

**STATE OF MINNESOTA  
PUBLIC UTILITIES COMMISSION**

Beverly Jones Heydinger	Chair
David Boyd	Commissioner
Nancy Lange	Commissioner
J. Dennis O'Brien	Commissioner
Betsy Wergin	Commissioner

**In the Matter of Implementation of Solar  
Energy Standards Pursuant to the 2013 Amendments  
to Minnesota Statutes Section 216B.1691**

**Docket No. E999/CI-13-542**

**INITIAL COMMENTS OF ENVIRONMENTAL LAW  
AND POLICY CENTER, FRESH ENERGY,  
AND IZAAK WALTON LEAGUE OF AMERICA**

On May 23, 2013, the Governor signed HF 729, the Solar Energy Jobs Act, which, among other things, enacted Minn. Stat. § 216B.1691 Subdivision 2f, the state's new solar energy standard ("SES") for public utilities. On December 30, 2013, the Commission issued a Notice inviting comments on four questions related to the implementation of the SES.

Fresh Energy is a 501(c)(3) non-profit organization based in St. Paul working for a clean, fair and efficient energy system through good public policy. Fresh Energy was an active participant in the development of the solar energy legislation enacted in 2013, including the SES. In support of this legislation, Fresh Energy worked closely with the Clean Energy and Jobs Campaign, a coalition comprised of sixty citizen, outdoor recreation, rural, conservation, labor, faith, student, and business groups.

The Environmental Law and Policy Center ("ELPC") is a 501(c)(3) non-profit regional public interest environmental organization with staff located in seven Midwest states, including Minnesota, and is also a member of the Clean Energy and Jobs Campaign. ELPC's goals include promoting clean energy development and advocating for policies and practices that facilitate the use and development of clean energy.

The Izaak Walton League of America ("IWLA") is a national nonprofit 501(c)(3) conservation organization committed to protecting fish and wildlife, critical habitat, air, and water resources. IWLA has local chapters throughout the Midwest, including Minnesota. The Midwest Office of the IWLA, located in St. Paul, works on energy and air quality issues in an effort to conserve, restore, and promote the sustainable use and enjoyment of our natural resources.

## COMMENTS

We appreciate that the Commission initiated this docket (along with its companion docket, 13-720), as a way to gather stakeholder input into a number of important questions. Careful implementation of the SES program, including consideration of solar renewable energy credit (“SREC”) development in light of the state’s current renewable energy credit (“REC”) program, will help ensure that uniform standards apply across all effected utilities.

### **1. Should the Commission issue any clarifications on SREC shelf life?**

Yes. The SES appears to clearly establish that SRECs generated by equipment installed during the period between August 31, 2013, and January 1, 2020, may count towards the SES 2020 compliance requirement.<sup>1</sup> But the SES does not explicitly spell out what happens to SRECs from equipment installed during that time period that are not applied to the 2020 compliance requirement. Can those SRECs live on forever, or do they have a shelf life after 2020?

We believe that clarification on this point may be necessary to reduce ambiguity and uncertainty for SREC generators and buyers in the pre-2020 timeframe, since the post-2020 treatment of "excess" SRECs (*i.e.*, any SRECs in surplus of the 2020 requirement) will inform the value of those SRECs at the pre-2020 time of generation.

We do not, at the present time, have a specific recommendation for what this clarification should be. As a general matter, however, we believe it is important to adopt rules that will drive increased solar installations and allow for and/or encourage near-term (pre-2020) SREC generation in excess of the 2020 compliance requirement. The Commission should also assign some “shelf-life” period to all eligible SRECs, as an unlimited shelf-life could frustrate the purpose of the SES: driving increased solar installations. Whatever SREC "shelf life" or other limitations on usage the Commission puts in place should also consider and support the value of SRECs in a voluntary and/or secondary SREC market.

In its deliberations, the Commission should also be mindful of the potential scenario in which the legislature establishes an additional, post-2020 SES compliance obligation.<sup>2</sup>

### **2. Should the Commission issue a clarification on the compliance enforcement provision’s application to the SES?**

Yes. The Commission should clarify that 216B.1691’s compliance enforcement provision in Subd. 7 does apply to the SES.

The legislature plainly intended that the provisions governing Minnesota’s RES also apply to the SES. Subd. 2f(b) states that “[t]he solar energy standard established in this subdivision is subject to all the provisions of this section governing a utility’s standard obligation

---

<sup>1</sup> Minn. Stat. 216B.1691, Subd. 2f(f).

