

215 South Cascade Street  
PO Box 496  
Fergus Falls, Minnesota 56538-0496  
218 739-8200  
[www.otpc.com](http://www.otpc.com) (web site)



May 6, 2016

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

**RE: In the Matter of a Commission Inquiry into Fees Charged on Qualifying Facilities  
Docket No. E999/CI-15-755  
Otter Tail Power Company's Comments**

Dear Mr. Wolf:

Otter Tail Power Company (Otter Tail) hereby submits its comments to the Minnesota Public Utilities Commission's (Commission) Notice Requesting Comments issued December 23, 2015 in the above described docket.

Otter Tail has electronically filed this document with the Commission and is serving a copy on all persons on the official service list for this docket. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 218-739-8956 or at [cstephenson@otpc.com](mailto:cstephenson@otpc.com).

Sincerely,

*/s/ CARY STEPHENSON*  
Cary Stephenson  
Associate General Counsel

nlo  
Enclosures  
By electronic filing  
c: Service List

**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of a Commission  
Inquiry into Fees Charged on  
Qualifying Facilities

Docket No. E999/CI-15-755

**OTTER TAIL POWER  
COMPANY'S COMMENTS**

**I. INTRODUCTION AND BACKGROUND**

Otter Tail Power Company (Otter Tail) files the following comments in response to the Minnesota Public Utilities Notice Requesting Comments issued December 23, 2015.

**II. COMMENT TOPICS**

**Question:** “Is any additional fee imposed on a customer with a distributed generation system interconnected with a cooperative or municipal utility before July 1, 2015, or at any time with a public utility, permissible under Minn. Stat. § 216B.164 and/or Minn. Rules, Chapter 7835, including part 7835.3000?”

**Answer:** Certain additional fees charged to customers with distributed generation systems by public utilities are permissible under Commission statutes, rules and practice, including Minn. Stat. § 216B.164, and Minn. Rules, Chapter 7835. These include customer charges rooted in cost-causation principles intended to recover a portion of the incremental cost of providing service to qualifying facilities such as special metering and related operations and maintenance (O&M) expenses.

Rates, including fees and charges,<sup>1</sup> are to be “just and reasonable.”<sup>2</sup> Likewise “[r]ates shall not be unreasonably preferential, unreasonably prejudicial, or discriminatory, but shall be sufficient, equitable, and consistent in application to a class of consumers.”<sup>3</sup> Commission statutes and rules establish procedures and standards for approving rates and fees, including rate

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<sup>1</sup> Under Minn. Stat. § 216B.02, Subd. 5 rates include customer fees and charges.

<sup>2</sup> Minn. Stat. § 216B.03.

<sup>3</sup> Id.

case proceedings.<sup>4</sup> In setting rates and customer charges, the Commission has traditionally reviewed and approved of rates based on cost-causation principles that fairly allocate costs to rate classes and customers based on cost of service studies and other supporting documentation.

The Commission's statutory authority to approve public utility rates using cost-causation principles necessarily includes the authority to approve fees designed to recover a just and reasonable portion of incremental equipment expenses and/or incremental operations and maintenance expenses (O&M expense) associated with specialized service or rates. This includes customer fees associated with off peak controls, distributed generation, electric vehicles and any other specialized rates.

The Commission's broad statutory authority to approve rates for public utilities, including customer fees for incremental equipment and O&M expense is consistent with and not constrained by Minn. Stat. § 216B.164 and Minn. Rules, Chapter 7835. A common theme of Minn. Stat. § 216B.164 is that qualifying facilities should not be excused from fees charged to non-generating customers. § 216B.164 Subd. 8(b) makes clear that qualifying facilities should be subjected to fixed fees normally assessed to nongenerating customers: “[n]othing contained in this section shall be construed to excuse the qualifying facility from any obligation for costs of interconnection and wheeling in excess of those normally incurred by the utility for customers with similar load characteristics who are not cogenerators or small power producers, or from any fixed charges normally assessed such nongenerating customers.”

Likewise Minn. Stat. § 216B.164, Subd. 3(c) requires consideration of fixed distribution costs to the utility not accounted for in the basic monthly charge.<sup>5</sup> While the Commission is required to construe Minn. Stat. § 216B.164 “to give the maximum possible encouragement to cogeneration and small power production” the Commission must balance such consideration with protection of the ratepayers and the public.<sup>6</sup>

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<sup>4</sup> Minn. Stat. § 216B.16.

<sup>5</sup> While this language is in the section associated with rate setting for customers with qualifying facilities more than 40kW in capacity Otter Tail does not believe this limits the Commission broad authority to approve customer charges for small qualifying facilities for incremental O&M expenses based on cost-causation principles, especially when the fees are established in a rate case and supported by appropriate cost of service studies.

<sup>6</sup> Minn. Stat. § 216B.164, Subd. 1.

In Otter Tail’s view there is clear authority for a utility to recover from distributed generation customers incremental equipment and O&M expenses and where such fees are based on traditional cost-causation principles applicable to other customers with specialized rates.<sup>7</sup> Excluding distributed generation customers from fees under these circumstances is inconsistent with the standard, barring an unreasonable preferences or advantages in rate setting.<sup>8</sup>

**Question:** “If an additional fee is not directly prohibited by relevant statutes or rules, what factors should the Commission consider in determining whether an additional fee charged by or proposed by a utility is permitted and reasonable?”

**Answer:** Otter Tail believes the Commission should consider cost-causation principles, general statutory guidance under Minn. Stat. § 216.03 and Minn. Stat. § 216.07, and the rate setting principles set forth in Minn. Stat. § 216B.16, Subd. 6.

### **Questions**

- Is the additional monthly fee imposed by Connexus Energy permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?
- Is the additional monthly fee imposed by Goodhue Cooperative Electric Association permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?
- Is the additional monthly fee imposed by Mille Lacs Electric Cooperative permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?
- Is the additional monthly fee imposed by Minnesota Power permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?
- Is the additional monthly fee imposed by Otter Tail Power permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?

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<sup>7</sup> In its filing in this docket dated December 10, 2015 Otter Tail noted that it applies cost-causation principles for incremental equipment and O&M expense to non-distributed generation customers.

<sup>8</sup> Minn. Stat. § 216B.07 RATE PREFERENCE PROHIBITED. No public utility shall, as to rates or service, make or grant any unreasonable preference or advantage to any person or subject any person to any unreasonable prejudice or disadvantage.

- Is the additional monthly fee imposed by Xcel permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?
- Any other docket related issues

**Answer:** Otter Tail is not in a position to comment in any detail on the permissibility and reasonableness of fees charged by other entities at this time. To the extent that other utilities fees are based on the principles noted above Otter Tail believes such fees are permissible and presumptively reasonable.

Otter Tail's customer charges in its small power producer tariffs<sup>9</sup> are permissible under Minnesota Statutes and Rules as noted above and inherently reasonable. It is important to note that the Commission approved Otter Tail's current customer charges for qualifying facilities in Otter Tail's last completed general rate case, Docket No. E017/GR 10-239. In that rate case Otter Tail provided a cost of service study and other supporting evidence for its proposed rates including customer charges.

The customer charges for small power producers approved in Docket No. E017/GR 10-239 were modest and designed to recover a just and reasonable portion of the incremental cost of providing service to qualifying facilities such as special metering and related O&M expenses (e.g. Meter, Customer Accounts & Customer Services) all based on standard cost-causation principles. The customer charges were part of the overall rate design approved by the Commission. As Otter Tail has noted in a prior filing in this docket it applies the same customer charge methodology to non-distributed generation customers, including customers selecting service under the Company's water-heating control rider and off-peak electric vehicle rider. Also of note is that before Docket No. E017/GR 10-239 the modest customer charges for qualifying facilities had not been adjusted for 26 years, which underscores the reasonable nature of these charges.<sup>10</sup>

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<sup>9</sup> Sections 12.01-12.04 of Otter Tail's Tariff.

<sup>10</sup> Prior to Docket 10-239 the small power producer customer charges were addressed in Docket Nos. E120/M-83-388 and E017/CG-84-384.

The process by which these charges were adopted and the amount of the charges is entirely consistent with the Commission obligation to construe Minn. Stat. § 216B.164 to give “maximum possible encouragement to cogeneration and small power production” while balancing that “consideration with protection of the ratepayers and the public.” The charges are both permissible and reasonable.

Dated: May 6, 2016

Respectfully Submitted,

OTTER TAIL POWER COMPANY

By: /s/ CARY STEPHENSON

Cary Stephenson

Associate General Counsel

215 S. Cascade Street

Fergus Falls, MN 56537

(218) 739-8956

[cstephenson@otpc.com](mailto:cstephenson@otpc.com)

## CERTIFICATE OF SERVICE

**RE: In the Matter of a Commission Inquiry into Fees Charged on Qualifying Facilities  
Docket No. E999/CI-15-755**

I, Nancy L. Olson, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company  
Comments**

Dated this 6th day of May, 2016.

/s/ NANCY L. OLSON

Nancy L. Olson  
Regulatory Filing Coordinator  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls MN 56537  
(218) 739-8376

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	ross@mysunshare.com	SunShare, LLC	609 S. 10th Street Suite 210 Minneapolis, MN 55404	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211  Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-755_Official Service List _PUC
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Sara	Baldwin Auck	sarab@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156  Latham, NY 12110	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Kathleen M.	Brennan	kmb@mcgrannshea.com	McGrann Shea Carnival, Straughn & Lamb, Chartered	N/A	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Joel	Cannon	jcannon@tenksolar.com	Tenk Solar, Inc.	9549 Penn Avenue S  Bloomington, MN 55431	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
John J.	Carroll	jcarroll@newportpartners.com	Newport Partners, LLC	9 Cushing, Suite 200  Irvine, California 92618	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road  Meredith, NH 32535413	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Landscapes	234 Jackson Ave N  Hopkins, MN 55343	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206  St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Darabi	james.darabi@solarfarm.com	Solar Farm, LLC	2355 Fairview Ave #101  St. Paul, MN 55113	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Dustin	Denison	dustin@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St  Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	1400 Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Mike	Eggl	megg1@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58503	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Kristen	Eide Tollefson	N/A	R-CURE	28477 N Lake Ave  Frontenac, MN 55026-1044	Paper Service	No	OFF_SL_15-755_Official Service List_PUC
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303  Minneapolis, MN 55414	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Amy	Fredregill	Amy.S.Fredregill@xcelenergy.com	Xcel Energy	414 Nicollet Mall  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway  Minneapolis, MN 55405	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Elaine	Garry	egarry@peoplesrec.com	Peoples Energy Cooperative	1775 Lake Shady Ave S  Oronoco, MN 55960-2351	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Bryan	Gower	bgower@apx.com	APX, Inc.	N/A	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Timothy	Gulden	info@winonarenewableenergy.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr  Winona, MN 55987	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Duane	Hebert	duane.hebert@novelenergy.biz	Novel Energy Solutions	1628 2nd Ave SE  Rochester, MN 55904	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
John	Helmers	helmers.john@co.olmsted.mn.us	Olmsted County Waste to Energy	2122 Campus Drive SE  Rochester, MN 55904-4744	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Jared	Hendricks	hendricksj@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Lynn	Hinkle	lhinkle@mnseia.org	Minnesota Solar Energy Industries Association	2512 33rd Ave South #2  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Jim	Horan	Jim@MREA.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Ashley	Houston			120 Fairway Rd  Chestnut Hill, MA 24671850	Paper Service	No	OFF_SL_15-755_Official Service List_PUC
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane  Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_15-755_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_15-755_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_15-755_Official Service List _PUC
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248  Madison, SD 57042	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Michael	Kampmeyer	mkampmeyer@a-e- group.com	AEG Group, LLC	260 Salem Church Road  Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
John	Kearney	jmkearney@MnSEIA.org	MnSEIA	2512 33rd Ave S  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Kevin	Keene	kevin.keene@cummins.co m		N/A	Electronic Service	No	OFF_SL_15-755_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_15-755_Official Service List _PUC
Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave  Lakeville, MN 55044	Paper Service	No	OFF_SL_15-755_Official Service List _PUC
Madeleine	Klein	mklein@socoreenergy.com	SoCore Energy	225 W Hubbard Street Suite 200 Chicago, IL 60654	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_15-755_Official Service List_PUC
John	Kluempke	jwkluempke@winlectric.com	Elk River Winlectric	12777 Meadowvale Rd  Elk River, MN 55330	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Jon	Kramer	jk2surf@aol.com	Sundial Solar	4708 york ave. S  Minneapolis, MN 55410	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Jeffrey L.	Landsman	jlandsman@wheelerlaw.com	Wheeler, Van Sickle & Anderson, S.C.	44 E. Mifflin Street, 10th Floor  Madison, WI 53703	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Harold	LeVander, Jr.	hlevander@felhaber.com	Felhaber, Larson, Fenton & Vogt, P.A.	Suite 2100 444 Cedar Street St. Paul, MN 551012136	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Dean	Leischow	dean@sunriseenergyventures.com	Sunrise Energy Ventures	601 Carlson Parkway, Suite 1050  Minneapolis, MN 55305	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Deborah Fohr	Levchak	N/A	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 585030564	Paper Service	No	OFF_SL_15-755_Official Service List_PUC
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	OFF_SL_15-755_Official Service List_PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products	PO Box 108  Springfield, MN 56087	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Rebecca	Lundberg	rebecca.lundberg@powerfullygreen.com	Powerfully Green	11451 Oregon Ave N  Champlin, MN 55316	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Casey	MacCallum	casey@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Erica	McConnell	mcconnell@smwlaw.com	Shute, Mihaly & Weinberger LLP	396 Hayes St  San Francisco, California 94102-4421	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200  Minneapolis, MN 55420	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
John	McWilliams	jmm@dairy.net	Dairyland Power Cooperative	3200 East Ave SPO Box 817  La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Alan	Miller	N/A		2210 20th St NE  Stewartville, MN 55976	Paper Service	No	OFF_SL_15-755_Official Service List _PUC
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	OFF_SL_15-755_Official Service List _PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moe	momentums@aol.com		2825 28th Ave S  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Avenue North  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Dalene	Monsebroten	dalene@mncable.net	Northern Municipal Power Agency	123 2nd St W  Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Martin	Morud	mmorud@trunorthsolar.com	Tru North Solar	5115 45th Ave S  Minneapolis, MN 55417	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Ben	Nelson		CMPMA	459 South Grove Street  Blue Earth, MN 56013	Paper Service	No	OFF_SL_15-755_Official Service List _PUC
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Will	Nissen	nissen@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220  Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
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_15-755_Official Service List _PUC
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248  Madison, SD 570420248	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive  Belmont, CA 94002	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	7301 Ohms Ln Ste 325  Edina, MN 55439	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
John	Pendray	john.pendray@cummins.com		N/A	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor  Madison, WI 53703	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Donna	Pickard	dpickardgsss@gmail.com	Citizen	1215 Lilac Lane  Excelsior, MN 55331	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
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_15-755_Official Service List _PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gayle	Prest	gayle.prest@minneapolisn.gov	City of Mpls Sustainability	350 South 5th St, #315  Minneapolis, MN 55415	Electronic Service	No	OFF_SL_15-755_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_15-755_Official Service List_PUC
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300  Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
John C.	Reinhardt		Laura A. Reinhardt	3552 26Th Avenue South  Minneapolis, MN 55406	Paper Service	No	OFF_SL_15-755_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_15-755_Official Service List_PUC
Craig	Rustad	crustad@minnkota.com	Minnkota Power	1822 Mill Road PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227  Madison, SD 57042	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390  St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Kenric	Scheevel	kjs@dairy.net	Dairyland Power Cooperative	3200 East Avenue South PO Box 817 La Crosse, Wisconsin 54602	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC

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Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW  Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Dean	Sedgwick	N/A	Itasca Power Company	PO Box 457  Bigfork, MN 56628-0457	Paper Service	No	OFF_SL_15-755_Official Service List _PUC
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	2952 Beechwood Ave  Wayzata, MN 55391	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Ave S  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201  St. Paul, MN 55104	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828  Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	Thompson	stevet@cmmpa.org	Central Minnesota Municipal Power Agency	459 S Grove St  Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
SaGonna	Thompson	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Sam	Villella	sdvillella@gmail.com		10534 Alamo Street NE  Blaine, MN 55449	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800  Owatonna, MN 55060	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind	618 2nd Ave SE  Minneapolis, MN 55414	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Jason	Willett	jason.willett@metc.state.mn.us	Metropolitan Council	390 Robert St N  Saint Paul, MN 55101-1805	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Daniel	Williams	DanWilliams.mg@gmail.com	Powerfully Green	11451 Oregon Avenue N  Champlin, MN 55316	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Randi	Winter	rwinter@felhaber.com	Felhaber Larson	Felhaber Larson 220 South Sixth Street, Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC

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Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-755_Official Service List_PUC
Thomas J.	Zaremba	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor  Madison, WI 53703	Electronic Service	No	OFF_SL_15-755_Official Service List_PUC