



414 Nicollet Mall
Minneapolis, MN 55401

February 20, 2014

—Via Electronic Filing—

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
VALUE OF SOLAR METHODOLOGY
DOCKET NO. E999/M-14-65

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits the attached Reply Comments in response to parties' comments submitted February 13, 2014 on the Value of Solar (VOS) methodology proposed by the Department of Commerce, Division of Energy Resources on January 31, 2014.

We have electronically filed this document with the Minnesota Public Utilities Commission and copies have been served on the parties on the attached service list.

Please contact Amy Liberkowski at amy.a.liberkowski@xcelenergy.com or (612) 330-6613 if you have any questions regarding this filing.

Sincerely,

/s/

CHRISTOPHER B. CLARK
REGIONAL VICE PRESIDENT
RATES AND REGULATORY AFFAIRS

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF ESTABLISHING A
DISTRIBUTED SOLAR VALUE
METHODOLOGY UNDER MINN. STAT.
216B.164, SUBD. 10 (E) AND (F)

DOCKET NO. E999/M-14-65

REPLY COMMENTS

OVERVIEW

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to Comments filed by other parties on the proposed Value of Solar (VOS) methodology. We appreciate the opportunity to provide additional input and focus our Reply on key issues not addressed in our initial Comments.

It is important for the VOS methodology to be as accurate as possible. We believe the methodology will be most accurate when it reflects vetted and tested resource planning practices and an objective analysis of what costs distributed solar will truly avoid. Being accurate at the outset will mitigate the risk of future issues and better ensure that the transition to a more distributed energy system is thoughtful, deliberate, and beneficial to all customers.

The VOS framework has the potential to successfully expand solar in Minnesota. Unlocking that success will largely depend on how accurately the methodology reflects the real value of distributed solar and how well we utilize incentives to drive market adoption. Incentives complement the VOS tariff by providing a flexible mechanism to offset the incremental costs of smaller scale solar installations, while allowing the VOS to serve its intended purpose of reflecting the value of solar energy on the system. In other words, the VOS rate is a payment for the value of the energy delivered to the system; the incentive is an additional payment to lower a customer's cost of installing solar and drive customer adoption. We believe this complementary package will result in a robust, vibrant solar industry.

To help put the compensation package in context, we note that Department Staff has recommended approval of a Solar*Rewards incentive of \$0.08/kWh. The Made in Minnesota program offers incentives ranging from \$0.13 - \$0.39/ kWh. These incentives are in addition to compensation received through the VOS and can be adjusted based on market response. Should additional compensation be required to achieve the desired level of customer adoption, we are willing to work with parties on incentive options that are separate from the base VOS components.

We believe our suggested modifications to the methodology and our willingness to achieve policy objectives through a constructive approach to incentives will align the various interests in this docket, position Minnesota for success, and potentially serve as a best practice nationwide. We provide a summary of our recommended modifications as Attachment A.

Additionally, while we should do our best at the outset to get the methodology as accurate as possible, we recognize that VOS is a new concept for Minnesota and the solar industry is in early stages of growth. We believe there should be opportunities beyond just an annual update of cost inputs to periodically assess the effectiveness of the VOS tariff at achieving its objectives and to evaluate the need for adjustments based on new information, evolving environmental regulations, and other developments affecting VOS. This is similar to the report and evaluation approach taken with CIP performance incentives. The intent would not be to revisit the basic foundation of the methodology, but to determine whether there are additional benefits and costs that should be quantified and refinements that are needed to best reflect the demonstrated value of solar. It could also provide a clearer path for addressing the placeholder values. For example, the evaluation might reveal new information on integration costs and produce a method to quantify those costs for inclusion in the methodology.

We recommend revisiting the methodology once we, as a state, have two years of experience implementing a VOS tariff through one or more utilities. Because statute requires the VOS rate to be at least the retail rate for the first three years, we believe it makes sense to revisit the VOS methodology before that rate floor expires.

REPLY COMMENTS

In these Reply Comments we respond to the key issues raised by parties.

A. Additional Value Components

In this section we respond to the joint comments filed by the Environmental Law and Policy Center¹ (ELPC) and the individual comments filed by The Alliance for Solar Choice (TASC) and the Minnesota Solar Energy Industries Association (MnSEIA) with regard to their recommendation to include additional value components in the methodology. We believe the Department correctly applied the clarification or condition provided in subd. 10 (f) that optional components may only be included if they are “based on known and measurable evidence of the cost or benefit of solar operation to the utility.”² We recommend the Commission accept, with the exception of the fuel hedge value (or fuel price guarantee) and avoided reserve capacity cost, the Department’s selection of components, noting that we disagree with how the methodology treats many of these components. Please see our initial Comments for a detailed discussion of the VOS components.

1. *Avoided Solar Energy Standard (SES) Compliance Value*

The parties listed above recommend that the Commission modify the proposed methodology to include a value for avoided SES compliance costs, which they state is a distinct part of a solar renewable energy credit (SREC). While parties recognize that statute is clear about transferring all SRECs to the utility providing the VOS credit, they believe the methodology does not provide compensation for the full value of the SREC, particularly avoided compliance costs.

We disagree that there is a separate compliance value associated with a REC. Broadly speaking, a REC is a policy instrument that represents the qualities or attributes that distinguish renewable energy from conventional energy sources. It represents the “renewableness” of the energy and can be transferred separately from the physical energy. It is these same renewable energy attributes that give RECs value as a compliance tool; without these attributes the energy would not be considered renewable and would not be eligible for compliance. Simply put, there is no distinct compliance value above and beyond the attributes that comprise a REC; they are one in the same. Additionally, we have not observed a separate compliance value component within RECs in other markets.

This is supported by statute, which states RECs “represent energy produced by an eligible energy technology.”³ Through either net metering, the average retail rate, or

¹ Filed on behalf of Fresh Energy, Interstate Renewable Energy Council, Institute for Local Self-Reliance, Izaak Walton League of America, SunEdison, and the Vote Solar Initiative.

² Minn. Stat. 216B.164, Subd. 10(f)

³ Minn. Stat. § 216B.1691, subd. 4

the VOS tariff, the utility is purchasing the energy at a legislatively or administratively determined rate that reflects its value as an eligible energy (*i.e.*, renewable energy) technology. Providing a separate REC payment under any of these schemes would result in double-paying for the solar energy and increase the cost of compliance for customers.

We also disagree with the statement that SRECs acquired under the VOS tariff will reduce a utility's cost of compliance with the SES by reducing the number of SRECs a utility would otherwise need to purchase. The amount of solar energy needed to meet the 1.5 percent standard can be considered a fixed number. What is not fixed is how we acquire energy to satisfy the standard.⁴ Thus, purchases of energy under the VOS tariff do not reduce our overall compliance amount, they simply purchase it from one source over another, namely smaller distributed solar over large-scale systems. Thus, any compliance value included in the VOS methodology should compare large-scale solar and smaller distributed solar as means of meeting the statutory requirement.

2. *Capacity Adder*

The ELPC recommends a capacity adder to compensate systems with tracking mechanisms or non-standard orientations for the additional capacity benefit. It is unclear whether the capacity adder would affect all the capacity-related components, or just generation capacity. Nonetheless, we believe this issue could be addressed as part of a later evaluation, but should not be included now. Having multiple rates based on different orientations and system features will increase the complexity of the methodology and its implementation. Throughout the stakeholder process, we, along with other parties, stated that the methodology should be simple but not simplistic, recognizing some generalizations must be made to manage the complexity of the formula and ease of implementation. The proposed methodology's fleet approach, which incorporates a range of solar facility orientations and locations, is an appropriate way to balance accuracy and simplicity.

Additionally, because compliance with the SES is measured in energy (kWh), we believe it makes sense for the VOS to optimize energy production.

