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May 1, 2015

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

RE: **Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-13-867

Dear Mr. Wolf:

The Minnesota Department of Commerce, Division of Energy Resources (Department) is filing these *Reply Comments* in response to the Minnesota Public Utilities Commission's (Commission) March 13, 2015 *Notice of Comment Period* in the following matter:

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

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Rates Analyst

SLP/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

REPLY COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. E002/M-13-867

I. INTRODUCTION

The Minnesota Department of Commerce (Department) appreciates the opportunity to submit *Reply Comments* in response to the Minnesota Public Utilities Commission's (Commission) March 13, 2015 *Notice of Comment Period* and other parties' April 2, 2015 *Comments*.

As the Department prepared these *Reply Comments*, Northern States Power Company, dba Xcel Energy (Xcel or the Company) filed *Supplemental Comments and Notice to Administer Program* (Notice) on April 28, 2015. As discussed on pages 3-5 of the Department's *Comments* filed on April 2, 2015, Xcel's retroactive program administration plan does not comply with the Commission's Orders and the Company's approved tariffs regarding co-location of community solar gardens. Xcel's Notice adds to the Department's growing concerns about the reasonableness and timing of Xcel's administration of its Solar*Rewards Community program, specifically whether the Company's processing timelines and steps regarding solar garden interconnection applications conforms with the Company's Section 10 tariff.

The Commission's Orders are clear regarding the required administration by Xcel of the Solar*Rewards Community program. The Department expects Xcel to administer the program and process applications according to the Commission's Orders and the Company's approved tariffs.

II. DEPARTMENT ANALYSIS

A. REVIEW OF 2015 VALUE OF SOLAR CALCULATION

Xcel's calculation of the updated environmental discount rate appears to be correct and, thus, its calculation of the Value of Solar ("VOS") rate is correct. The Department offers the following clarifications regarding Xcel's calculations.

In Xcel's March 2, 2015 initial VOS calculation filing, the Company used the same environmental discount rate of 5.83 percent as it used in the Company's 2014 filing. The environmental discount rate changes with changes to the escalation rate using the VOS methodology equation 11. As the general escalation rate used in the calculation changed from the 5.83 percent used in Xcel's 2014 filing to the 5.70 percent used in the Company's 2015 filing, the environmental discount rate should also change. In response to the Department Information Request No. 20 the Company updated the environmental discount rate to 5.70 percent and repeated the calculation. The Department agrees with the Company's re-calculation using the updated environmental discount rate.

In response to Department Information Request No. 20 (Attachment A) in this docket, Xcel indicated that it used an overall cost of capital of 6.51 percent in calculating the Value of Solar. The 6.51 percent differs from the Company's approved Weighted Average Cost of Capital of 7.45 percent from the Company's 2012 rate case that was in effect when Xcel filed the Value of Solar rate calculation on March 2, 2015. In response to further inquiry by the Department, Xcel explained that the Company adjusted the 7.45 percent "pre-tax" cost of capital to a 6.51 percent post-tax cost of capital. The Company provided the following information in support of its adjustment:

Xcel's After Tax Weighted Average Cost of Capital Adjustment Calculation

	Rate	Ratio	Pre-tax WACC	After-Tax WACC
Long Term Debt	5.02%	45.30%	2.27%	1.33%
Short Term Debt	0.68%	2.14%	0.01%	0.01%
Preferred Stock	0.00%	0.00%	0.00%	0.00%
Common Equity	9.83%	52.56%	5.17%	5.17%
Pre-tax Rate of Return			7.45%	6.51%
Tax Rate			41.37%	
After-tax Rate of Return			6.51%	

The Department notes that in the calculations of revenue requirements in riders and resource plans, the Company has appropriately used the 7.45 percent cost of capital. Since the Value of Solar methodology quantifies the value of solar resources in comparison with natural gas resources on the margin, it is appropriate to remove the portion of the cost of capital associated with taxes. The Department concludes that the Company's adjusted after-tax Weighted Average Cost of Capital of 6.51 percent is appropriate to use in the Company's Value of Solar calculation.

With the updated environmental discount rate the Department concludes that the Company's calculation of the VOS rate is correct. The resulting rate is \$0.1075/kWh in 2015. A summary of the VOS 2015 rate and projected inflation-adjusted rates in the future is attached to these *Reply Comments*.

B. RECS FROM UNSUBSCRIBED ENERGY

Not included in Xcel's tariffs is the issue of the amount Xcel should pay to community garden operators for the solar renewable energy credits ("RECs") from unsubscribed energy. The Commission determined that Xcel must pay its avoided cost rate for unsubscribed energy, and that "the solar-garden operator or developer may transfer the solar RECs to Xcel at a compensation rate of \$0.02 per kWh for solar-garden facilities with capacity greater than 250 kW and 0.03 for solar-garden facilities with capacity of 250 kW or less."¹

The Commission's Order does not distinguish between RECs from subscribed and unsubscribed energy. Xcel's Solar*Rewards Community tariff, however, identifies only subscribed energy and is silent on how the Company will compensate operators for RECs from unsubscribed energy. In its March 2, 2015 *Reply Comments* in this docket, Xcel stated that it did not ". . . find support in the Commission's April 7, 2014 Order for a requirement that Xcel pay to CSG operators a \$0.02 to \$0.03 per kWh REC payment for unsubscribed energy production . . ."

i. Xcel must pay for unsubscribed RECs

In its April 7, 2014 Order,² the Commission determined that Xcel must pay for unsubscribed energy from facilities smaller than 40 kW at the average retail energy rate, and at its avoided cost rate for unsubscribed energy from qualifying facilities larger than 40 kW.

In its September 9, 2010 Order in Docket E002/M-08-440³ (the Silent REC docket), the Commission determined that for power purchase agreements (PPAs) entered into prior to the establishment of Minnesota's Renewable Energy Standard (RES), which were silent on the disposition of RECs, and in which Xcel paid generators its avoided cost of energy, the RECs were awarded to the generator. Given this Commission finding in the Silent REC docket, the Department concludes that the Commission clearly has determined that the RECs resulting from unsubscribed energy are awarded to the Community Solar Garden ("CSG") owner, unless Xcel purchases those RECs.

ii. The Commission has not distinguished the price Xcel must pay for subscribed or unsubscribed RECs

The Commission's April 7, 2014 Order point 10 directing Xcel to purchase solar RECs at \$0.02 or 0.03 per kWh does not distinguish between RECs from unsubscribed and

¹ In the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of its Proposed Community Solar Garden Program, *Order Rejecting Xcel's Solar-Garden Tariff Filing and Requiring the Company to File a Revised Solar-Garden Plan*, Docket E002/M-13-867, April 7, 2014 (Xcel must pay for unsubscribed energy from facilities smaller than 40 kW at the average retail energy rate, and at its avoided cost rate for unsubscribed energy from qualifying facilities larger than 40 kW).

² *Ibid.*

³ In the Matter of Xcel Energy's Petition for a Determination of Entitlement to Renewable Attributes of Energy Purchases Pursuant to Renewable Energy Requirements, *Order Determining Ownership of Renewable Energy Credits for Power Purchase Agreements Made Pursuant to State Wind and Biomass Statutes and the Federal Public Utility Regulatory Policy Act*, September 9, 2010, Docket No. E002/M-08-440.

subscribed energy. Absent a Commission decision to make such a distinction, solar REC prices apply to both subscribed and unsubscribed energy RECs. If, however, the Commission wishes to make such a distinction, the Department offers three options for the purchase of unsubscribed RECs for the Commission to consider: 1) establish a different price for unsubscribed RECs, 2) require solar operators to obtain an active account with the Midwest Renewable Energy Tracking System (M-RETS) and require Xcel to transfer unsubscribed RECs to the solar operator for their use or sale in the REC market; or, 3) allow solar garden operators to determine whether to retain the RECs or to sell them to Xcel. Of these three options, the Department recommends that solar operators be given the option of receiving payment from Xcel for their unsubscribed RECs or having the RECs transferred to an M-RETS account in the operator's name.

With respect to the establishment of an M-RETS account, the Commission's September 17, 2014 Order in this Docket⁴ requires solar garden operators to maintain an active account with M-RETS in order to receive RECs associated with unsubscribed energy. With an active M-RETS account, Xcel would be able to transfer RECs associated with unsubscribed energy to the solar developers for their use or sale in the REC market. The Department notes that M-RETS has reduced its subscription fees for smaller account holders to make it more economically feasible for smaller projects to participate in M-RETS (see Attachment A for current fee structure). In addition, the Department is aware that opportunities to aggregate smaller projects into a single M-RETS account are available. Consequently, if the Commission wishes to distinguish between subscribed and unsubscribed energy RECs, the Department recommends solar developers be allowed to determine whether to establish an M-RETS account to take ownership of its unsubscribed RECs or to receive payment for those RECs from Xcel.

*C. RECS FROM SOLAR GARDENS RECEIVING MADE IN MINNESOTA OR SOLAR*REWARDS INCENTIVES*

Xcel's tariff is silent on the treatment of RECs from small gardens in years 11 through 25 of CSG operating contracts. Community solar gardens under 40 kW may be eligible for Made in Minnesota payments, and gardens under 20 kW may receive Solar*Rewards Incentive payments. Community solar gardens meeting these capacity requirements must apply for the incentives through the program's application system like other PV systems. Payments under these programs entitle Xcel to receive the community solar garden's RECs for 10 years.

The Company's Solar*Rewards Community tariff is silent on the treatment of RECs from these small gardens in years 11 through 25 of the garden's operating contract. The Department offers three options for the Commission to consider: 1) make clear that the Commission's previously-set solar REC prices apply for RECs generated by solar gardens receiving incentives after year 10; 2) require solar garden operators to obtain an active account with the Midwest Renewable Energy Tracking System (M-RETS) and require Xcel to

⁴ In the Matter of Xcel Energy's Petition for a Determination of Entitlement to Renewable Attributes of Energy Purchases Pursuant to Renewable Energy Requirements, *Order Approving Solar Garden Plan with Modifications*, Docket E002/M-13-867, September 17, 2014.

transfer RECs to the solar operator for their use or sale in the REC market; or, 3) allow the solar garden operator to determine whether to retain the RECs or sell them to Xcel.

The issue of REC payments to these solar gardens once the incentive programs end has been briefly discussed in the Solar Implementation Workgroup. The Department does not believe further discussions of such payments are warranted given the relatively small number and smaller size of these solar gardens. The Department recommends that the Commission make clear that the small solar garden operator be given the option of receiving a \$0.03 per kWh REC payment from Xcel for RECs generated in years 11 through 25, or having the RECs transferred to an M-RETS account in the operator's name.

The Department requests that the Commission make a determination on this issue in order to avoid any ambiguity for these small gardens.

D. DETERMINATION OF AN APPLICATION'S COMPLETENESS

The Department is concerned that apparently a number of CSG applications have not been deemed complete by Xcel even several months after submission. When Xcel filed its initial community solar garden plan with the Commission, the Company and other parties were concerned about Xcel's ability to process a large number of applications when the program opened. To address this concern, the Commission established the "first-ready, first-served" application review process in its April 7, 2014 Order in this docket. The first-ready, first-served approach was designed to elicit higher-quality applications by focusing applicants on the statutory criteria, as well as practical requirements such as site control that ensure that the developer is serious about proceeding with the project. Xcel incorporated the Commission's first-ready, first-served criteria in the following portion of its Section 9 tariff governing community solar gardens:

[S*RC] Applications are considered submitted (and will advance to engineering review) once the applicant furnishes all requested documents and information in the Solar*Rewards Community online application system, including:

- (i) a. the applicant's contact information,
b. garden information including system location and specifications,
c. application fee and deposit,
d. engineering documents, including one-line diagrams, site plan, and Interconnection Application;
- (ii) The applicant has submitted evidence the project has obtained or arranged appropriate insurance or has entered into an insurance broker agreement;
- (iii) The applicant has submitted evidence of control of the Community Solar Garden site;

- (iv) The applicant has submitted evidence of projected subscription at the time of construction;
- (v) The applicant has submitted evidence the project proposal complies with all applicable material terms of the tariff and standard contract and any additional considerations that the Company, solar garden developers, the Minnesota Department of Commerce, the Office of the Attorney General, and interested parties participating in the workgroup have agreed to include in the plan; and
- (vi) The applicant has submitted signed agreements, including Standard Contract for Solar*Rewards Community and the Interconnection Agreement.

Once the operator's application has been submitted according to step (i), the Company will determine its completeness within thirty (30) days for purposes of advancing for engineering review. The Company will approve or reject an operator application within sixty (60) days of determining completeness unless the applicant has agreed to an extension. Where the Company has timely rejected an application, the Company will allow the applicant to provide additional documents or information and the sixty (60) day timeframe will begin anew for the Company to accept or reject the application.

Xcel's tariff language states that the Company will determine completeness within thirty (30) days for purposes of advancing for engineering review. On January 22, 2015, the Company filed a letter in this docket updating the Commission on the Solar*Rewards Community status. In the letter the Company announced that the first set of applications was deemed complete and these projects were advancing. They also notified the Commission that other projects were not moving forward yet due to application deficiencies. The Company stated:

The application deficiencies we have identified fall into these general categories:

- Improper placement of gardens behind existing service,
- Lack of separate service for each 1 MW garden,
- Omitted production meters,
- Omitted grounding transformer specifications,
- Improper placement of external utility disconnect switches,
- Improper placement of customer owned facilities; and

- Primary meter design deficiencies.

The Department concludes from Xcel's description of application deficiencies that many such deficiencies reflect design issues that are engineering in nature and, thus, are better addressed in the preliminary engineering review step of the Section 10 interconnection process rather than in the program application completeness-determination step. Neither the Commission's Order or Xcel's tariff regarding application completeness contemplate an exhaustive, time-intensive review of a garden's design and engineering documents; rather, completeness is determined by the submittal of information listed in step (i) on sheet 67 of Xcel's Section 9 tariff. If a thorough review of engineering documents was the intent of a completeness review, it is unclear why there is a detailed timeline provided in the Section 10 tariff for project interconnection engineering review, including an additional 20 to 90 working days for specialized engineering studies, if needed. As projects do not enter the Section 10 tariff interconnection process until they are deemed complete per the Section 9 tariff, some projects have undergone significant delays. For example, the Department is aware that some community solar applications submitted in December 2014 still are not yet deemed complete by the Company. A technical review under Section 9 beyond the requirements in (1) above, is both unnecessary and redundant. Technical review of the nature described in Xcel's comments belongs under Section 10 and should not be used to delay reaching "deemed complete" status.

The Department recommends the Commission direct Xcel to identify each instance in which an application was deemed incomplete or otherwise returned to the applicant for additional information, the additional information being sought from the applicant, and the amount of additional time taken for processing the application as part of the Company's monthly CSG updates to the Commission.

E. INTERCONNECTION PROCESS

The very slow pace of Xcel's interconnection process is another area of the Department's concerns. Once a community solar garden application is deemed complete it enters Xcel's Section 10 tariff interconnection process. Xcel's Section 10 tariff covers the interconnection process for all types of generation systems that are rated 10 MW or less of total generation nameplate capacity; are planned for interconnection with Xcel; are not intended for wholesale transactions; and aren't anticipated to affect the transmission system.⁵ The Section 10 tariff was developed in response to the Commission's 2004 *Order in the Matter of Establishing Generic standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities*.⁶

⁵ Xcel Energy's Distributed Resources Tariff, Section No. 10, Original Sheet No. 83.

⁶ Docket No. E999/CI-01-1023, September 28, 2004 Order Establishing Standards.

Xcel's Section 10 tariff contains an 11 step process for interconnection.⁷ Step 1 requires the Applicant to supply Xcel with:

- 1) Completed Generation Interconnection Application, including;
 - a. One-line diagram showing;
 - i. Protective relaying.
 - ii. Point of Common Coupling.
 - b. Site plan of the proposed installation.
 - c. Proposed schedule of the installation.
- 2) Payment of the application fee.

Step 2 is a preliminary review by Xcel. Step 2 states that within 15 business days of receipt of all the information listed in Step 1 (above), the Xcel Energy Generation Interconnection Coordinator shall respond to the Applicant with the following information:

- 1) A single point of contact with Xcel Energy will be designated for this project. (Generation Interconnection Coordinator)
- 2) Approval or rejection of the generation interconnection request.
 - a) Rejection - Xcel Energy shall supply the technical reasons, with supporting information, for rejection of the interconnection Application.
 - b) Approval - An approved Application is valid for 6 months from the date of the approval. The Generation Interconnection Coordinator may extend this time if requested by the Applicant
- 3) If additional specialized engineering studies are required for the proposed interconnection, the following information will be provided to the Applicant. Categories which may require additional study are noted in the Generation Interconnection Application Fees table in Step 1. Typical Engineering Studies are outlined in Appendix D.
 - a) General scope of the engineering studies required.
 - b) Estimated cost of the engineering studies.
 - c) Estimated duration of the engineering studies.
 - d) Additional information required to allow the completion of the engineering studies.
 - e) Study authorization agreement.
- 4) Comments on the schedule provided.
- 5) If the rules of MISO (Midcontinent Independent System Operator) require that this interconnection request be processed through the MISO process, the Generation Interconnection Coordinator will notify the Applicant that the

⁷ Process for Interconnection begins on Section No. 10, Original Sheet No. 92 of Xcel's Section 10 tariff.

generation system is not eligible for review through the State of Minnesota process.

The tariff also states that if the information required in Step 1 is not complete, the Applicant will be notified, within 10 business days, of what is missing and no further review will be completed until the missing information is submitted. The 15-day clock will restart with the new submittal.

Regarding Steps 1 and 2, the Department is generally aware that some solar garden developers believe there are problems and delays surrounding Step 2. The Department has issued discovery seeking detailed response from Xcel as to the following questions:

1. Whether Xcel is requiring additional information not listed in Step 1 of the tariff;
2. Whether Xcel is restarting the 15-day clock when Xcel requests that the Applicant submit additional information not listed in Step 1 of the tariff;
3. Whether Xcel is waiting longer than 10 business days to notify applicants that the Step 1 information is not complete; and
4. Whether Xcel has waited the full 15 days before informing the developer that additional or different information is needed.

Step 3 is the go – no go decision for engineering studies by applicant. In Step 3 the applicant decides whether or not to proceed with the required engineering studies scoped by the Company in Step 2. If the applicant decides to proceed and specialized engineering studies are required, the applicant must make a payment to Xcel for the engineering studies.

Step 4 is the engineering study by Xcel. Upon receipt of written notice to proceed, payment of applicable fee, and receipt of all engineering study information required by Xcel in step 2, the Company shall initiate the engineering studies. The Department interprets the Step 4 tariff language on sheet no. 95 of the Section 10 tariff to mean that the start of the engineering study completion timeline listed on sheet no. 95 *begins upon receipt of payment and information required in Step 2*. The Department requests that the Company detailed response in reply comments on its method of meeting the engineering study completion timeline

As of late March 2015, no S*CG application had completed Step 4 of the interconnection process.⁸

Finally, the Department has heard concerns from developers with applications in a queue at a particular substation that their project may be subject to delay if a project ahead of them in the queue experiences delays. The Department recommends that Xcel be ordered to submit a compliance filing detailing how it will process interconnection requests for all projects in a queue when a project at the head of the queue experiences delays.

⁸ Xcel's response to the Department's Information Request No. 22. (Attachment B)

Given the very slow pace of Xcel's interconnection process, it is possible that no community solar gardens will be operating by the end of the year. The Department requests that the Company respond with specificity to the Department's understanding of interconnection process problems in subsequent comments.

III. DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission:

- Find that Xcel's calculation of the Value of Solar is correct;
- Find that Xcel must pay for RECs from unsubscribed energy at a rate to be determined by the Commission;
- Require Xcel to pay \$0.03 per kWh for RECs from Solar Gardens receiving Made in Minnesota or Solar*Rewards Incentives in years 11 through 25 of the contract;
- Within 10 days of the Commission's Order in this proceeding, require Xcel to submit a detailed explanation of how it will process DG applications when multiple applicants are queued behind a project that is not proceeding in a timely fashion;
- As part of the Company's monthly CSG updates, require Xcel to:
 1. identify each instance in which an application was deemed incomplete or otherwise returned to the applicant for additional information, the additional information being sought from the applicant, and the amount of additional time taken for processing the application as part of the Company's monthly CSG updates to the Commission; and
 2. Identify each instance in which the Company did not meet a Section 10 tariff interconnection process timeline, or otherwise restarted the timeline (i.e., if the process grants Xcel 15 days for preliminary engineering review, and the Company requests additional information from the applicant on day 14, the time permitted for review is reset for another 15 days at that point), and the reason for not meeting/restarting the timeline.

/lt

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. E002/M-13-867

Dated this 1st day of May 2015

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	abbey@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 220 St. Paul, MN 55102-1125	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Ross	Abbey	ross@mysunshare.com	SunShare, LLC	609 S. 10th Street Suite 210 Minneapolis, MN 55404	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
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	No	SPL_SL_13-867_Community Solar Garden - Xcel
Sara	Baldwin Auck	N/A	Interstate Renewable Energy Council, Inc.	PO Box 1156 Latham, NY 12110-1156	Paper Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
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Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
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Joel	Cannon	jcannon@tenksolar.com	Tenk Solar, Inc.	9549 Penn Avenue S Bloomington, MN 55431	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
John J.	Carroll	jcarroll@newportpartners.com	Newport Partners, LLC	9 Cushing, Suite 200 Irvine, California 92618	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Landscapes	234 Jackson Ave N Hopkins, MN 55343	Electronic Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel
Dustin	Denison	dustin@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Electronic Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel
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	Electronic Service 1400	Yes	SPL_SL_13- 867_Community Solar Garden - Xcel
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John	Farrell	jfarrell@ilsr.org	Institute for Local Self- Reliance	1313 5th St SE #303 Minneapolis, MN 55414	Electronic Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Timothy	Gulden	info@winonarenewableenergy.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Duane	Hebert	N/A	Novel Energy Solutions	1628 2nd Ave SE Rochester, MN 55904	Paper Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Lynn	Hinkle	lhinkle@mnseia.org	Minnesota Solar Energy Industries Association	2512 33rd Ave South #2 Minneapolis, MN 55406	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jim	Horan	Jim@MREA.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
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Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

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	SPL_SL_13-867_Community Solar Garden - Xcel
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Rebecca	Lundberg	rebecca.lundberg@powerfullygreen.com	Powerfully Green	11451 Oregon Ave N Champlin, MN 55316	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Casey	MacCallum	casey@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Erica	McConnell	emcconnell@kfwlaw.com	Keyes, Fox & Wiedman LLP	436 14th Street, Suite 1305 Oakland, California 94612	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Martin	Morud	mmorud@trunorthsolar.com	Tru North Solar	5115 45th Ave S Minneapolis, MN 55417	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	7301 Ohms Ln Ste 325 Edina, MN 55439	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Donna	Pickard	dpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Dan	Rogers	drogers@sunedison.com	SunEdison	N/A	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129 St. Paul, MN 55116	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jason	Willett	jason.willett@metc.state.mn.us	Metropolitan Council	390 Robert St N Saint Paul, MN 55101-1805	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Daniel	Williams	DanWilliams.mg@gmail.com	Powerfully Green	11451 Oregon Avenue N Champlin, MN 55316	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel