthsolar.com	Tru North Solar	5115 45th Ave S Minneapolis, MN 55417	Electronic Service	No	SPL_SL_14-65_Interested Parties
Ben	Nelson		CMPMA	459 South Grove Street Blue Earth, MN 56013	Paper Service	No	SPL_SL_14-65_Interested Parties
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Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	SPL_SL_14-65_Interested Parties
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	SPL_SL_14-65_Interested Parties
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Nick	Paluck	nick.paluck@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
James	Pearson	james.g.pearson@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	Suite 801 25 West Main Street Madison, WI 537033398	Electronic Service	No	SPL_SL_14-65_Interested Parties
Donna	Pickard	dpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_14-65_Interested Parties

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Charlie	Pickard	cpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_14-65_Interested Parties
Joseph V.	Plumbo		Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Paper Service	No	SPL_SL_14-65_Interested Parties
Gayle	Prest	gayle.prest@minneapolis.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Paper Service	No	SPL_SL_14-65_Interested Parties
Kent	Ragsdale	kentragsdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_14-65_Interested Parties
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John C.	Reinhardt		Laura A. Reinhardt	3552 26Th Avenue South Minneapolis, MN 55406	Paper Service	No	SPL_SL_14-65_Interested Parties
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Paper Service	No	SPL_SL_14-65_Interested Parties
Enio	Ricci	ericci@invenergyllc.com	Invenergy LLC	17830 New Hampshire Ave Ste 300 Ashton, MD 20861	Paper Service	No	SPL_SL_14-65_Interested Parties
Trudy	Richter	trichter@rranow.com	Minnesota Resource Recovery Assn.	477 Selby Avenue St. Paul, MN 55102	Paper Service	No	SPL_SL_14-65_Interested Parties
Michelle	Rosier	michelle.rosier@sierraclub.org	Sierra Club	2327 E. Franklin Avenue Minneapolis, MN 554061024	Paper Service	No	SPL_SL_14-65_Interested Parties

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Craig	Rustad	crustad@minnkota.com	Minnkota Power	1822 Mill Road PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL_14-65_Interested Parties
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	SPL_SL_14-65_Interested Parties
Raymond	Sand	rms@dairynet.com	Dairyland Power Cooperative	P.O. Box 8173200 East Avenue South LaCrosse, WI 546020817	Electronic Service	No	SPL_SL_14-65_Interested Parties
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	SPL_SL_14-65_Interested Parties
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129 St. Paul, MN 55116	Electronic Service	No	SPL_SL_14-65_Interested Parties
Kevin	Schwain	Kevin.D.Schwain@xcelenergy.com	Xcel Energy	404 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Dean	Sedgwick	N/A	Itasca Power Company	PO Box 457 Bigfork, MN 56628-0457	Paper Service	No	SPL_SL_14-65_Interested Parties
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	SPL_SL_14-65_Interested Parties
Gary	Shaver	N/A	Silicon Energy	3506 124th St NE Marysville, WA 98271	Paper Service	No	SPL_SL_14-65_Interested Parties

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Erin	Shea	eshea@silicon-energy.com	Silicon Energy	11168 Sumter Circle Bloomington, MN 55438	Electronic Service	No	SPL_SL_14-65_Interested Parties
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Avenue South Minneapolis, MN 55408	Paper Service	No	SPL_SL_14-65_Interested Parties
Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	SPL_SL_14-65_Interested Parties
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	SPL_SL_14-65_Interested Parties
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	SPL_SL_14-65_Interested Parties
Chanti	Sourignavong	chantipal.sourignavong@honeywell.com	Honeywell	1985 Douglas Drive North MN10-111A Golden Valley, MN 55422-3992	Paper Service	No	SPL_SL_14-65_Interested Parties
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_14-65_Interested Parties
Byron E.	Starns	byron.starns@leonard.com	Leonard Street and Deinard	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Erin	Stojan Ruccolo	ruccolo@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 220 Saint Paul, MN 55102-1125	Electronic Service	No	SPL_SL_14-65_Interested Parties
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties

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Steve	Thompson		Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Paper Service	No	SPL_SL_14-65_Interested Parties
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	SPL_SL_14-65_Interested Parties
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_14-65_Interested Parties
Darryl	Tveitbakk		Northern Municipal Power Agency	123 Second Street West Thief River Falls, MN 56701	Paper Service	No	SPL_SL_14-65_Interested Parties
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Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	SPL_SL_14-65_Interested Parties

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Steven	Wishart	steven.w.wishart@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Thomas J.	Zaremba		WHEELER, VAN SICKLE & ANDERSON	Suite 801 25 West Main Street Madison, WI 537033398	Paper Service	No	SPL_SL_14-65_Interested Parties