<sup>2</sup> For example, to help meet the state's “energy goal [that] by 2030, ten percent of the retail electric sales in Minnesota be generated by solar energy.” Minn. Stat. 216B.1691, Subd. 2f(c).

under subdivision 2a.” (Emphasis added.) The phrase “this section” refers to section 216B.1691 (*i.e.*, the statutory section in which Subd. 2f(b) is located). Thus, all of the provisions that “govern” utility RES obligations (*i.e.*, subdivision 2a obligations) under section 216B.1691 also apply to utility SES obligations, if logically relevant and not overridden by the provisions within Subd. 2f.<sup>3</sup>

Subd. 2f(b) is thus structured as a catch-all provision, making it unnecessary for the legislature to also amend the compliance provisions in Subd. 7 to add a specific reference to the new SES obligations. Subd. 7 is plainly a “provision,” of section 216B.1691 “governing . . . subdivision 2a,” as Subd. 7 states that “[t]he commission must regularly investigate whether an electric utility is in compliance with its . . . standard obligation under subdivision 2a.” Therefore, Subd. 7 is covered by Subd. 2f(b)’s catch-all provision.

It also makes practical sense that the legislature intended to provide a compliance mechanism for the SES. The fact that the legislature included a compliance mechanism for the RES indicates that it believes an enforcement mechanism is a necessary component for an energy standard. Therefore, it makes sense that the legislature would include an enforcement provision for the SES, especially because it is modeled after the RES. Whereas a failure to include an enforcement mechanism for the SES would frustrate legislative intent, including such a mechanism would ensure that covered utilities will “generate or procure . . . at least 1.5 percent” of the utility’s relevant energy sales from solar energy,<sup>4</sup> thereby ensuring that legislative intent is fulfilled.

Therefore, the Commission should affirm that Subd. 7 applies to the SES.

### **3. What information should be provided in the utilities’ annual reports on the SES?**

Thanks to the legislative decision to require utilities to report annually on their progress towards the Solar Energy Standard (rather than bi-annually, as for the RES), we look forward to reviewing the first SES compliance reports in summer 2014.<sup>5</sup>

As a starting point, the information listed in Attachment 1, question 3(b) is a good list of information to include in the annual report. In general, we are satisfied with the general categories of information provided in the bi-annual RES reports.

There are, however, important differences between the SES and the RES that are relevant to reporting.

First, unlike the RES, the SES contains a 10 percent carve out for solar photovoltaic (“PV”) systems sized under 20 kW.<sup>6</sup> For this reason, utilities must separately track small-system

---

<sup>3</sup> For example, the bi-annual reporting requirement in Subd. 3 is overridden, as to the SES, by the annual reporting provision in Subd. 2f(g).

<sup>4</sup> Minn. Stat. 216B.1691 Subd. 2f(a).

<sup>5</sup> Minn. Stat. 216B.1691 Subd. 2f(g).

<sup>6</sup> Minn. Stat. 216B.1691 Subd. 2f(a).

SRECs and report on their progress towards compliance with both the 10 percent carve out and the overall SES goal.

Second, there are relevant differences between the types of technology deployed and the installation location for SES- and RES-eligible resources, as described below. Additionally, for the SES, some of the eligible distributed generation systems must be installed behind the meter while the RES does not have the same interconnection distinction (with the exception of some net-metered wind systems under 40kW in size). As compared to utility-scale wind, solar PV projects are generally much smaller and much more numerous.

In terms of size, the Commission should expect to see projects ranging in size from the distributed generation maximum (10 MW) or larger, all the way down to 2 kW (*e.g.*, small residential rooftop system). To enable the Commission to effectively evaluate SES policy progress and solar market development, utilities should report relevant data separately for each relevant solar project category (potential categories are discussed further below.) Utilities should also comment in the report on the anticipated mix of project sizes that will be used for SES compliance.

For example, data could be broken out by contract type (net metering, value-of-solar tariff, community solar garden, utility owned, power purchase agreement) and by project capacity. Additionally, it may be important to separately track various project sizes, such as projects under 20 kW (*i.e.*, within the SES small-system carve out), from 20 kW to 1 MW (*e.g.*, net metering, solar tariff, or community solar projects), and above 1 MW. Our state may also see central station (“utility scale”) solar projects, which may be relatively more analogous to utility-scale wind projects under the RES.

As stated, solar PV projects are also much more numerous than wind projects. One consequence, from a regulatory perspective, is that the market can and will generate many more data points for analysis. Leading solar states, such as Massachusetts, have developed systems to collect and analyze policy-relevant project-level data (*e.g.*, zip code, installed system costs, and project structure *i.e.*, customer-sited versus community solar). This approach allows regulators and policy makers to closely observe their state’s fast-developing solar markets and identify cost-increasing barriers to deployment in a way that respects the legitimate privacy and competition concerns of market participants. The Commission may wish to include some of these data points among its reporting requirements for utilities.

Third, in solar contracts, the generator is often, though not always, a utility customer-ratpayer or possibly a contracting third-party owner. For many solar PV customer-generators (including those operating under Minnesota's net metering policy, which was recently strengthened by the state legislature<sup>7</sup>), the solar PV generation is also situated on the customer side of the meter. These differences may raise additional considerations not addressed under traditional RES reporting.

---

<sup>7</sup> See 2013 amendments to Minn. Stat. 216B.164 Subd. 3a.

**4. Should the Commission authorize an additional tracking system to track compliance with the SES?**

We have no comment, at this time, on the need for an additional tracking system. This being said, we recognize that the Commission, in its deliberations in this proceeding, should consider the Midwest Renewable Energy Tracking System (M-RETS) currently in use for Minnesota's RES compliance and REC tracking.

At the same time, because the SES is a separate compliance obligation from the RES with a separate compliance mechanism (SRECs), the Commission should ensure that any tracking system approved can confirm the validity of SRECs within a larger compliance tracking system. In particular, a tracking system must be able to accurately track SES compliance, including compliance with the small-system carve out, and also accommodate the participation of small generators through no or low transaction costs.

We appreciate the opportunity to provide these initial comments to the Commission.

Very truly yours,

/s/ Ross Abbey  
Ross Abbey  
Policy Associate,  
Fresh Energy  
408 St. Peter Street,  
St. Paul, MN 55102  
(651) 294-7144  
abbey@fresh-energy.org

/s/ Allen Gleckner  
Allen Gleckner  
Staff Attorney,  
Environmental Law & Policy Center  
2356 University Ave W, Suite 403  
St. Paul, MN 55114  
(651) 789-1407

/s/ Eric Jensen  
Eric Jensen  
Energy Associate  
Izaak Walton League of America  
– Midwest Office  
1619 Dayton Avenue, Suite 202  
Saint Paul, MN 55104  
(651) 649-1446

STATE OF MINNESOTA  
FOR THE PUBLIC UTILITIES COMMISSION

---

In the Matter of Implementation of Solar  
Energy Standards Pursuant to the 2013  
Amendments to Minnesota Statutes Section  
216B.1691

**AFFIDAVIT OF SERVICE**

MPUC Docket No. E999/CI-13-542

---

STATE OF MINNESOTA    )  
  )ss.  
COUNTY OF RAMSEY    )

Leah Harms being duly sworn, says that on the 31<sup>st</sup> day of January, 2014 she served via U.S. mail and e-dockets the following:

- Initial Comments of Environmental Law and Policy Center, Fresh Energy, and Izaak Walton League of America

on the following persons, in this action, by filing through e-dockets or mailing to them a copy thereof, enclosed in an envelope, postage prepaid, and by depositing the same in the post office at St. Paul, Minnesota, directed to said persons at the last known mailing address of said persons:

Attached Service List.