⁴ We acknowledge that there is a 10 percent carve-out for systems with capacity < 20 kW. Because we expect to meet that requirement through available incentive programs, under which we expect to receive the RECs, purchases of energy under a VOS tariff will likely not impact our ability to meet the 10 percent requirement.

3. *Market Price Reduction*

The ELPC recommends the addition of a placeholder for market price reduction. Market price reduction or response refers to an alleged decrease in wholesale electricity prices due to a reduction in demand from solar. While we are open to revisiting additional components during a later evaluation, we believe the premise behind the market price reduction component is flawed and should not be assigned a placeholder.

This is another area where it is unclear that distributed solar would create a measurable and unique benefit compared to other resource options. The value of energy produced by solar installations is already captured in the avoided capacity, fuel cost, and O&M components of the VOS. Including an estimate of market price reductions would result in double-counting the benefits. Additionally, we plan our system to have sufficient generation to meet our customers' load and rely on our fleet to supply the necessary energy. It is possible that other utilities might benefit from overall lower market prices, but benefits to other companies should not be paid by our customers through the VOS. It is also possible that solar could cause price variations in the real-time market as the sun goes behind clouds or as it gets dark.

4. *Economic Development*

MnSEIA recommends the inclusion of an economic development value that expresses the “increased tax revenues, reduced unemployment, and increase in general confidence conducive to business development” that would be provided by the VOS tariff. We are not aware of a consistent or agreed upon method for quantifying the economic development directly related to solar and calculating its value to the utility. Therefore, we believe that the economic development value does not meet the “known and measurable” standard established in statute.

In recommending inclusion of an economic development value, MnSEIA references our economic development rates as evidence of the benefit economic development provides to the utility. What our economic development rates are designed to do is add and retain load, which allows fixed costs to be spread over a larger sales base and lowers the cost of service for all customers. Distributed solar does not increase consumption and, therefore, does not create the same kind of direct benefit intended by our economic development rates. Further, while solar development may increase tax revenues, we are not aware of any evidence that proves that increases in tax revenue result in or are directly correlated with higher energy sales to a particular utility.

Further, it is unclear that there is a net economic benefit attributable to distributed generation since the alternative for meeting the Solar Energy Standard is utility-scale solar, which would also create jobs and support economic development at a potentially lower cost.

Again, should additional compensation be required as part of the overall package, we believe it should be in the form of incentives, not through increases to required VOS components or addition of optional components that do not satisfy the “known and measurable” standard.

B. VOS Tariff as a Replacement of Net Metering

TASC states that the VOS tariff is not a replacement of net metering and customers should be able to retain a net metering option. We believe that statute and legislative intent support the VOS tariff as a replacement of net metering, such that when a utility is operating under an approved VOS tariff, the utility will no longer provide net metering as an option for new solar installations. TASC argues that only the “rate” is replaced by the VOS tariff, allowing the net metering framework to coexist with a VOS rate. We believe TASC’s reliance on its interpretation of “rate” is misguided. In Minnesota, “... the term ‘rate’ is defined by statute to include all tariffs, rules, practices and contracts affecting the rate charged.”⁵ (Minn. Stat. § 216B.02, subd. 5.) Accordingly, as applied to the Company, the statute is clear that once the VOS tariff is adopted, then this is “in lieu of”⁶ the A50 net metering service found at Section 9, Sheet 2, of the Company’s tariff. TASC is also incorrect in asserting that a VOS rate should be inserted into this net metering tariff.

Additionally, there is no conflict with the Public Utility Regulatory Policies Act of 1978, as a VOS tariff will not replace our A51 and A52 tariffs found at Section 9, Sheets 3 and 4. These tariffs allow qualifying facility (QF) customers to serve onsite load with a qualifying facility and allow the QF, consistent with PURPA, to determine the energy to be available for such purchase.

CONCLUSION

We appreciate the opportunity to respond to comments on the proposed methodology. As noted in our initial Comments, we believe the VOS framework has the potential to expand distributed solar in Minnesota in a way that is fair and

⁵ *Computer Tool & Engineering, Inc v. Northern States Power Company*, 453 N.W.2d 569, 572-573 (Minn. Ct. App. 1990), review denied (Minn. 1990).

⁶ Minn. Stat. 216B.164, Subd. 10(b).

beneficial to all customers. It is important to get the rate as accurate as possible from the outset to establish a sound foundation for growth and reduce the risk of potential future issues. We respectfully request the Commission recommend our modifications to the Department. Should additional time be necessary to reach consensus on a modified methodology, we agree to work with the Department and other parties to submit a revised methodology within a designated timeframe.

Dated: February 20, 2014

Northern States Power Company

Summary of Recommended Modifications

Our recommended modifications seek to accomplish one or more of the following objectives:

- Remain consistent with resource planning practices, precedent, and assumptions;
- Use actual cost data where available and appropriate; and
- Use a fact-based approach to determine which costs can truly be avoided by solar.

Issue Category	DOC Proposed Methodology	Recommended Alternative
Avoided Generation Capacity Cost	Base avoided cost on the installed capital cost of a peaking combustion turbine and a combined cycle gas turbine, interpolated based on heat rate.	Use information from resource planning on timing and type of actual planned new capacity investments and calculate avoided generation capacity cost using MISO capacity accreditation practices.
Avoided Environmental Cost	Use Commission-approved externality values, substituting the CO ₂ externality value with the federal social cost of carbon.	Use midpoint of carbon proxy value range approved for use in resource planning. Exclude externality values.
Avoided Transmission Capacity Cost	Base on MISO's network integration service rate.	Base on actual investment plans and what can be avoided by distributed solar (<i>i.e.</i> , transmission upgrade costs associated with planned natural gas units).
Avoided Fuel Cost- Fuel Price Escalation	Base on growth rate over the NYMEX strip period.	Use fuel price forecast used in resource planning.
Avoided Fuel Cost- Fuel Hedge Value	Select one of three options to calculate fuel hedge value.	Exclude or modify to reflect actual financial fuel hedge costs incurred by utility (for Company this is \$0). Alternately, use renewable energy contract instead of natural gas contract.
Avoided Distribution Capacity Cost	Select either system-wide avoided costs or location-specific avoided costs	Approve both options but modify system-wide approach to base avoided costs on actual costs per installed capacity and limit to costs related to capacity additions.
Avoided Reserve Capacity Cost	Multiply avoided generation capacity cost by the reserve capacity margin (%).	Exclude to reflect inability of distributed solar to reduce margin requirements.
Loss analysis	Calculate on marginal basis.	Calculate on average basis.
Load match analysis - Distribution	Peak load reduction (PLR) based on coincident system peak	Use average PLR based on each utility's unique customer mix.

CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies of the foregoing document or a summary thereof on the attached lists of persons:

xx by depositing a true and correct copy or summary thereof, properly enveloped with postage paid, in the United States Mail at Minneapolis, Minnesota; or

xx via electronic filing

DOCKET No. E999/M-14-65

Dated this 20th day of February 2014

/s/

SaGonna Thompson
Records Analyst

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_14-65_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_14-65_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_14-65_Interested Parties
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	SPL_SL_14-65_Interested Parties
John	Aune	johna@bluehorizonsolar.com	Blue Horizon Energy	7246 Washington Ave S Eden Prairie, MN 55344	Paper Service	No	SPL_SL_14-65_Interested Parties
Kenneth	Baker	N/A	Wal-Mart Stores, Inc.	2001 SE 10th St. Bentonville, AZ 72716-5530	Paper Service	No	SPL_SL_14-65_Interested Parties
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
James J.	Bertrand	james.bertrand@leonard.com	Leonard Street & Deinard	150 South Fifth Street, Suite 2300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	SPL_SL_14-65_Interested Parties
Thor	Bjork	Thor.S.Bjork@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	Suite 4800 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	SPL_SL_14-65_Interested Parties
Kenneth	Bradley	ken@mncommunitysolar.com	Minnesota Community Solar	4000 Minnehaha Ave Minneapolis, MN 55406	Electronic Service	No	SPL_SL_14-65_Interested Parties
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_14-65_Interested Parties
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	SPL_SL_14-65_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_14-65_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_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joel	Cannon	jcannon@tenksolar.com	Tenk Solar, Inc.	9549 Penn Avenue S Bloomington, MN 55431	Electronic Service	No	SPL_SL_14-65_Interested Parties
Tammie	Carino	tcarino@GREnergy.com	Great River Energy	12300 Elm Creek Blvd. Maple Grove, MN 55369-4718	Electronic Service	No	SPL_SL_14-65_Interested Parties
Douglas M.	Carnival		McGrann Shea Anderson Carnival	Straugn & Lamb 800 Nicollet Mall, Suite 2600 Minneapolis, MN 554027035	Paper Service	No	SPL_SL_14-65_Interested Parties
John J.	Carroll	jcarroll@newportpartners.com	Newport Partners, LLC	9 Cushing, Suite 200 Irvine, California 92618	Electronic Service	No	SPL_SL_14-65_Interested Parties
Aakash	Chandarana	Aakash.Chandara@xcenergy.com	Xcel Energy	414 Nicollet Maill 5th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 Southeast 10th St. Bentonville, AZ 72716-5530	Paper Service	No	SPL_SL_14-65_Interested Parties
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	SPL_SL_14-65_Interested Parties
Steve	Coleman	scoleman@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Electronic Service	No	SPL_SL_14-65_Interested Parties
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mark F.	Dahlberg	markdahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Avenue Minneapolis, MN 55403	Paper Service	No	SPL_SL_14-65_Interested Parties
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Dustin	Denison	dustin@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Electronic Service	No	SPL_SL_14-65_Interested Parties
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Curt	Dieren	cdieren@dgrnet.com	L&O Power Cooperative	1302 South Union Street PO Box 511 Rock Rapids, IA 51246	Electronic Service	No	SPL_SL_14-65_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_14-65_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_14-65_Interested Parties
Bill	Droessler	N/A	Izaak Walton League of America-MWO	1619 Dayton Ave Ste 202 Saint Paul, MN 55104	Paper Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mike	Eggl	smeier@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503	Paper Service	No	SPL_SL_14-65_Interested Parties
Kristen	Eide Tollefson	HealingSystems@earthlink.net	R-CURE	P O Box 129 Frontenac, MN 55026	Paper Service	No	SPL_SL_14-65_Interested Parties
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	SPL_SL_14-65_Interested Parties
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Rick	Evans	Rick.Evans@xcelenergy.com	Xcel Energy	404 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303 Minneapolis, MN 55414	Electronic Service	No	SPL_SL_14-65_Interested Parties
Pam	Fergen		Hennepin County Government Center CAO	A2000 300 S. Sixth Street Minneapolis, MN 55487	Paper Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Cathy	Fogale	cfogale@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	SPL_SL_14-65_Interested Parties
Amy	Fredregill	amy@mrets.org	Midwest Renewable Energy Tracking System, Inc.	1885 University Avenue West, #315 St. Paul, MN 55104	Paper Service	No	SPL_SL_14-65_Interested Parties
Lori	Frisk Thompson	lorift@cmpa.org	Central MN MPA	459 S Grove St Blue Earth, MN 56013	Electronic Service	No	SPL_SL_14-65_Interested Parties
Lee	Gabler	Lee.E.Gabler@xcelenergy.com	Xcel Energy	404 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Gary	Garbe	Gary.Garbe@avantenergy.com	Minnesota Municipal Power Agency	200 South Sixth Street Suite 300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Paper Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Darrell	Gerber		Clean Water Action Alliance of Minnesota	308 Hennepin Ave. E. Minneapolis, MN 55414	Paper Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center	2356 University Ave W. Suite 403 St. Paul, Minnesota 55114	Electronic Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_14-65_Interested Parties
Bryan	Gower	N/A	APX, Inc.	224 Airport Parkway Suite 600 San Jose, CA 95110	Paper Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Lloyd	Grooms	lgrooms@winthrop.com	Winthrop and Weinstine	Suite 3500 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_14-65_Interested Parties
Timothy	Gulden	info@winonarenewableenergy.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	SPL_SL_14-65_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_14-65_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_14-65_Interested Parties
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	SPL_SL_14-65_Interested Parties
Sam	Hanson	shanson@briggs.com	Briggs and Morgan, PA	2200 IDS Center 80 South Eighth Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_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_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jack	Hays	jack.hays@westwoodps.com	Westwood Professional Services	7699 Anagram Drive Eden Prairie, MN 55344	Electronic Service	No	SPL_SL_14-65_Interested Parties
Bill	Heaney	billheaney@billheaney.com	IBEW Minnesota State Council	3931 Silver Lake Rd NE St. Anthony Village, MN 55421	Electronic Service	No	SPL_SL_14-65_Interested Parties
Brandon	Heath	bheath@misoenergy.org	MISO Energy	1125 Energy Park Drive St. Paul, MN 55108-5001	Electronic Service	No	SPL_SL_14-65_Interested Parties
John	Helmers	helmers.john@co.olmsted.mn.us	Olmsted County Waste to Energy	2122 Campus Drive SE Rochester, MN 55904-4744	Electronic Service	No	SPL_SL_14-65_Interested Parties
Jared	Hendricks	hendricksj@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	SPL_SL_14-65_Interested Parties
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	SPL_SL_14-65_Interested Parties
Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 6th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Margaret	Hodnik	mhodnik@mpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	SPL_SL_14-65_Interested Parties

