

August 10, 2020

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission 121  
7th Place East, Suite 280  
St. Paul, Minnesota 55101-2147

**RE: Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket Nos. E,G002/CI-02-2034 & E,G002/M-12-383

Dear Mr. Seuffert:

Attached are the Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

Approval of Amendments to its Natural Gas and Electric Service Quality Tariffs  
Originally Established in Docket No. E,G002/CI-02-2034 & Investigation and Audit of  
Service Quality Reporting-Fraudwise Report.

As discussed in the attached Comments, the Department provides its responses to the May 6, 2020 Notice of Comments of the Minnesota Public Utilities Commission (Commission), along with comments submitted by other parties.

The Department agrees with the suggestion in the Commission's July 15, 2020 Notice that those complaints be reviewed in Docket No. E002/M-18-714, which is Xcel's tariff filing to comply with Minnesota Distributed Energy Resources Interconnection Process (MN DIP). Based on the structures that currently exist, the Department continues to recommend that the Commission not allow the 129 complaints filed by the two solar developers in December 2019 to be included in the calculation of customer complaints under Xcel Energy's Quality of Service tariff. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ JOHN KUNDERT  
Financial Analyst

JK/ja  
Attachment



## Before the Minnesota Public Utilities Commission

### Reply Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E,G002/CI-02-2034/M-12-383

#### I. PROCEDURAL HISTORY

On May 6, 2020, the Minnesota Public Utilities Commission (Commission) issued a notice of comment period (Notice) in this proceeding. The Notice identified one issue and five topics open for comment:

**Issue:** Should the Commission find that 129 complaints submitted to the Commission’s Consumer Affairs Office (CAO) be counted in the customer complaints metric in Xcel Energy’s Quality of Service Plan (QSP) tariff?

**Topic(s) Open for Comment:**

- Should the Commission grant Xcel Energy’s request that 129 individual interconnection application complaints from one solar installer not be considered “customer complaints”, and not be included in the customer complaints metric in the Company’s Quality of Service Plan (QSP) tariff, as requested by Xcel?
- Should the threshold for Xcel Energy’s customer complaints performance be re-evaluated?
- Should complaints from solar installers be tracked, not as “customer complaints” for QSP purposes, but instead, in a separate tracking mechanism?
- How should the definition of “customer” in Xcel’s QSP tariff be interpreted?
- Are there other issues or concerns related to this matter?

By July 2, 2020, five parties in addition to the Minnesota Department of Commerce, Division of Energy Resources (Department) filed comments in this proceeding (collectively the Parties):

1. All Energy Solar (AES);
2. Interstate Renewable Energy Council, Inc., Fresh Energy, the Environmental Law and Policy Center, and Vote Solar (Environmental Policy Organizations or EPOs);
3. City of Minneapolis (Minneapolis);
4. Minnesota Solar Energy Industries Associations (MNSEIA); and
5. Novel Energy Solutions (Novel).

On July 15, 2020, the Commission issued a second notice of comment period. The second notice identified the following topic as open for comment – Should the issue of complaints about Xcel’s compliance with the MN DIP be filed and addressed in another open docket: E002/M-18-714?

The Department provides its response to the Commission’s Notice, followed by responses to the Parties’ responses in this proceeding.

## II. DEPARTMENT’S RESPONSE

### A. *SHOULD THE ISSUE OF COMPLAINTS ABOUT XCEL’S COMPLIANCE WITH THE MN DIP BE FILED AND ADDRESSED IN ANOTHER DOCKET, SPECIFICALLY DOCKET NO. E002/M-18-714?*

The Department supports the suggestion in the Commission’s July 15, 2020 Notice for Comments that the complaints regarding Xcel’s compliance with the MN DIP should be addressed in Docket No. E002/M-18-714.

Attempting to add a new metric retroactively would defeat the purpose of encouraging different behavior; thus, at a minimum any new metric should be implemented only on a going-forward basis. In addition to the analysis in our initial comments regarding the definition of “customer,” the Department reviews the information in the record regarding the effects of delays on customers in the following section discussing the Response to Parties’ Comments. This information confirms the conclusion that Xcel’s compliance with the MN DIP should be addressed in Docket No. E002/M-18-714 rather than in Xcel’s QSP tariff.

#### 1. *Harm from Delays*

In our comments dated July 2, 2020 the Department noted that all the customer complaints lodged by the two solar installers regarding the MN DIP should be reviewed, not as customer complaints under the QSP tariff (for the reasons noted above), but as part of the Commission’s review of the MN DIP process. This conclusion is based on the definition of “customer” in Xcel’s QSP and the fact that it has not been established that customers have been harmed.

Beyond the question of whether any harm was caused, we discussed the concept of an “agency problem” where, if there is harm, whether the harm is to Xcel’s Solar\*Rewards customers or to the two solar installers (SI’s). Specifically, the comments stated: “What is not known is whether there was any harm and, if there was, whether the customers (subscribers) or the SI’s bore that harm.” Our Comments noted that, if the focus of the Complainants’ comments was on the financial harm retail ratepayers suffered as a result of the delays in the MN DIP implementation, then there might be an adequate basis for reviewing these complaints within the context of the QSP docket.

Both AES and Novel discussed negative financial effects of Xcel missing deadlines identified in its MN DIP tariff for those companies at length. However, the discussion of the negative financial effects of the delay on retail customers was cursory and not substantiated. AES stated in its Comments:

Not only do customers experience delays in their projects, but also increased costs or reduced incentives. The Federal Tax Credit reduced from 30% in 2019 to 26% in 2020. Xcel failed to meet many deadlines in 2019 causing projects to get pushed to 2020; thereby causing customers to lose out on 4% of their tax credit incentive. Had the deadlines been met on many of those projects, they would have qualified for the larger tax credit. Instead, our company alone experienced over \$150,000 in penalties from our customers and the commitments we made to them. Not all of the delays we experienced were due to Xcel delays but a significant percentage were.<sup>1</sup> [Emphasis added.]

The only financial figure in the above paragraph is a suggestion of harm to AES; there is not information to indicate whether Xcel's customers (AES's subscribers) were harmed. Further, it is unclear how much harm was caused by Xcel's actions or inaction as opposed to other factors such as the siting, finance delays, etc. Such information should be developed and considered in Xcel's compliance with the MN DIP in Docket No. E002/M-18-714.

Similarly, Novel asked the PUC to: "**Demand that Xcel follow [its] tariff and return IA's [interconnection agreements] to developers so that projects can be built** rather than using delays to induce financial distress and halt building of additional projects."<sup>2</sup> A little later in its comments Novel states: "Without IAs, we still have our costs, but none of our revenues." Novel's comments do not provide a financial quantification, but suggest that any financial harm would fall on Novel.

Thus, both AES and Novel suggest that harm would occur to them as solar companies, but there is not evidence either to substantiate the amount of harm due solely to Xcel's actions or inactions or to identify whether any such harm would occur to the Solar Installers or subscribers. Further, there would be no way to verify any such claims due to the lack of information about the contracts between AES or Novel and Xcel's customers who are subscribers, since those contracts are not under the Commission's jurisdiction or part of this record. For example, AES referenced customer-related financial effects in its discussion of the effects of a lower Federal Tax Credit on Xcel's Solar Reward customers. AES did not attempt to quantify that financial harm however, nor would it be possible to verify such quantification without further information about the contracts.

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<sup>1</sup> AES Comments at page 2.

<sup>2</sup> Novel Comments at page 1.

MNSEIA provided estimates of financial harm resulting from the decrease in the Federal Tax Credit from 2019 to 2020 in Attachment A to its comments. MNSEIA's calculation was based on a one-year or two-year delay in a project becoming operational. It recommended that an adder of 1.3¢/kWh be added to the current Value of Solar (VOS) payment for solar energy produced assuming a one-year delay. Under MNSEIA's proposal, this additional assessment would be a penalty assessed on Xcel and paid to "impacted customers."

MNSEIA explains in its comments:

As the federal investment tax credit steps down, projects have become more expensive – and, but for Xcel delays, those expenses would not be incurred. Other costs include new challenges with procuring modules and other equipment during this pandemic and economic recovery, losing entire projects due to projects being pushed into permitting delays, general development costs, paying staff on weaker cash flow, and interest on the refundable deposits. Only some of those other costs are even included in the 1.3¢/kWh number. The industry as a whole and the customers that our members serve have borne the brunt of Xcel's interconnection shortfalls, and deserve recompense as a matter of public policy.

This passage suggests that the primary "impacted customers" that MNSEIA references are the solar developers who have experienced increased costs due to delays in the MN DIP process. While there is a passing mention of Solar\*Rewards customers being directly financially harmed by the issues with MN DIP's installation, the mechanism and extent of the financial benefits accruing to those customers is still nebulous. Further, MNSEIA does not address whether Xcel would be able to surcharge ratepayers for the cost of the proposed 1.3¢/kWh surcharge, nor the basis for either prohibiting or allowing Xcel to surcharge ratepayers for those costs. Thus, if the Commission chooses to pursue MNSEIA's surcharge proposal, the Commission may wish to ask MNSEIA about these aspects of its proposal.

No other party provided examples of ratepayers being financially harmed by Xcel's flawed implementation of its MN DIP portal. The different parties appeared to focus on Solar Installers' financial health, the distributed generation interconnection process, or the City of Minneapolis' clean energy goals.

Given that the QSP tariff was developed to minimize service quality issues (and the corresponding financial effects) on Xcel's Minnesota retail ratepayers, this information appears to support the Department's position that the complaints should not be addressed in the QSP docket. Rather, the focus of those complaints appears to be the negative effects of the delays in the MN DIP implementation process on other stakeholders, specifically solar installers and other stakeholders. Thus, Docket No. E002/M-18-714 is the appropriate venue for that discussion.

## 2. *Origin of QSP*

A second issue relates to the origin of the QSP tariff and its scope. As the EPOs described in their comments:

After the Commission's 2002 investigation into Xcel's service quality performance, the Commission approved a QSP for Xcel, which was most recently revised in 2013. As part of the QSP, Xcel is required to meet certain performance thresholds for things like electric reliability, emergency response time, invoice accuracy, telephone response time, and customer complaints. If it fails to meet performance criteria, Xcel may be subject to fines of up to \$1 million. During negotiations for establishing the customer complaint metric, Xcel proposed that the metric should be based on a seven-year historical average of customer complaints. The Commission approved this approach. A new threshold is calculated each year based on Xcel's historical performance, and for 2019, it is 363 complaints.

The scope of the QSP tariff was based on the Minn. R. 7826 – Electric Utility Standards. The sub-parts of this rule focus on safety, reliability and service along with a section that delineates the reporting requirements for these various topics. There is no discussion of interconnection standards or complaints that might arise from an interconnection process.

In an attempt to determine if the concept that the interconnection issues specific to DER customers might have been addressed during the development of the QSP tariff, the Department reviewed the Commission's Orders in the E,G002/CI-02-2034 and E,G002/M-12-383 dockets. There was no reference to distributed generation or interconnection agreements in any of the Orders we reviewed. Nor was there any discussion of the possibility of any type of vendor or contractor submitting a complaint on their respective customer's behalf. We consider this information to provide further support to the Department's recommendation that the 129 SI customer complaints not be classified as customer complaints under the QSP tariff.

### *B. SHOULD SOLAR INSTALLERS' COMPLAINTS SUBMITTED TO THE CAO BE COUNTED AS CUSTOMER COMPLAINTS FOR THE PURPOSES OF XCEL'S QSP TARIFF?*

Table 1 summarizes the different parties' responses to this question.

**Table 1 – Parties Positions on Applicability of QSP Tariff to Solar Installer CAO Complaints**

<b>Party</b>	<b>Position</b>
AES	Accept the CAO complaints from two solar installers.
Department	Exclude the CAO complaints from the two solar installers.
EPOs	Accept the CAO complaints from the two solar installers.
Minneapolis	Accept the CAO complaints from the two solar installers.
MNSEIA	Accept the CAO complaints from the two solar installers.
Novel	Did not state explicitly but did state that they “agree with the CAO complainant that Xcel’s implementation of the MN DIP process is flawed”.

As discussed above, AES and Novel’s comments focused primarily on the financial ramifications of Xcel’s tardiness related to the MN DIP to their respective businesses.

EPO’s comments covered the development of the QSP and the MN DIP tariffs at length. In regards to the question as to whether the two Solar Installers have standing under the phrase “an individual authorized by the Customer to act on his/her account” included in the definition of an entity in the QSP filing that may file a customer complaint on the retail customer’s behalf, the EPO responded affirmatively. Their comments also state that the inclusion of solar interconnection complaints in the QSP customer complaint metric will “improve accountability.”

EPO develops its position further by adopting a position that interconnection complaints are appropriately classified as “related to the provision of customer service.” They also mention that the QSP tariff does not explicitly limit Xcel service to exclude complaints related to solar installations. EPO concludes by recommending that solar interconnection complaints should be tracked under the QSP and the MN DIP.

Minneapolis takes a slightly different approach. The City cites the Commission’s website and a definition of Service Quality Index from the Regulatory Assistance Project to conclude that complaints from solar customers should not be treated differently from other customers. Like the EPOs, Minneapolis suggests that the language in the MN DIP process related to referring interconnection complaints to the CAO was intended to allow those complaints to be counted in the QSP process. Minneapolis included two qualifying criteria relative to the CAO complaints:

- 1) The customer was aware that their contracted solar installer was filing a complaint on their behalf and supported this action.
- 2) CAO accepted the complaint as filed, or if CAO had requests to clarify the legitimacy of a complaint, the complainant was responsive to these requests.

Minneapolis also referred to the exclusion of solar installer complaints from the QSP as being discriminatory towards that group.

MNSEIA stated in part:

- “The Commission should find Xcel Energy in violation of its QSP tariff. The Company itself has illustrated that it would not be, but for its consistent violation of the MN DIP.”
- The Commission should, at minimum, require Xcel Energy to make the necessary investments in staff and software to meet its MN DIP obligations.
- An additional financial penalty of 1.3¢/kWh, which is based on an estimate of the harm done to the average array on a per/kW basis, should be assessed to the utility and dispersed among the impacted customers.

Regarding the Commission’s first question, MNSEIA take a position similar to EPO’s, that a solar installer meets the requirement of being “the customers’ representative.” MNSEIA’s comments continue in that vein.

As discussed at length in our previous comments and developed further above, the Department does not agree with that interpretation.

The next issue centers on the interpretation of definition of customer included in the QSP tariff. As we explained in our prior comments, the Department’s interpretation of that defined term is as to whether the retail customer or their representative filed the complaint due to the retail customer was harmed financially. Our review of the other parties’ comments did not identify any specific instances of retail customers suffering financial harm. Until such harm is demonstrated, we maintain our position that the Solar Installers’ complaints should not be included in the QSP complaint calculation in this proceeding.

*C. SHOULD THE THRESHOLD FOR XCEL ENERGY’S CUSTOMER COMPLAINTS PERFORMANCE BE RE-EVALUATED?*

As noted above, the Department concludes that the Solar Installers’ complaints should not be included in the QSP in this proceeding, and would be better considered in Docket No. E002/M-18-714. Considerations regarding interconnection matters are different than those involving retail customers.

For example, some of the questions with interconnection matters may include:

- determining an acceptable number of complaints regarding interconnections,
- quantifying the causes of delays – how much due to Xcel’s actions or inactions, how much to other causes such as the effects of COVID-19, siting issues, developer financing, etc.,
- determining whether such complaints should be counted by the entity attempting to interconnect, the interconnection entity’s subscribers, Xcel’s customers, or some hybrid, and
- deciding whether and if so how to consider impacts on Xcel’s customers that are not subscribers but would be affected by the costs of the generation facility.



*D. SHOULD SOLAR INSTALLERS’ CAO COMPLAINTS BE TRACKED IN A NON-QSP DOCKET?*

Table 2 summarizes the parties’ responses to the Commission’s second question.

**Table 2 – Should CAO Complaints be Tracked in a Non-QSP Docket?**

<b>Party</b>	<b>Position</b>
AES	Not explicitly stated.
Department	Yes.
EPOs	No, counting complaints in QSP filing (with financial penalties) creates “greater accountability.”
Minneapolis	No. “A separate tracking mechanism would remove the utility’s incentive to work expediently to resolve interconnection issue, and this would lead to discriminatory treatment of customers interested in solar.”
MNSEIA	Not explicitly stated.
Novel	Not explicitly stated.

The Commission’s July 15 notice identified a specific docket for the purpose of tracking Xcel’s implementation of its MN DIP – Docket No. E002/M-18-714. This docket’s title is “In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established under Minn. Stat. §216B.1611.”

The Department supports the idea of moving these complaints to Docket No. E002/M-18-714. Focusing on interconnection complaints in that proceeding would provide further learning about interconnection issues.

*E. HOW SHOULD THE DEFINITION OF CUSTOMER BE INTERPRETED IN THE QSP TARIFF?*

Table 3 summarizes the parties’ responses to the Commission’s third question.

**Table 3 – Should Solar Installer Have Standing to File Complaints on Behalf of Retail Customers?**

<b>Party</b>	<b>Position</b>
AES	Not explicitly stated.
Department	No.
EPOs	Yes.
Minneapolis	Yes.
MNSEIA	Yes.
Novel	Not explicitly stated.

As noted in our Comments, the Department relies on the definition of “customer” in the tariff:

For purposes of Customer Complaints, “Customer” is defined as an electric or a natural gas customer that receives a bill for utility service, service from the Company or a representative of that customer. A representative includes an individual designated with Power of Attorney for the Customer, an attorney retained to represent the Customer, or an individual authorized by the Customer to act on his/her account.

As noted above, the Department supports tracking interconnection complaints in Docket E002/M-18-714. However, changing the definition of customer in the QSP tariff would involve further questions about interconnections, as noted above, including what an acceptable number of complaints would be, how the definition of “customer” may need to change, whether other affected customers’ interests need to be considered, and how to quantify and assign responsibility for causes of delays – (e.g. Xcel’s actions or inactions, effects of COVID-19, siting issues, developer financing, etc.).

Thus, the Department does not recommend any changes to the existing language.

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

Table 4 summarizes the parties’ responses to the Commission’s fourth question.

**Table 4 – Other Issues or Concerns**

<b>Party</b>	<b>Position</b>
AES	None explicitly identified.
Department	None
EPOs	None
Minneapolis	Expressed concerns related to Xcel’s reporting of withdrawn solar projects, but did not appear to provide a recommendation.
MNSEIA	<ol style="list-style-type: none"> <li>1. Require Xcel Energy to make the necessary investments in staff and software to meet its MN DIP obligations.</li> <li>2. Initiate a reinvestigation in MN PUC Docket 16-521 into whether the timeliness for project are an appropriate length.</li> <li>3. Require Xcel Energy to implement cluster studies to eliminate the need for On-Hold status in simplified projects.</li> <li>4. Require Xcel Energy to pay an additional financial penalty of 1.3¢/kWh, which is based on an estimate of the harm done to the average array, to all impacted DER customers.</li> </ol>
Novel	None explicitly identified.

We have no comments regarding the City of Minneapolis' concerns related to Xcel's reporting of withdrawn solar projects as we are not sure how this information relates to the QSP tariff. This might be an issue that would be better addressed in a topic-specific docket. As to MNSEIA's four additional recommendations, the Department believes those issues should also be addressed in the 18-714 docket. The level of review necessary to determine reasonable recommendations for those topics requires additional time and expertise to develop. That development is also better suited for a topic-specific docket.

### **III. DEPARTMENT RECOMMENDATIONS**

The Department continues to recommend that the Commission not allow the 129 complaints filed by the two solar developers in December 2019 to be included in the calculation of customer complaints under Xcel Energy's Quality of Service tariff.

However, the Department recommends that those same 129 solar installer complaints be reviewed in Docket No. E002/M-18-714, where issues related specifically to interconnection matters can be further developed.

/ja

## **CERTIFICATE OF SERVICE**

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

**Minnesota Department of Commerce  
Reply Comments**

**Docket No. E,G002/CI-02-2034 and E,G002/M-12-383**

Dated this **10<sup>th</sup>** day of **August 2020**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_2-2034_1
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_2-2034_1
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_2-2034_1
Susan	Medhaug	Susan.medhaug@state.mn.us	Department of Commerce	Suite 280, 85 Seventh Place East  St. Paul, MN 551012198	Electronic Service	No	OFF_SL_2-2034_1
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_2-2034_1
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_2-2034_1
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_2-2034_1
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_2-2034_1
Rebecca S.	Winegarden	beckwine@msn.com	Unknown	10555 Union Terrace Ln N  Maple Grove, MN 553692622	Electronic Service	No	OFF_SL_2-2034_1

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211  Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_12-383_Official
Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP	396 Hayes Street  San Francisco, CA 94102	Electronic Service	No	OFF_SL_12-383_Official
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_12-383_Official
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_12-383_Official
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_12-383_Official
Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities	145 University Ave. W.  Saint Paul, MN 55103-2044	Electronic Service	No	OFF_SL_12-383_Official
Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC	4710 Blaylock Way  Inver Grove Heights, MN 55076	Electronic Service	No	OFF_SL_12-383_Official
William	Kenworthy	will@votesolar.org		18 S. Michigan Ave Ste 1200  Chicago, IL 60603	Electronic Service	No	OFF_SL_12-383_Official
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_12-383_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-383_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_12-383_Official
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_12-383_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-383_Official
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_12-383_Official
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave  Saint Paul, MN 55105	Electronic Service	No	OFF_SL_12-383_Official
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-383_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-383_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_12-383_Official
Peter	Teigland	pteigland@mnseia.org	MnSEIA	2288 University Ave. W.  St. Paul, MN 55114	Electronic Service	No	OFF_SL_12-383_Official