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July 21, 2017

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

**RE: In the Matter of Commission Inquiry into Grid Modernization  
Docket No. E999/CI-15-556  
Section C Comments**

Dear Mr. Wolf,

Otter Tail Power Company (Otter Tail or Company) respectfully submits its Comments in response to the Commissions April 26, 2017 notice in the above referenced docket. Otter Tail appreciates the opportunity to provide these comments.

If you have any questions regarding this filing, please contact me at 218-739-8565 or at [mriewer@otpc.com](mailto:mriewer@otpc.com).

Sincerely,

*/s/ MICHAEL RIEWER*  
Michael Riewer  
Manager, Special Projects

ljh  
Enclosures  
By electronic filing  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of Commission Inquiry into  
Grid Modernization

Docket No. E999/CI-15-556

**OTTER TAIL POWER COMPANY  
SECTION C COMMENTS**

**Section C**

**Are there ways to improve or augment Minnesota utilities' distribution system  
planning processes?**

To summarize responses under Parts A and B of this request, Otter Tail does not have an annual process that studies the distribution system with electrical models like what is done on the transmission network through MISO's MTEP process. However, Otter Tail does diligently monitor system performance of its distribution system and runs studies as necessary. Otter Tail budgets for system needs annually, which represents a forecasted five-year outlook of capital spend and annual operation and maintenance spend. Otter Tail also experiences low load growth and low DER applications and penetration which reduces the number of distribution studies needed based on those two drivers. Otter Tail believes the current process has worked well and does not warrant change at this time.

**1) Evaluation of utility plans. Discuss:**

- a. How utility distribution plans should be used in other proceedings: Should distribution plans be approved by the Commission? If so, what are the implications for cost recovery, i.e., to what extent would Commission approval of a plan constitute a finding of prudence?**

Otter Tail does not currently believe there is a sufficient need or driver that requires the Commission to approve distribution plans. The current process employed by Otter Tail to evaluate and plan for reliably serving its customers has served Otter Tail and its customers well given that projects can be efficiently planned, designed, and constructed in the necessary timelines driven by customer demand. Oftentimes, needs on the distribution system arise quickly (e.g., new load) and introducing the complexity and added element of time and process to the simple, yet effective, approach currently employed by Otter Tail is concerning and could, quite conceivably, negatively impact reliability due to delay in swiftly addressing

unplanned load-serving needs caused by the introduction of a formal submittal/approval process by the Commission. If there was a requirement for Commission approval, Otter Tail prefers that any such requirements should be based on certain criteria, such that not all distribution projects or plans would need to go through a formal approval process.

**b. How specifically should an approved distribution system plan be integrated with other planning activities: resource planning, interconnection, transmission, or others?**

As the Company stated in responses in questionnaire A and B, core assumptions should be consistent throughout various planning activities, and are, within Otter Tail. To the extent necessary, Otter Tail integrates its distribution planning with other planning activities such as resource planning, interconnection, and transmission planning. That said, distribution planning is very localized whereas transmission and resource planning is done on a more system wide or regional level. Therefore, although consistency of assumptions throughout different planning activities is critical, the outcome of distribution planning is not generally to a magnitude to have a meaningful impact to other planning activities, such as resource planning or transmission planning.

**c. What are reasonable options for stakeholder participation in the planning process: direct engagement in the development of plans, the review of draft and final plans, other?**

As previously described, the Otter Tail distribution system is very localized in nature with limited interest by stakeholders to participate in the planning and/or review of Otter Tail's distribution system. To date, interest from external stakeholders to engage in the distribution planning process has only been exhibited by those external stakeholders who have a direct interest in the outcome of the distribution planning process (e.g. interconnection customer of a new DER request). These external stakeholders are generally focused on the specific, localized area, in which they have an interest/project, rather than an interest in the broader transmission planning or resource planning process. Otter Tail's process of working with external stakeholders provides awareness and information of any potential limitations and/or constraints on the localized distribution system and has historically proven effective.

**d. Criteria or metrics the Commission should use in evaluating proposed distribution plans**

As previously provided, the need/driver for Commission evaluation of the local distribution plan is not a necessary requirement at this time. However, if the

Commission were to evaluate proposed distribution plans, the Commission should evaluate such proposed plans on the metrics like other investments evaluated by the Commission (i.e., reliability, cost effectiveness, customer impacts, etc.).

**e. How often should a utility distribution plan be submitted for Commission review?**

All distribution plans are not alike and therefore, if utility distribution plans are required to be reviewed at all, they should be reviewed based on specific metrics or criteria rather than merely scheduled timeframes. As previously noted, distribution planning is often driven by immediate needs rather than a long-term plan such as transmission planning and therefore, distribution planning does not lend itself as readily to an annual review process like that of transmission planning. In addition, because of the dynamic nature of the distribution system, the immediacy of many projects is not well suited for a formal review/approval. A formal process has the potential to detrimentally delay the in-service/need-by date for the customer. On average, Otter Tail distribution engineers generate upwards of 1,500 work orders annually. Each work order is making either an addition to the distribution system or modifications to the system.

**2) Feasibility of planning enhancements. Discuss:**

**a. Whether all investor-owned utilities should adopt uniform planning processes**

In general, all utilities study distribution systems in a similar manner. Forecasts are created, studies are completed and compared against industry standard performance measures, and alternatives are compared when performance is not satisfactory and mitigation is needed (i.e. system additions or enhancements). However, differences occur in the details of planning such as; what information is available (AMI, SCADA, etc.), load density and growth, frequency of study, and other factors.

If a uniform process was created and mandated to be followed, it would need to be flexible enough for all utilities to utilize their unique customer needs and system constraints. For this reason, and the complexity it presents, Otter Tail recommends the Commission not mandate a uniform process.

**b. Taking resource concerns into account, what are the events or system conditions that should trigger the adoption of enhanced planning processes by an individual utility? (e.g., high distributed generation interconnection requests, high DER penetration, high capital/operating budget needs, other)**

An enhanced planning process should only be considered for significant changes to the distribution system. Depending on the localized distribution system and each

individual utility, there are many different criteria or triggers that could be considered and may be best suited for a working session to finalize. Some criteria for consideration of an enhanced planning process for an individual utility could include the following:

- Customers impacted by a distribution project.
- DER penetration and applications within a local distribution system
- Cost of a distribution project
- MW size of a DER project
- And likely many more to consider

Lastly, the Company believes distribution planning impacts will be localized and stakeholders will be most interested in the local impacts as well.

**3) Forecasting. Discuss whether demand forecasting and DER modeling may be improved by:**

**a. Integrating system-wide forecasts, circuit-level forecasts, and forecasts of geographic dispersion of DER to map potential impacts, both beneficial and detrimental, of increased DER, or other**

The need for DER forecasting in distribution planning should be triggered on DER applicants. Right now, Otter Tail sees minimal value to its customers with the minimal DER applications to date. DER Demand forecasting and DER modeling could offer more accurate study results, but the results from this information is negligible with current applications pending on the Otter Tail distribution systems.

For background as stated in Section A and B responses, Otter Tail has 56 DERs installed on the system over the past ten years, for 7.9 MW, which represents less than 1% of our total load. In 2016, Otter Tail had six DER applications submitted, which totaled 96 kW.

**b. Using probabilistic analysis for availability of DER in high-DER-penetration scenarios, i.e. considering the likelihood of coincident failure or unavailability of multiple DER assets**

See response to 3a.

**4) Scenarios. Discuss:**

Otter Tail has provided initial responses on some of the questions remaining. Some have been left blank for future stakeholder discussions.

**a. What type of input should stakeholders have into the selection of planning scenarios?**

Since distribution planning is localized to specific areas, scenarios should be limited to reasonable outcomes that are heavily based on past trends exhibited in localized areas (e.g. load growth patterns, load characteristics and demand, DER installations, etc.). Planning scenarios should be limited to past operating conditions that have historically been known to cause reliability challenges on local distribution systems (e.g. peak load conditions, light load conditions, etc.) Otter Tail has historically observed reliability challenges during peak load scenarios as well as isolated low load scenarios. Again, reliability, power quality, safety, cost effectiveness to all customers, and customer satisfaction should be the at the heart of distribution planning.

**b. What criteria should be used by utilities to identify relevant planning scenarios?**

As mentioned above, criteria for identifying relevant planning scenarios should be heavily based on past trends and concerns exhibited in local areas. For example, Otter Tail serves customers in smaller communities of Minnesota that will have different trends and characteristics as compared to customers in heavily populated areas that may have a more aggressive historical trend of DER installations and demand growth.

**c. Should all utilities use common planning scenarios, or should they be tailored to the circumstances of individual utilities?**

As stated in response 4a, distribution planning scenarios will be specific to local areas and trends. Therefore, scenarios will need to be tailored to local areas vs utility or state-wide specific. Otter Tail recommends not utilizing the same scenarios across the state.

**d. Should planning scenarios be common across multiple planning cycles, or should planning scenarios be redefined with each new planning cycle?**

No comment at this time.

**e. What are reasonable timeframes for each use and consideration of a scenario, and how often should they be reevaluated?**

No comment at this time.

**5) Standards. Discuss:**

**a. Standards and codes that will be applicable to the enhanced integration of DER into distribution system planning and operations**

There are a range of standards and codes that would apply to different DERs depending on what context is being discussed (i.e. reliability, communications). That said, Otter Tail processes all applications received today and they are integrated into system planning and operations. DERs should follow the same reliability and safety standards which are used throughout distribution planning as described in prior responses.

**6) Access to grid and planning data by customers and third parties. Discuss:**

Access to data will need to be considered very carefully as the data could potentially be misused. Consideration will need to be given to Critical Energy Infrastructure Information (CEII) as well as specific information as it relates to individual customers. Customer data privacy has been discussed under docket no. 12-1344 and the decisions and outcomes of that docket will need be considered within these discussions as well.

Questions surrounding data access should be deferred to a working group as there are many perspectives and considerations.

**7) Hosting Capacity. Discuss:**

Like sharing of data, publishing hosting capacity information needs to be carefully considered in terms of privacy and security as well. Delivering hosting capacity information can be taken to mean many different deliverables. A discussion about what hosting capacity information is needed, what it represents and doesn't represent, would be warranted to set clear expectations amongst stakeholders.

Additionally, many forms of hosting capacity would take substantial resources to create. As discussed in section 3a, Otter Tail has observed minimal requests for interconnection and thus feels hosting capacity information would take more resources to create than it's worth to its customers at the current time. Similar to other responses, perhaps there are thresholds as it relates to the number of interconnection requests or DER installations before development of hosting capacity information would be warranted.

**8) Strawman distribution planning outlines and/or processes are welcome.**

Otter Tail presented its distribution planning process in the fall of 2015 at the Commissions working sessions related to this docket. The material from that working session is still pertinent today.

**9) Are there other issues or topics not covered here that are relevant to discuss in distribution system planning? If so, what are they and why are relevant?**

Distribution planning should remain consistent with producing and delivering

reliable, economical, and environmentally responsible electricity to our customers. Distribution planning is more dynamic than other planning processes as requests/needs can arise quickly. Utilities will need to remain responsive to these requests/needs or risk lack of service or service quality to customers. Lastly, distribution planning is more localized than other planning processes such as resource planning and transmission planning and would warrant different stakeholder and reviewed processes because of such.

Because of the localized impacts, potentially vast variances across the state related to distribution planning, dynamic nature of distribution requests, and performance of the existing planning process for Otter Tail, a common planning process for the entire state is not recommended at this time. If uniform processes or procurements are required, they should be flexible for all utilities to tailor to their unique needs and be developed such that they provide value to all customers. Otter Tail believes there are many questions within parts A, B, and C which are best suited for a working group to discuss. Otter Tail looks forward to working with the Commission and potential working group(s) in the future on these items.

Dated: July 21, 2017

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ MICHAEL RIEWER

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## CERTIFICATE OF SERVICE

**RE: In the Matter of Commission Inquiry into Grid Modernization  
Docket No. E999/CI-15-556**

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

**Otter Tail Power Company  
Section C Comments**

Dated this **21st** day of **July, 2017**

/s/ LINDSAY HAUER

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane  Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58501	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
John S.	Jaffray	jjaffray@jrpwr.com	JJR Power	350 Highway 7 Suite 236  Excelsior, MN 55331	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248  Madison, SD 57042	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road  Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Kearney	jmkearney@MnSEIA.org	MnSEIA	2512 33rd Ave S  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Jennifer	Kefer	jennifer@dgardiner.com	Alliance for Industrial Efficiency	David Gardiner & Associates, LLC 2609 11th St N Arlington, VA 22201-2825	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave Ste 200  Lakeville, MN 55044	Paper Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600  Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Madeleine	Klein	mklein@socoreenergy.com	SoCore Energy	225 W Hubbard Street Suite 200 Chicago, IL 60654	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
John	Kluempke	BADEMAIL- jwkluempke@winlectric.com	Elk River Winlectric	12777 Meadowvale Rd  Elk River, MN 55330	Paper Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Brian	Krambeer	bkrambeer@tec.coop	Tri-County Electric Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Jon	Kramer	sundialjon@gmail.com	Sundial Solar	3209 W 76th St  Edina, MN 55435	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Matthew	Lacey	Mlacey@grenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Dean	Leischow	dean@sunriseenergyventures.com	Sunrise Energy Ventures	601 Carlson Parkway, Suite 1050  Minneapolis, MN 55305	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Benjamin	Lowe	ben.lowe@alevo.com	Alevo USA Inc.	2321 Concord Parkway South  Concord, North Carolina 28027	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7 h St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Erica	McConnell	mcconnell@smwlaw.com	Shute, Mihaly & Weinberger LLP	396 Hayes St  San Francisco, California 94102-4421	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
John	McWilliams	jmm@dairy.net	Dairyland Power Cooperative	3200 East Ave SPO Box 817  La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Herbert	Minke	hminke@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Dalene	Monsebroten	dalene@mncable.net	Northern Municipal Power Agency	123 2nd St W  Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Martin	Morud	mamorud@trunorthsolar.com	Tru North Solar	5115 45th Ave S Minneapolis, MN 55417	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Michael	Murray	mmurray@missiondata.org	Mission:Data Coalition	1020 16th St Ste 20 Sacramento, CA 95814	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Ron	Nelson	ron.nelson@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Samantha	Norris	samanhanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400 Burlington, MA 01803	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248  Madison, SD 570420248	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive  Belmont, CA 94002	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor  Madison, WI 53703	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute	1000 Vermont Ave, Third Floor  Washington, DC 20005	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
David G.	Prazak	dprazak@otlpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315  Minneapolis, MN 55415	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gregory	Randa	granda@lakecountrypower.com	Lake Country Power	2810 Elida Drive  Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Mark	Rathbun	mra hbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Michael	Reinertson	michael.reinertson@avanteenergy.com	Avant Energy	220 S. Sixth St. Ste 1300  Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
John C.	Reinhardt		Laura A. Reinhardt	3552 26Th Avenue Sou h  Minneapolis, MN 55406	Paper Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Craig	Rustad	crustad@minnkota.com	Minnkota Power	1822 Mill Road PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227  Madison, SD 57042	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Thomas	Scharff	homas.scharff@versoco.com	Verso Corp	600 High Street  Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390  St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW  Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Dean	Sedgwick	N/A	Itasca Power Company	PO Box 457  Bigfork, MN 56628-0457	Paper Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology	120 Tredegar Street  Richmond, Virginia 23219	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
William	Seuffert	Will.Seuffert@state.mn.us		75 Rev Martin Luther King Jr Blvd 130 State Capitol St. Paul, MN 55155	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
David	Shaffer	DShaffer@MnSEIA.org	Minnesota Solar Energy Industries Project	1005 Fairmount Ave  Saint Paul, MN 55105	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Patricia	Sharkey	psharkey@environmentalawcounsel.com	Midwest Cogeneration Association.	180 N. LaSalle Street Suite 3700 Chicago, Illinois 60601	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Ave S  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave  Campbell, CA 95008	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy	1350 Landmark Towers 345 St. Peter St St. Paul, MN 55102	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2  San Francisco, California 94105	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201  St. Paul, MN 55104	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street  San Francisco, CA 94102	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Tom	Stanton	tstanton@nrri.org	NRRI	1080 Carmack Road  Columbus, OH 43210	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List
Byron E.	Starns	byron.starns@stinson.com	Stinson Leonard Street LLP	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15- 556_OFF_SL_15- 556_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828  Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Steve	Thompson	stevet@cmpasgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St  Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Karen	Tumboom	karen.tumboom@versocom.com	Verso Corporation	100 Central Avenue  Duluth, MN 55807	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South Walnut PO Box 800  Owatonna, MN 55060	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind	618 2nd Ave SE  Minneapolis, MN 55414	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Jason	Willett	jason.willett@metc.state.mn.us	Metropolitan Council	390 Robert St N  Saint Paul, MN 55101-1805	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7 h Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Thomas J.	Zaremba	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor  Madison, WI 53703	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List
Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwy Court  Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_15-556_OFF_SL_15-556_Official Service List