/s/ Leah Harms  
\_\_\_\_\_  
Leah Harms

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_13-542_Interested Parties
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211  Minneapolis, Minnesota 55405	Electronic Service	No	SPL_SL_13-542_Interested Parties
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	SPL_SL_13-542_Interested Parties
John	Aune	johna@bluehorizonsolar.com	Blue Horizon Energy	7246 Washington Ave S  Eden Prairie, MN 55344	Paper Service	No	SPL_SL_13-542_Interested Parties
Peter	Beithon	pbeithon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_13-542_Interested Parties
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13-542_Interested Parties
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	SPL_SL_13-542_Interested Parties
Michael J.	Bull	N/A	Center for Energy and Environment	212 Third Avenue North, Suite 560  Minneapolis, MN 55401	Paper Service	No	SPL_SL_13-542_Interested Parties
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_13-542_Interested Parties
Joel	Cannon	jcannon@tenksolar.com	Tenk Solar, Inc.	9549 Penn Avenue S  Bloomington, MN 55431	Electronic Service	No	SPL_SL_13-542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John J.	Carroll	jcarroll@newportpartners.com	Newport Partners, LLC	9 Cushing, Suite 200  Irvine, California 92618	Electronic Service	No	SPL_SL_13-542_Interested Parties
Steve W.	Chriss	Stephen.chriss@wal-mart.com	Wal-Mart	2001 Southeast 10th St.  Bentonville, AZ 72716-5530	Paper Service	No	SPL_SL_13-542_Interested Parties
Steve	Coleman	scoleman@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S  Minneapolis, MN 55406	Paper Service	No	SPL_SL_13-542_Interested Parties
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Avenue  Minneapolis, MN 55403	Paper Service	No	SPL_SL_13-542_Interested Parties
Chris	Davis	christopher.davis@state.mn.us	Department of Commerce	Suite 500 85 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	SPL_SL_13-542_Interested Parties
Dustin	Denison	dustin@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S  Minneapolis, MN 55406	Electronic Service	No	SPL_SL_13-542_Interested Parties
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	Yes	SPL_SL_13-542_Interested Parties
Dan	Donkers	N/A	Saint Paul - Ramsey County Public Health	Environmental Health Section 2785 White Bear Ave. Suite 350 Maplewood, MN 55109	Paper Service	No	SPL_SL_13-542_Interested Parties
Bill	Doessler	N/A	Izaak Walton League of America-MWO	1619 Dayton Ave Ste 202  Saint Paul, MN 55104	Paper Service	No	SPL_SL_13-542_Interested Parties



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	SPL_SL_13-542_Interested Parties
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_13-542_Interested Parties
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	SPL_SL_13-542_Interested Parties
Benjamin	Gerber	bgerber@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	SPL_SL_13-542_Interested Parties
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_13-542_Interested Parties
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Electronic Service	No	SPL_SL_13-542_Interested Parties
Bill	Grant	Bill.Grant@state.mn.us	Minnesota Department of Commerce	85 7th Place East, Suite 500  St. Paul, MN 55101	Electronic Service	No	SPL_SL_13-542_Interested Parties
Lloyd	Grooms	lgrooms@winthrop.com	Winthrop and Weinstine	Suite 3500 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_13-542_Interested Parties
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	SPL_SL_13-542_Interested Parties
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL_13-542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St  Saint Paul, MN 55101	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Samuel	Hanson	N/A	Briggs And Morgan, P.A.	2200 IDS Center E 80 South Eighth Street Minneapolis, MN 55402	Paper Service	No	SPL_SL_13- 542_Interested Parties
Jack	Hays	jack.hays@westwoodps.com	Westwood Professional Services	7699 Anagram Drive  Eden Prairie, MN 55344	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Brandon	Heath	bheath@misoenergy.org	MISO Energy	1125 Energy Park Drive  St. Paul, MN 55108-5001	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Lynn	Hinkle	lhinkle@mnseia.org	Minnesota Solar Energy Industries Association	2512 33rd Ave South #2  Minneapolis, MN 55406	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 6th Floor  Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Margaret	Hodnik	mhodnik@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Jan	Hubbard	Jan@AppliedEnergyInnovations.org	Applied Energy Innovations, LLC	4000 Minnehaha Avenue South  Minneapolis, MN 55406	Paper Service	No	SPL_SL_13- 542_Interested Parties
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of Saint Paul	390 City Hall 15 West Kellogg Boulevard  Saint Paul, MN 55102	Electronic Service	No	SPL_SL_13- 542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ralph	Jacobson	N/A	Innovative Power Systems, Inc.	1413 Hunting Valley Rd Ste 1  Saint Paul, MN 55109-1555	Paper Service	No	SPL_SL_13-542_Interested Parties
Dwight	Jelle	dkjelle@gmail.com	Best Power International, LLC	P.O. 5126  Hopkins, MN 55343	Electronic Service	No	SPL_SL_13-542_Interested Parties
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	SPL_SL_13-542_Interested Parties
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street  St. Paul, MN 551012134	Electronic Service	No	SPL_SL_13-542_Interested Parties
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	90 South 7th Street Suite #4800 Minneapolis, MN 554024129	Electronic Service	No	SPL_SL_13-542_Interested Parties
Mara	Koeller	mara.n.koeller@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-542_Interested Parties
Jon	Kramer	jk2surf@aol.com	Sundial Solar	4708 york ave. S  Minneapolis, MN 55410	Electronic Service	No	SPL_SL_13-542_Interested Parties
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl  Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-542_Interested Parties
Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_13-542_Interested Parties
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	SPL_SL_13-542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bob	Long	rlong@larkinhoffman.com	Larkin Hoffman (Silicon Energy)	1500 Wells Fargo Plaza 7900 Xerxes Ave S Bloomington, MN 55431	Paper Service	No	SPL_SL_13- 542_Interested Parties
Rebecca	Lundberg	rebecca.lundberg@powerfullygreen.com	Powerfully Green	11451 Oregon Ave N  Champlin, MN 55316	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Paula	Maccabee	Pmaccabee@justchangela w.com	Just Change Law Offices	1961 Selby Avenue  St. Paul, MN 55104	Paper Service	No	SPL_SL_13- 542_Interested Parties
Casey	Maccullum	casey@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S  Minneapolis, MN 55406	Paper Service	No	SPL_SL_13- 542_Interested Parties
Susan	Mackenzie	susan.mackenzie@state.mn.us	Public Utilities Commission	Suite 350121 7th Place East  St. Paul, MN 551012147	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201  St. Paul, MN 55104-1850	Paper Service	No	SPL_SL_13- 542_Interested Parties
Brian	Millberg	Brian.Millberg@minneapolismn.gov	City of Minneapolis	350 South 5th St, #315  Minneapolis, MN 55415	Paper Service	No	SPL_SL_13- 542_Interested Parties
Stacy	Miller	stacy.miller@state.mn.us	Department of Commerce	State Energy Office 85 7th Place East, Suite 500  St. Paul, MN 55101	Electronic Service	No	SPL_SL_13- 542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Martin	Morud	mmorud@trunorthsolar.com	Tru North Solar	5115 45th Ave S  Minneapolis, MN 55417	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220  Minneapolis, MN 55407-1229	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Kate	O'Connell	kate.oconnell@state.mn.us	Department of Commerce	Suite 50085 Seventh Place East  St. Paul, MN 551012198	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Donna	Pickard	dpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane  Excelsior, MN 55331	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Charlie	Pickard	cpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane  Excelsior, MN 55331	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315  Minneapolis, MN 55415	Paper Service	No	SPL_SL_13- 542_Interested Parties
Kent	Ragsdale	kentragdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_13- 542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Enio	Ricci	ericci@invenergyllc.com	Invenergy LLC	17830 New Hampshire Ave Ste 300  Ashton, MD 20861	Paper Service	No	SPL_SL_13- 542_Interested Parties
Michelle	Rosier	michelle.rosier@sierraclub.org	Sierra Club	2327 E. Franklin Avenue  Minneapolis, MN 554061024	Paper Service	No	SPL_SL_13- 542_Interested Parties
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137  Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129  St. Paul, MN 55116	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Gary	Shaver	N/A	Silicon Energy	3506 124th St NE  Marysville, WA 98271	Paper Service	No	SPL_SL_13- 542_Interested Parties
Erin	Shea	bademaileshea@silicon-energy.com	Silicon Energy	11168 Sumter Circle  Bloomington, MN 55438	Paper Service	No	SPL_SL_13- 542_Interested Parties
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Avenue South  Minneapolis, MN 55408	Paper Service	No	SPL_SL_13- 542_Interested Parties
Chanti	Sourignavong	chantipal.sourignavong@honeywell.com	Honeywell	1985 Douglas Drive North MN10-111A Golden Valley, MN 55422-3992	Paper Service	No	SPL_SL_13- 542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Erin	Stojan Ruccolo	ruccolo@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 220 Saint Paul, MN 55102-1125	Electronic Service	No	SPL_SL_13- 542_Interested Parties
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Deb	Sundin	deb.sundin@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13- 542_Interested Parties
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_13- 542_Interested Parties
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- 542_Interested Parties
Daniel	Williams	DanWilliams.mg@gmail.com	Powerfully Green	11451 Oregon Avenue N Champlin, MN 55316	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_13- 542_Interested Parties