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January 19, 2024

—Via Electronic Filing—

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

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

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these enclosed Comments regarding Proposals submitted on November 1, 2023 and consistent with the Notice of Comment Period provided by the Commission on September 1, 2023 as revised by the Notice of Comment Period issued on November 22, 2023.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served to the parties on the attached service list. Please contact Jessica Peterson at jessica.k.peterson@xcelenergy.com or me at amber.r.hedlund@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

AMBER HEDLUND
MANAGER, REGULATORY PROJECT MANAGEMENT

Enclosures
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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Hiwkwon Ham	Commissioner
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

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

DOCKET NO. E999/CI-16-521

COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (the Company), submits these Comments regarding Proposals submitted on November 1, 2023 and consistent with the Notice of Comment Period provided by the Commission on September 1, 2023 as revised by the Notice of Comment Period issued on November 22, 2023.

Three parties, besides the Company, made proposals regarding modifications to the Minnesota Distributed Energy Resource Interconnection Process (MN DIP) to enable additional customer-sited distributed generation on the distribution grid. Proposals were received by the Dakota Electric Association (Dakota Electric), the Minnesota Rural Electric Association (MREA), and the Minnesota Solar Energy Industries Association (MnSEIA). Otter Tail Power Company (Otter Tail) additionally provided comments but did not make a specific proposal.

Generally, Dakota Electric, Otter Tail and MREA confirmed that their distribution systems are situated differently than Xcel Energy's system. In their distribution grids, the level of capacity constraints and number of interconnection requests are substantially lower than what the Company has come to anticipate on a yearly basis. We appreciate Dakota Electric's nod, however, to the fact that it is possible for other

utilities to see these types of challenges in the future and that action today will provide long-term solutions as suggested by legislation.

Similar to the Company's proposal, Dakota Electric's and MREA's proposals converged around the idea of establishing two specific queues: one queue for small, distributed generation projects up to 40 kW AC, and another for larger projects. The Company continues to support our proposed modifications to the MN DIP as they provide a framework for creating two queues while allowing each specific Area EPS Operator to establish its own implementation options to accomplish this policy change. This is necessary as no two utilities are in the same position today.

In our November 1, 2023 Proposal, the Company proposed to adjust the MN DIP to allow for the prioritization of small customer-sited distributed energy resource (DER) projects of up to 40 kW AC. We believe this can be achieved by altering the MN DIP in the following ways:

- Allow two separate interconnection queues: One queue would be for customer-sited Interconnection Applications up to 40 kW AC (the Priority Queue) and the other for all other Interconnection Applications (the General Queue).
- Allow the Area EPS Operator to reserve available levels of DER capacity in the Priority Queue that differs from the General Queue.

With these MN DIP modifications, the Commission can create changes to prioritize Small DER as required by legislation, but also allow each Area EPS Operator the ability to determine the level of reserved capacity appropriate for its specific technical planning standards.

We provide additional context and address the specific proposals made by Dakota Electric and MnSEIA in the remainder of these Comments.

COMMENTS

I. DAKOTA ELECTRIC'S PROPOSAL

Dakota Electric has proposed a process for utilities to maintain “at least two queues” – one for systems smaller than 40kW and one for systems larger than 40 kW.¹ They go on to explain that the utility would continue to process less than 40 kW

¹ Dakota Electric Association Proposal, In the Matter of Updating Generic Standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities Under Minn. Stat. §216B.161, Docket No. E999/CI-16-521, November 1, 2023, pg. 5. (Dakota Electric Proposal)

applications as they came in, while larger projects (larger than 40 kW) would be studied with the inclusion of the base of existing 40 kW applications and forecasted applications for 6-12 months. No other large projects would be able to interconnect until the first project is cleared for interconnection or withdraws.

Dakota Electric also proposes changes to MN DIP to show additional information on application processing time frames, suggests adjustments to accommodate energy storage and provides for discussion a potential longer-term solution for interconnection issues, introducing a “make ready” concept for cost recovery of investments to the distribution grid.

A. Interconnection Cost Risk Avoided by Reserving Capacity vs. Parallel Processing

Similar to the Company’s proposal, Dakota Electric proposes to have a specific queue to prioritize projects 40 kW AC or less. In addition, while Dakota Electric calls out reviewing projects over 40 kW with a base of “existing and proposed levels of DER”² for implementation, the Company believes that a reservation of capacity as part of our technical planning standard specifications is more precise while providing clear direction to projects larger than 40 kW without the risk of delaying these projects. Further, the Dakota Electric proposal includes having projections of upcoming DER applications up to 40 kW over the next 6 to 12 months, while the Company seeks to give all future DER applications up to 40 kW the ability to interconnect without significant upgrade expenses with the ability to move the interconnection process more expeditiously.

While the Company’s proposed MN DIP changes are somewhat like Dakota Electric’s, we believe our proposal provides additional flexibility and allow each utility to adjust implementation as necessary and specific to their distribution system characteristics. As Dakota Electric also acknowledges, not all utilities are situated the same way when it comes to distribution and capacity levels.

B. Other Proposals

Dakota Electric also provided additional detail outside the legislative mandate for consideration as part of their proposal. This included adding information to MN DIP on application processing time frames, treatment of energy storage, and a “make ready” concept for sharing interconnection upgrade costs for projects under 40 kW.

² Ibid.

Regarding the MN DIP table referenced in Dakota Electric's proposal,³ we believe this additional information on processing time frames for different application paths was intended to provide clarification to the applicants about the process. As this new table would only clarify, but not change the existing MN DIP time frames, we take no position on it. Dakota Electric also suggests some other minor adjustments to MN DIP on pages 8-9.

Dakota Electric, as part of other issues or concerns, notes that they treat energy storage and DER capacity on a combined basis for the purposes of studying for interconnection. In such cases, there could be a 25 kW solar facility plus 20 kW battery energy storage that would then exceed the 40 kW DER capacity as it relates to this docket. We believe Dakota Electric is suggesting clarifying the treatment of energy storage for which the Company would be supportive. The Company looks forward to seeing specific MN DIP wording that Dakota Electric has in mind and suggests that this discussion continue as part of the Distributed Generation Working Group (DGWG).

Dakota Electric also provides for discussion a potential longer-term solution for interconnection issues, introducing a "make ready" concept for cost recovery of investments to the distribution grid for projects under 40 kW (beginning at page 10). Under this proposal, the utility would make necessary upgrades (capped to \$15,000 per project), track the costs, and charge a fee to all small DER projects. The Company already has a cost sharing mechanism for small DER, including a cost sharing fee and fund that pays upgrades up to \$15,000 per project as detailed in Docket No. E002/M-18-714, so we do not take a position on Dakota Electric's proposal that we understand would be only applicable to Dakota Electric.

II. MNSEIA'S PROPOSAL

MnSEIA's proposal begins by stating that before the Commission can consider what changes to the MN DIP are appropriate to prioritize small DER projects, the Commission should determine the legality and reasonableness of the Company's Technical Planning Standard (TPS). As MnSEIA points out, this issue was a subject of a Formal Complaint in Docket No. E002/C-23-424. In its December 14, 2023 hearing regarding Minnesota Solar Advocate's Complaint on the TPS, the Commission voted to find that there were no reasonable grounds to proceed with an investigation and voted to dismiss the complaint without prejudice. In effect, the

³ Dakota Electric Proposal, pg. 8.

Commission confirmed that the Company can continue to use the TPS, which falls within the Company’s engineering judgment. At the time of filing the present Comments, the Commission had not yet issued its written order in that docket.

The Company is unclear regarding the substance of MnSEIA’s proposal to address the interconnection queue as it relates to legislative intent and Commission Notice, as it does not seem to provide a clear path towards interconnecting small DER projects. Rather, MnSEIA seems to provide additional context regarding how a DER application should be reviewed and offers three changes to the MN DIP, including:

- Allow the creation of a different level of screening review for non-exporting or net metered facilities;
- If a screen is not passed – obtaining interconnection approval through the usage of advanced inverter settings for curtailment to mitigate export in excess of grid capacity; and
- For small projects that are not sized to load, the impact of the smaller project or projects on the larger projects in the queue should be determined so that those costs can be offset or otherwise compensated so that larger projects are not prejudiced.⁴

We agree with MnSEIA that proposals should be evaluated based on whether they meet the purpose of legislation.⁵ However, we disagree with MnSEIA’s conjecture of the intent of the 2023 legislation as it relates to small DER interconnection. In fact, the directive by the Minnesota Legislature clearly states:

No later than September 1, 2023, the commission shall open a proceeding to establish interconnection procedures that allow customer-sited distributed generation projects up to 40 kilowatts alternating current in capacity to be processed according to schedules specified in the Minnesota Distributed Energy Resources Interconnection Process, *giving such projects priority over larger projects that may enjoy superior positions in the processing queue.*⁶ (emphasis added)

This language and language defined in Minn. Stat. §216C.378, Sub. 6 (requiring a capacity reservation to projects up to 40 kW) also approved by the 2023 legislation, indicate that the legislation *did* intend to “bypass the larger projects.”⁷ MnSEIA

⁴ Minnesota Solar Energy Industries Association, In the Matter of Updating Generic Standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities Under Minn. Stat. §216B.161, Docket No. E999/CI-16-521, November 1, 2023, pg. 6. (MnSEIA Proposal)

⁵ MnSEIA Proposal, pg. 4.

⁶ House File 2310 (Law 2023, Ch. 60). Art. 12; Section 75

⁷ MnSEIA Proposal, pg. 4.

appears to support any priority to smaller DER projects only if the impact to larger projects can be eliminated, for example, by compensation: "...the time and cost to the larger projects should be offset or otherwise paid or compensated such that the larger project is not prejudiced."⁸ We do not believe this was the intent of the 2023 legislation.

We address the three changes proposed by MnSEIA in the remainder of this section.

A. Screening Tests Based on System Impact to the Grid

Regarding MnSEIA's suggestion that non-exporting or net-metered facilities could be allowed different screening review, the proposal is unclear on how these screens would differ from the Simplified track already defined in MN DIP or what specific changes to the MN DIP are being suggested.

It also appears that MnSEIA may have also suggested a redefinition of net metering⁹ by implying an energy consumption criterion for "sized to load" projects. This change from the customary 120 percent of energy consumption definition to 200 percent as MnSEIA recommends could result in significantly larger DER installations relative to load. We believe adjusting the definition of net metering is outside the scope of the current Notice of Comment Period and should be a subject of much broader discussion outside the MN DIP. The Company does not support MnSEIA's proposal as it does not prioritize small DER installations.

B. Advanced Inverter Settings

MnSEIA's suggestion that "the usage of advanced inverter settings for curtailment to mitigate export in excess of grid capacity"¹⁰ broadly implies advanced inverter settings would resolve all possible system impacts if screening review is not passed. The Company has recently begun studying the use of advanced inverter functionality in its DER interconnection system impact studies, per developer request. Also, advanced inverters are required for all new interconnection applications that are deemed complete after January 1, 2024. IEEE default voltage control settings have a limited range of operation and still require technical review or study to verify that the voltage impacts are resolved and to determine the required settings. Even with custom settings, distribution upgrades may still be required.

⁸ MnSEIA Proposal, pg. 7.

⁹ MnSEIA Proposal, pg. 4.

¹⁰ MnSEIA Proposal, pg. 6.

There are also settings available to limit the maximum output of inverters, which the Company has already allowed applicants to utilize when the Company provides the applicants with reduced capacity options for interconnections to eliminate certain system impacts.¹¹ In certain DER system designs, such as those that include a power control system or a reverse power relay, the DER system can be non-exporting to serve no more than the onsite load. Although, without a significant energy storage system, this would limit a net-metering customer's ability to generate as much power as they consume throughout the year considering the inability of a PV system to generate over nighttime hours. Due to the Company's current engineering practice to include load in the thermal loading calculations,¹² non-exporting DER interconnections would not eliminate the thermal loading constraints for capacity constrained feeders. In certain situations, a reduction of load could also cause voltage related issues.

Based on the reasons provided above, the Company opposes MnSEIA's proposal to include any technical mitigation requirements in MN DIP. The scope of MN DIP should remain procedural. However, the Company would support the creation of an expedited path to interconnection for small, non-exporting, behind the meter interconnection applications. This rule change would require the Company to change its engineering practice to remove load from the thermal loading calculation and calculate by aggregate generation export only.

D. Prejudice to Larger Projects

MnSEIA's proposal suggests that large projects, bypassed by smaller projects, should not incur costs caused by the smaller projects and that any additional time and cost should be compensated from an alternative source. We do not believe that was the intent of legislation and this would also likely cause substantial rework of completed studies for large DER projects. Additionally, MnSEIA has failed to provide any specifics, such as who would administer the fund, who would be required to pay the fees, or how those fees would be collected.

E. Statements on Other States

Of further note, MnSEIA's proposal incorrectly states that the New Mexico affiliate of the Company uses screens for aggregate generating capacity of under 65 percent Substation Rating and compatibility with the transformer rating, additionally noting

¹¹ Due to risks of a factory reset of inverter settings, returning the inverter to 100% output, the Company limits the range of this setting before requiring installers to downsize the inverter.

¹² Calculated by aggregate generation minus minimum daytime load.

that the only restriction is based on Minimum Daytime Loading for Highly Seasonal Circuits.¹³

New Mexico recently updated their interconnection rules and procedures, and we would like to clarify that the “Manual” details provided by MnSEIA in Attachment B to their proposal is not an Xcel Energy document, but a state document dated July 29, 2008. The document is intended to provide more detail and context to New Mexico interconnection procedure for all utilities and interconnection customers in the state. However, this Manual is no longer applicable or relevant as the rules have been altered to reference TIIR rather than the Manual.

The screen referenced by MnSEIA in that document was for aggregate generating capacity of under 65 percent of the service transformer rating, not the substation transformer rating, and is similar to the Minnesota screen in section 3.2.1.7 of MN DIP. References to “highly seasonal load” were removed from the screening process in the updated New Mexico rule. MnSEIA’s references to the New Mexico interconnection standards and processes appear to be misunderstood, misrepresented, outdated, and not relevant to any issue here.

CONCLUSION

The Company appreciates the opportunity to provide these Initial Comments on other parties’ Proposals submitted on November 1, 2023. We continue to believe that our Proposal meets the intent of the legislation and also aligns with the other utilities proposing to establish separate queues for small DER up to 40 kW and larger projects. We do not support any of the proposals presented by MnSEIA.

Dated: January 19, 2024

Northern States Power Company

¹³ Ibid.

CERTIFICATE OF SERVICE

I, Joshua DePauw, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET No. E999/CI-16-521

Dated this 19th day of January 2024

/s/

Joshua DePauw
Regulatory Administrator

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Dean	Hunter	Dean.Hunter@state.mn.us	Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue Saint Paul, MN 55104	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robert	Jagusch	rjagusch@mmua.org	MMUA	3025 Harbor Lane N Minneapolis, MN 55447	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Chris	Jarosch	chris@carrcreekelectricservice.com	Carr Creek Electric Service, LLC	209 Sommers Street North Hudson, WI 54016	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Jeremiason	bjeremiason@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.	205 W. Hwy. 14 Tyler, MN 56178	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kevin	Joyce	kjoyce@tesla.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC	4710 Blaylock Way Inver Grove Heights, MN 55076	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ralph	Kaehler	Ralph.Kaehler@gmail.com		13700 Co. Rd. 9 Eyota, MN 55934	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, MN 55118	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jack	Kegel	jkegel@mmua.org	MMUA	3025 Harbor Lane N Suite 400 Plymouth, MN 55447-5142	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tom	Key	tkey@epri.com	EPRI	942 Corridor Park Blvd Knoxville, TN 37932	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jack	Kluempke	Jack.Kluempke@state.mn.us	Department of Commerce	85 7th Place East Suite 600 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power	1725 US Hwy 12 E Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Corrina	Kumpe	ckumpe@mysunshare.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn	1725 Highway 12 E Ste 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar	3209 W. 76th St #305 Edina, MN 55435	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200 Wayzata, MN 55391	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Nick	Lenssen	lenssen.nick@gmail.com		1195 Albion Way Boulder, CO 80305	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Cheri	Lenzmeier	cheril@mvec.net	Minnesota Valley Electric Cooperative	125 Minnesota Valley Electric Dr Jordan, MN 55352	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_16-521_Official Service List PUC
Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Carl	Linville	clinville@raponline.org	Regulatory Assistance Project	50 State Street Suite #3 Montpelier, VT 05602	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products	PO Box 108 Springfield, MN 56087	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
William	Lovelace	wlovelace@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156 Latham, NY 12110-1156	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.	10710 Town Square Dr NE Ste 201 Minneapolis, MN 55449	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200 Minneapolis, MN 55420	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 Saint Paul, MN 55104-1850	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Matthew	Melewski	matthew@nokomisenergy.com	Nokomis Energy LLC & Ole Solar LLC	2639 Nicollet Ave Ste 200 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, MN 55120	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tim	Mergen	tmergen@meecker.coop	Meecker Cooperative Light And Power	1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Luther	Miller	Luther.C.Miller@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Sergio	Navas	snavas@sundialsolarenergy.com	Sundial Energy, LLC	3363 Republic Ave Saint Louis Park, MN 55426	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Logan	O'Grady	logrady@mNSEIA.org	Minnesota Solar Energy Industries Association	2288 University Ave W St. Paul, MN 55114	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc	P.O. Box 639 Tyler, MN 561780639	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Bethany	Owen	bowen@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Cezar	Panait	Cezar.Panait@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company	PO Box 496 215 S. Cascade St. Fergus Falls, MN 565370496	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Susan	Peirce	Susan.Peirce@state.mn.us	Department of Commerce	85 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Elizabeth	Psihos	elizabeth.psihos@idealenergies.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kenric	Scheevel	Kenric.scheevel@dairylandpower.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, WI 54602	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Matthew	Schuerger	matthew.schuerger@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Cooperative Electric	22636 U.S. Hwy. 59 Worthington, MN 56187	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Assn.	24386 State Hwy. 4, PO Box 529 Sleepy Eye, MN 56085	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

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Robyn	Sonstegard	robyn.s@northstarelectric.coop	North Star Electric Cooperative, Inc.	PO BOX 719 Baudette, MN 56623	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy	401 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric	22636 US Highway 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Bryant	Tauer	btauer@whe.org	Wright-Hennepin	6800 Electric Dr Rockford, MN 55373	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Sam	Villella	sdvillella@gmail.com		10534 Alamo Street NE Blaine, MN 55449	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Wendy	Vorasane	wendy.vorasane@idealenergy.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities	208 S Walnut Ave PO BOX 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Elizabeth	Wefel	eawefel@flahertyhood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John	Williamson	John.Williamson@state.mn.us	Minnesota Department of Labor and Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Danielle	Winner	danielle.winner@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive P.O. Box 88920 Sioux Falls, SD 57108-8920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC