

# KEYES, FOX & WIEDMAN<sup>LLP</sup>

June 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

VIA ELECTRONIC SERVICE

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

*PUC Docket No.: E-999/CI-15-755*

Dear Mr. Wolf,

The Energy Freedom Coalition of America (“EFCA”) hereby submits its **REPLY COMMENTS OF THE ENERGY FREEDOM COALITION OF AMERICA** in the above-entitled matter.

EFCA 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 970-531-2525 or at [jschlesinger@kfwlaw.com](mailto:jschlesinger@kfwlaw.com).

Sincerely,

/s/ Jacob J. Schlesinger  
Jacob J. Schlesinger  
Keyes, Fox & Wiedman LLP  
1580 Lincoln St., Suite 880  
Denver, CO 80203  
Phone: (970) 531-2525  
[jschlesinger@kfwlaw.com](mailto:jschlesinger@kfwlaw.com)

JS/pj

Enclosure

Cc: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE COMMISSION'S INQUIRY  
INTO FEES CHARGED ON QUALIFYING FACILITIES

DOCKET No. E999/CI-15-755

**REPLY COMMENTS OF  
THE ENERGY FREEDOM  
COALITION OF  
AMERICA**

The Energy Freedom Coalition of America ("EFCA") hereby submits its Reply Comments pursuant to the State of Minnesota Public Utilities Commission's ("Commission") Notice of Comment Period ("Notice"), issued December 23, 2015 and the Notice of Extended Comment Period issued February 24, 2016.

**1. Introduction –**

To the extent replies are possible, EFCA provides specific topic-by-topic replies to initial comments below. Because only one of the six utilities with distributed generation ("DG") fees that are at issue in this Docket chose to file initial comments, only a limited response is possible. The non-utility parties that provided initial comments largely agree that none of the DG fees at issue are legal, and even if they were, none of the utilities has demonstrated that their individual fees are reasonable. Otter Tail Power ("OTP") is the only utility that filed initial comments that stakeholders can respond to. OTP makes very similar legal arguments to those made by People's Cooperative in Docket No. 15-255 and relies only on the fact that its fees were approved in a rate case to argue their reasonableness.

If other utilities choose to provide all of their rationale and support for their fees in Reply Comments in this Docket, EFCA requests that the Commission strike them as

procedurally improper. It is not fair to allow utilities to present their case-in-chief through reply comments and deny other stakeholders an opportunity to respond.

In our Initial Comments, EFCA explained that it found certain responses to the Staff IRs to be incomplete and therefore, on March 31, 2016 propounded additional discovery on each of the six utilities.<sup>1</sup> Unfortunately EFCA did not receive any response from five of the six utilities. While Xcel initially objected to providing responses to EFCA’s IRs it nevertheless provided some limited responses on May 16, 2016, which will be addressed below. At this time, none of the remaining five utilities have provided responses of any kind.

**2. 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?**

All commenters other than OTP agree that the law (at least prior to July 1, 2015) forbids all of the monthly fees at issue in this docket. The Department of Commerce (“DOC” or “Department”) states, “[t]o the extent the fees in question are found to be interconnection costs, recovery of those costs in perpetuity is not reasonable.”<sup>2</sup> DOC also points out that section 6 of the Uniform Statewide Contract does not permit utilities to impose a separate facility charge in addition to the rates contained in the retail tariff.<sup>3</sup>

The Minnesota legislature has been clear that the express purpose of the Commission in setting rates is to “give the maximum possible encouragement to cogeneration consistent with protection of the ratepayers and the public.”<sup>4</sup> This must be

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<sup>1</sup> EFCA Initial Comments at p. 6.

<sup>2</sup> DOC Comments at p. 5.

<sup>3</sup> *Id.* at p.4.

<sup>4</sup> Minn. Stat. § 216B.03.

taken into account when analyzing the statute.

Moreover, to the extent that production meters are included in a utility fee, any such costs are inappropriate for customers that don't receive a production-based incentive. are not currently required, so any production metering costs cannot be assessed unless a customer is enrolled in a utility incentive program that requires REC transfer to the utility.<sup>5</sup>

OTP, the only commenter to suggest that separate DG fees are legal, merely relies on the same arguments advanced by Peoples Cooperative in Docket No 15-255 that Section § 216B.164 Subd. 8(b) and 3(c) authorize special fixed fees for DG customers.<sup>6</sup> As EFCA pointed out in its Initial Comments neither of these provisions support OTP's position. Section 216B.164 Subdivision 3(c) concerns rates paid for "net input" back into the utility system and therefore does not concern charges levied on customers by utilities, such as fixed fees.<sup>7</sup> Similarly, Section 8(b) subdivision concerns interconnection and wheeling costs, not costs for electricity service.

While EFCA generally supports Sam Villella in his ongoing complaint against Connexus Energy ("Connexus"), we disagree with his specific statement that suggest that fees like those charged by Connexus and the other six utilities "are now allowed under state law, but they can only apply to systems installed after the effective date."<sup>8</sup> While new legislation clearly allows fixed fees in some specific, limited circumstances, EFCA disagrees that Connexus has demonstrated that its fee, even if implemented after July 1,

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<sup>5</sup> Environmental Policy Law Center, Fresh Energy and Vote Solar Comments at p. 11.

<sup>6</sup> Docket No. 15-255, People's Reply Comments, April 6, 2015.

<sup>7</sup> See, § 216B.164, Subd. 3(a) ("In the case of net metering input into the utility system by a qualifying facility . . . compensation to the customer shall be at a kilowatt-hour rate determined under paragraph (c) or (d).").

<sup>8</sup> Comments of Sam Villella, p. 7.

2015, would meet the requirements of the new statute.

- 3. 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 is reasonable?**

EFCA has no additional comments at this time.

- 4. Is the additional monthly fee imposed by Connexus Energy permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?**

Connexus did not file any Initial Comments or any reply to EFCA's IRs, and thus EFCA cannot provide any reply to Connexus at this time. If Connexus chooses to provide support for their fees in Reply Comments in this Docket, EFCA requests that the Commission strike them as procedurally improper. It is not fair to allow utilities to present their case-in-chief through reply comments and deny other stakeholders an opportunity to respond. If the Commission does intend to consider arguments and rationale provided by utilities only through reply comment, EFCA requests that the Commission provide other stakeholders an opportunity and sufficient time to respond.

- 5. 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?**

Goodhue Cooperative Electric Association ("Goodhue") did not file any Initial Comments or any reply to EFCA's IRs, and thus EFCA cannot provide any reply to Goodhue at this time. If Goodhue chooses to provide support for their fees in Reply Comments in this Docket, EFCA requests that the Commission strike them as procedurally improper. It is not fair to allow utilities to present their case-in-chief through reply comments and deny other stakeholders an opportunity to respond. If the

Commission does intend to consider arguments and rationale provided by utilities only through reply comment, EFCA requests that the Commission provide other stakeholders an opportunity and sufficient time to respond.

**6. 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?**

Mille Lacs Electric Cooperative (“Mille Lacs”) did not file any Initial Comments or any reply to EFCA’s IRs, and thus EFCA cannot provide any reply to Mille Lacs at this time. If Mille Lacs chooses to provide support for their fees in Reply Comments in this Docket, EFCA requests that the Commission strike them as procedurally improper. It is not fair to allow utilities to present their case-in-chief through reply comments and deny other stakeholders an opportunity to respond. If the Commission does intend to consider arguments and rationale provided by utilities only through reply comment, EFCA requests that the Commission provide other stakeholders an opportunity and sufficient time to respond.

**7. Is the additional monthly fee imposed by Minnesota Power permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?**

Minnesota Power did not file any Initial Comments or any reply to EFCA’s IRs, and thus EFCA cannot provide any reply to Minnesota Power at this time. If Minnesota Power chooses to provide support for their fees in Reply Comments in this Docket, EFCA requests that the Commission strike them as procedurally improper. It is not fair to allow utilities to present their case-in-chief through reply comments and deny other stakeholders an opportunity to respond. If the Commission does intend to consider arguments and rationale provided by utilities only through reply comment, EFCA

requests that the Commission provide other stakeholders an opportunity and sufficient time to respond.

**8. 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?**

OTP is the only utility that provided initial comments and the only utility that has so far put forth an argument as to why its fees are reasonable. However OTP's rationale is insufficient to find that its DG fees are reasonable even if they are deemed legal in the first place.

OTP's entire rationale for reasonableness rests on two factors. First, that the current customer charges for qualifying facilities were approved in Otter Tail's last completed general rate case, Docket No. 10-239 as part of the overall rate design approved by the Commission.<sup>9</sup> Second, OTP relies on the fact that 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.<sup>10</sup> But neither of these arguments are cost-based arguments that would justify the reasonableness of OTP's fees. In other words, just because they've been doing it, doesn't make it right. If the Commission ultimately finds that OTP's fees are illegal *or* unreasonable, OTP must cease charging it by law.

OTP does not clearly explain whether its fee was explicitly mentioned in its testimony, responses from other parties, or the decision in Docket No. 10-239. It is not clear whether the DG fee was explicitly approved in that proceeding or merely ignored and approved along with the entire tariff book. OTP also offers no explanation as to why

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<sup>9</sup> OTP Comments at p. 4.

<sup>10</sup> *Id.*

QF customers are so similarly situated to customers selecting service under the Company's water-heating control rider and off-peak electric vehicle rider to justify their application. Regardless of their prior approval or their application to non-DG customers, if the Commission now finds OTP's DG fees to be unreasonable, OTP must cease charging them per Section 216B.03.

Minnesota Statute, Section 216B.03 is unambiguous and states,

*Every rate made, demanded, or received by any public utility, or by any two or more public utilities jointly, shall be just and reasonable. Rates shall not be unreasonably preferential, unreasonably prejudicial, or discriminatory, but shall be sufficient, equitable, and consistent in application to a class of consumers. To the maximum reasonable extent, the commission shall set rates to encourage energy conservation and renewable energy use and to further the goals of sections 216B.164, 216B.241, and 216C.05. Any doubt as to reasonableness should be resolved in favor of the consumer.*

If the Commission at any time finds that a rate violates the above statute that rate must cease. OTP has not offered any cost based rationale to support their DG fees and has still not responded to EFCA IRs intended to elicit information that would enable parties to evaluate whether the fees are in fact cost based.

**9. Is the additional monthly fee imposed by Xcel Energy permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?**

Xcel did not file any Initial Comments and thus EFCA cannot provide a reply to Xcel at this time. Xcel has indicated in its responses to EFCA' IR 3, 4 and 5 that it does intend to provide additional supporting data for its DG fee in Reply Comments in this docket. If Xcel chooses to provide support for its fees in Reply Comments in this Docket, EFCA requests that the Commission strike them as procedurally improper. It is not fair to allow utilities to present their case-in-chief through reply comments and deny other stakeholders an opportunity to respond. If the Commission does intend to consider



arguments and rationale provided by utilities only through reply comment, EFCA requests that the Commission provide other stakeholders an opportunity and sufficient time to respond.

EFCA agrees with the Comments of Environmental Policy Law Center, Fresh Energy and Vote Solar that Xcel appears to be requiring interval meters for DG customers without statutory or regulatory authority to do so.<sup>11</sup> Xcel's apparent justification that such meters will "accommodate more complicated billing rates" makes little sense in light of all of the statutory prohibitions on discriminatory rates for DG. Other utilities do not require this capability for net metering customers, and Xcel should also not be allowed to do so.

Unlike the other utilities at issue in this Docket, Xcel has provided responses to some of EFCA's IRs. Some of Xcel's responses are incomplete or nonresponsive, but those that are responsive affirm EFCA's earlier analysis presented in Initial Comments that even if legal, Xcel's fees are not reasonable. Each of Xcel's responses to EFCA's IRs are discussed, below.

**a. Response to EFCA IR 1**

In Xcel's MPUC-003 Attachment A, the company applied a 13.88% carrying charge to the production meter, service meter programming, and installation of a service meter to arrive at an annualized incremental metering cost. That number, along with additional annual Customer Accounting and Assistance costs were divided by twelve to develop the monthly meter charge. As noted in our initial comments, EFCA does not agree with the application of a carrying charge on programming and installation costs. EFCA also does not agree with the methodology of applying the carrying charge to the

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<sup>11</sup> Environmental Policy Law Center, Fresh Energy and Vote Solar Comments at p. 14.

initial metering investment as a means of calculating a monthly fee. The carrying charge appears to include the company's depreciation cost and financing costs (i.e., "returns"). Since the meter depreciates, returns on the non-depreciated component should decline over time. EFCA sought additional information and clarification about the depreciation life of meters from Xcel in order to recreate a declining revenue requirement calculation for DG meters to determine whether the company's fees are reasonable given the depreciation of the meter over time. Xcel responded that their meters are depreciated over 15 years at an annual rate of 6.67 percent. Unfortunately as noted in the subsequent sections, there are still significant data gaps to confidently recreate a revenue requirement calculation.

**b. Response to EFCA IR 2**

In response to EFCA IR 2, Xcel states, "[t]he Company does not account for distributed generation (DG) customer account expenses, DG meter reading expenses, and DG customer account revenue requirements separately from other customers." This admission undermines Xcel's argument that the costs to serve DG customers are different from the costs to serve non- DG customers. If Xcel does not account for such costs for DG customer separately, it cannot know whether the costs to serve those customers is different. Without having even studied the issue, it is not reasonable to assess discriminatory rates on customers who choose to self-generate a portion of their electricity needs.

**c. Response to EFCA IR 3 and 4**

EFCA IR 3 and 4, ask the following similar questions:

EFCA IR 3 - Please explain the programming costs associated with meters required by DG customers. Please provide all data, calculations and

electronic worksheets used to determine the additional costs (for example, \$22.34 for A50 Rate Code – Single Phase) for programming a DG customer’s meter. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

EFCA IR 4 - Please provide all data, calculations, and electronic worksheets used to determine the installation cost (for example, \$36.31 for A50 Rate Code – Single Phase) of bidirectional service meters for DG customers, and why non-DG customers are not subject to these costs. Please explain how the Company tracks these costs and data for DG customers and, if the Company does not track these costs and data, please explain why not.

In response to both, Xcel merely states, “[w]e intend to provide supporting data for MPUC-003 Attachment A with our Reply Comments in this docket.” This answer is completely non-responsive and limits EFCA’s ability to recreate a revenue requirement calculation for DG meters. As stated above, it is not fair to allow utilities to present their case-in-chief through reply comments and deny other stakeholders an opportunity review, analyze and respond to their arguments.

**d. Response to EFCA IR 5**

As noted in our initial comments, EFCA is concerned with Xcel’s application of a 13.88% carrying charge to meter programming and installation costs. In response to EFCA IR 5, Xcel acknowledged an error in their MPUC-003 Attachment A that they will correct in Reply Comments, and said they do not apply a carrying charge to installation costs. EFCA believes more information is required to determine whether programming costs are subject to carrying cost charges. For example, are the programming costs solely for purchasing software, or does it include labor costs to program and calibrate the meter? In either case, to the extent Xcel provides its rationale in Reply Comments, EFCA believes stakeholders should have an opportunity to respond.

**e. Response to EFCA IR 6 & 7**

EFCA IRs 6 and 7 requested information on how the Company reads meters for DG customers and non-DG customers. The responses to both questions indicate that there is no physical difference between how a DG versus a non- DG meter is read. All such meters appear to be read over an automatic meter reading (AMR) radio frequency network owned by a third party. Xcel stated, “[n]o additional charges are incurred by a DG customer for reading their meters.” However in MPUC-003 Attachment A, Xcel assigns \$11.25 of incremental annual costs to DG customers for meter reading. This response further indicates that assessing different costs based on ongoing meter reading costs are not cost-based.

**f. Response to EFCA IR 8, 9 and 10**

EFCA IRs 8,9 and 10 requested information about how the Company maintains DG customer records for purposes of FERC accounting. Most importantly, whether the company maintains multiple customer records under FERC accounts for individual DG or cogeneration customers since Xcel’s response to MPUC-003 said DG customers typically have two meters and MPUC-003 Attachment A showed two Customer Accounting and Assistance charges. In response to each of these IRs, Xcel responded as follows:

No. The Federal Energy Regulatory Commission (FERC) account 903 [908, and 902 respectively] is a summary of Customer Records and Collection expenses. These costs are attributable to both DG and non-DG customers. In some cases, a specific cost would be attributable to all customers of record regardless of the complexity of the customer’s bill.

These responses further demonstrate that DG costs are not separately tracked further indicating that there is no cost basis for Xcel’s DG fees. In MPUC-003 the company says

the Customer Accounting and Customer Assistance expenses are divided by the number of customers. By charging DG customers twice and not reducing the charges for non-DG customers, the company could potentially over collect for Customer Accounting and Customer Assistance expenses.

## **10. Conclusion**

EFCA appreciates the Commission's inquiry into these fees and the opportunity to provide these comments. If other utilities choose to provide all of their rationale and support for their fees in Reply Comments in this Docket, EFCA requests that the Commission strike them as procedurally improper. It is not fair to allow utilities to present their case-in-chief through reply comments and deny other stakeholders an opportunity to respond.

Respectfully submitted this 6<sup>th</sup> day of June 2016.

BY: s/ Jacob J. Schlesinger  
Jacob J. Schlesinger, 41455  
KEYES, FOX & WIEDMAN, LLP  
1580 Lincoln St., Suite 880  
Denver, CO 80203  
(720) 639-2190  
[jschlesinger@kfwlaw.com](mailto:jschlesinger@kfwlaw.com)

**ATTORNEY FOR THE ENERGY  
FREEDOM COALITION OF  
AMERICA**

## CERTIFICATE OF SERVICE

I, Philip Jett, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail.

### REPLY COMMENTS OF THE ENERGY FREEDOM COALITION OF AMERICA

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

Dated this 6th day of June, 2016.

*/s/ Philip Jett*

Philip Jett  
Paralegal  
Keyes, Fox & Wiedman, LLP  
1580 Lincoln St., Suite 880  
Denver, CO 80203  
[pjett@kfwlaw.com](mailto:pjett@kfwlaw.com)

## Service List Member Information

## Electronic Service Member(s)

[Next / Last](#)

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Abbey	Ross	ross@mysunshare.com	SunShare, LLC	Electronic Service	No
Allen	Michael	michael.allen@allenergysolar.com	All Energy Solar	Electronic Service	No
Anderson	Julia	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	Yes
Anderson	Christopher	canderson@allete.com	Minnesota Power	Electronic Service	No
Baldwin Auck	Sara	sarab@irecusa.org	Interstate Renewable Energy Council, Inc.	Electronic Service	No
Bertsch	Derek	derek.bertsch@mrenergy.com	Missouri River Energy Services	Electronic Service	No
Blazar	William A.	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Electronic Service	No
Bradley	Kenneth	kbradley1965@gmail.com	N/A	Electronic Service	No
Brekke	Jon	jbrekke@greenergy.com	Great River Energy	Electronic Service	No
Brennan	Kathleen M.	kmb@mcgrannshea.com	McGrann Shea Carnival, Straughn & Lamb, Chartered	Electronic Service	No
Brusven	Christina	cbrusven@fredlaw.com	Fredrikson Byron	Electronic Service	No
Bull	Michael J.	mbull@mncee.org	Center for Energy and Environment	Electronic Service	No
Burdette	Jessica	jessica.burdette@state.mn.us	Department of Commerce	Electronic Service	No
Cannon	Joel	jcannon@tenksolar.com	Tenk Solar, Inc.	Electronic Service	No
Carnival	Douglas M.	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	Electronic Service	No
Carroll	John J.	jcarroll@newportpartners.com	Newport Partners, LLC	Electronic Service	No
Colburn	Kenneth A.	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	Electronic Service	No
Crocker	George	gwillc@nawo.org	North American Water Office	Electronic Service	No
Crowell	Arthur	Crowell.arthur@yahoo.com	A Work of Art Landscapes	Electronic Service	No
Currie	Leigh	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	Electronic Service	No
Dahlberg	David	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	Electronic Service	No
Darabi	James	james.darabi@solarfarm.com	Solar Farm, LLC	Electronic Service	No
Denison	Dustin	dustin@appliedenergyinnovations.org	Applied Energy Innovations	Electronic Service	No
Denniston	James	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	Electronic Service	No
Dieren	Curt	curt.dieren@dgr.com	L&O Power Cooperative	Electronic Service	No
Dobson	Ian	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	No
Eggl	Mike	megg@bepec.com	Basin Electric Power Cooperative	Electronic Service	No
Engelking	Betsy	betsy@geronimoenergy.com	Geronimo Energy	Electronic Service	No
Er	Oncu	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	Electronic Service	No
Farrell	John	jfarrell@ilsr.org	Institute for Local Self-Reliance	Electronic Service	No
Fazio	Emma	emma.fazio@stoel.com	Stoel Rives LLP	Electronic Service	No
Ferguson	Sharon	sharon.ferguson@state.mn.us	Department of Commerce	Electronic Service	No
Fox	Kevin T.	kfox@kfwlaw.com	KEYES, FOX & WIEDMAN, LLP	Electronic Service	No
Franzen	Nathan	nathan@geronimoenergy.com	Geronimo Energy	Electronic Service	No
Fredregill	Amy	Amy.S.Fredregill@xcelenergy.com	Xcel Energy	Electronic Service	No
Galvin	Hal	halgalvin@comcast.net	Provectus Energy Development llc	Electronic Service	No
Garry	Elaine	egarry@peoplesrec.com	Peoples Energy Cooperative	Electronic Service	No
Garvey	Edward	garveyed@aol.com	Residence	Electronic Service	No
Gleckner	Allen	gleckner@fresh-energy.org	Fresh Energy	Electronic Service	No
Gower	Bryan	bgower@apx.com	APX, Inc.	Electronic Service	No
Gulden	Timothy	info@winonarenewableenergy.com	Winona Renewable Energy, LLC	Electronic Service	No

Hainault	Tony	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	Electronic Service	No
Hebert	Duane	duane.hebert@novelenergy.biz	Novel Energy Solutions	Electronic Service	No
Helmerts	John	helmerts.john@co.olmsted.mn.us	Olmsted County Waste to Energy	Electronic Service	No
Hendricks	Jared	hendricksj@owatonnautilities.com	Owatonna Public Utilities	Electronic Service	No
Henkel	Annete	mui@mnuilityinvestors.org	Minnesota Utility Investors	Electronic Service	No
Hinkle	Lynn	lhinkle@mnmseia.org	Minnesota Solar Energy Industries Association	Electronic Service	No
Horan	Jim	Jim@MREA.org	Minnesota Rural Electric Association	Electronic Service	No
Hoyum	Lori	lhoyum@mnpower.com	Minnesota Power	Electronic Service	No
Hubbard	Jan	jan.hubbard@comcast.net	N/A	Electronic Service	No
Jacobson	Casey	cjacobson@bepc.com	Basin Electric Power Cooperative	Electronic Service	No
Jaffray	John S.	jjaffray@jjrpower.com	JJR Power	Electronic Service	No
Jones	Nate	njones@hcpd.com	Heartland Consumers Power	Electronic Service	No
Kampmeyer	Michael	mkampmeyer@a-e-group.com	AEG Group, LLC	Electronic Service	No
Kearney	John	jmkearney@MnSEIA.org	MnSEIA	Electronic Service	No
Keene	Kevin	kevin.keene@cummins.com	N/A	Electronic Service	No
Kegel	Jack	jkegel@mmua.org	MMUA	Electronic Service	No
Klein	Brad	bklein@elpc.org	Environmental Law & Policy Center	Electronic Service	No
Klein	Madeleine	mklein@socoreenergy.com	SoCore Energy	Electronic Service	No
Kluempke	John	jwklumpke@winlectric.com	Elk River Winlectric	Electronic Service	No
Kramer	Jon	jk2surf@aol.com	Sundial Solar	Electronic Service	No
Krause	Michael	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	Electronic Service	No
Landsman	Jeffrey L.	jlandsman@wheelerlaw.com	Wheeler, Van Sickle & Anderson, S.C.	Electronic Service	No
LeVander, Jr.	Harold	hlevander@felhaber.com	Felhaber, Larson, Fenton & Vogt, P.A.	Electronic Service	No
Leischow	Dean	dean@sunriseenergyventures.com	Sunrise Energy Ventures	Electronic Service	No
Lindell	John	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	Yes
Lipetsky	Phillip	greenenergyproductslc@gmail.com	Green Energy Products	Electronic Service	No
Lundberg	Rebecca	rebecca.lundberg@powerfullygreen.com	Powerfully Green	Electronic Service	No
McConnell	Erica	mcconnell@smwlaw.com	Shute, Mihaly & Weinberger LLP	Electronic Service	No
McGrane	Sara G	smcgrane@felhaber.com	Felhaber Larson	Electronic Service	No
McNary	Dave	David.McNary@hennepin.us	Hennepin County DES	Electronic Service	No
McWilliams	John	jmm@dairynet.com	Dairyland Power Cooperative	Electronic Service	No
Melone	Thomas	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	Electronic Service	No
Miller	Stacy	stacy.miller@state.mn.us	Department of Commerce	Electronic Service	No
Moe	David	momentums@aol.com	N/A	Electronic Service	No
Moe	Darrick	darrick@mrea.org	Minnesota Rural Electric Association	Electronic Service	No
Moeller	David	dmoeller@allete.com	Minnesota Power	Electronic Service	No
Monsebroten	Dalene	dalene@mncable.net	Northern Municipal Power Agency	Electronic Service	No
Moratzka	Andrew	andrew.moratzka@stoel.com	Stoel Rives LLP	Electronic Service	No
Morud	Martin	mmorud@trunorthsolar.com	Tru North Solar	Electronic Service	No
Niles	David W.	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Electronic Service	No
Nissen	Will	nissen@fresh-energy.org	Fresh Energy	Electronic Service	No
Noble	Michael	noble@fresh-energy.org	Fresh Energy	Electronic Service	No
Nordstrom	Rolf	rnordstrom@gpsid.net	Great Plains Institute	Electronic Service	No
Norris	Samantha	samanthanorris@alliantenergy.com	Interstate Power and Light Company	Electronic Service	No
O'Neill	Jeff	jeff.oneill@ci.monticello.mn.us	City of Monticello	Electronic Service	No
Olson	Russell	rolson@hcpd.com	Heartland Consumers Power District	Electronic Service	No
Patry	Dan	dpatry@sunedison.com	SunEdison	Electronic Service	No
Paulson	Jeffrey C	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	Electronic Service	No
Pendray	John	john.pendray@cummins.com	N/A	Electronic Service	No
Peranteau	Mary Beth	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	Electronic Service	No



Pickard	Donna	dpickardgsss@gmail.com	Citizen	Electronic Service	No
Prazak	David G.	dprazak@otpc.com	Otter Tail Power Company	Electronic Service	No
Prest	Gayle	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	Electronic Service	No
Rathbun	Mark	mrathbun@greenergy.com	Great River Energy	Electronic Service	No
Reinertson	Michael	michael.reinertson@avantenergy.com	Avant Energy	Electronic Service	No
Reuther	Kevin	kreuther@mncenter.org	MN Center for Environmental Advocacy	Electronic Service	No
Rustad	Craig	crustad@minnkota.com	Minnkota Power	Electronic Service	No
Sahr	Robert K.	bsahr@eastriver.coop	East River Electric Power Cooperative	Electronic Service	No
Savelkoul	Richard	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	Electronic Service	No

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#### Paper Service Member(s)

Last Name	First Name	Company Name	Address	Delivery Method	View Trade Secret
Eide Tollefson	Kristen	R-CURE	28477 N Lake Ave, Frontenac, MN-55026-1044	Paper Service	No
Houston	Ashley	N/A	120 Fairway Rd, Chestnut Hill, MA-24671850	Paper Service	No
Ketchum	Julie	Waste Management	20520 Keokuk Ave, Lakeville, MN-55044	Paper Service	No
Levchak	Deborah Fohr	Basin Electric Power Cooperative	1717 East Interstate Avenue, Bismarck, ND-585030564	Paper Service	No
Miller	Alan	N/A	2210 20th St NE, Stewartville, MN-55976	Paper Service	No
Nelson	Ben	CMMPA	459 South Grove Street, Blue Earth, MN-56013	Paper Service	No
Reinhardt	John C.	Laura A. Reinhardt	3552 26Th Avenue South, Minneapolis, MN-55406	Paper Service	No
Sedgwick	Dean	Itasca Power Company	PO Box 457, Bigfork, MN-56628-0457	Paper Service	No

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