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David	Horneck	david.g.horneck@xcelenergy.com	Xcel Energy	1800 Larimer Street Denver, CO 80202	Electronic Service	No	SPL_SL_14-65_Interested Parties
Ashley	Houston			120 Fairway Rd Chestnut Hill, MA 24671850	Paper Service	No	SPL_SL_14-65_Interested Parties
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	SPL_SL_14-65_Interested Parties
Jan	Hubbard	Jan@AppliedEnergyInnovations.org	Applied Energy Innovations, LLC	4000 Minnehaha Avenue South Minneapolis, MN 55406	Paper Service	No	SPL_SL_14-65_Interested Parties
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Steve	Huso	steve.huso@xcelenergy.com	Xcel Energy	G.O. 7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	SPL_SL_14-65_Interested Parties
Ralph	Jacobson	N/A	Innovative Power Systems, Inc.	1413 Hunting Valley Rd Ste 1 Saint Paul, MN 55109-1555	Paper Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dwight	Jelle	dkjelle@gmail.com	Best Power International, LLC	P.O. 5126 Hopkins, MN 55343	Electronic Service	No	SPL_SL_14-65_Interested Parties
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	SPL_SL_14-65_Interested Parties
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	90 South 7th Street Suite #4800 Minneapolis, MN 554024129	Electronic Service	No	SPL_SL_14-65_Interested Parties
Larry	Johnston	lw.johnston@smpa.org	SMMPA	500 1st Ave SW Rochester, MN 55902-3303	Paper Service	No	SPL_SL_14-65_Interested Parties
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	SPL_SL_14-65_Interested Parties
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	SPL_SL_14-65_Interested Parties
Nancy	Kelly	bademailnancyk@eurekarecycling.org	Eureka Recycling	2828 Kennedy Street NE Minneapolis, MN 55413	Paper Service	No	SPL_SL_14-65_Interested Parties

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Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave Lakeville, MN 55044	Paper Service	No	SPL_SL_14-65_Interested Parties
Kerry	Klemm	kerry.r.klemm@xcelenergy.com	Xcel Energy Services, Inc	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
John	Kluempke	jkluempke@winlectric.com	Elk River Winlectric	12777 Meadowvale Rd Elk River, MN 55330	Electronic Service	No	SPL_SL_14-65_Interested Parties
Thomas G.	Koehler	N/A	Local Union #160, IBEW	2909 Anthony Ln Minneapolis, MN 55418-3238	Paper Service	No	SPL_SL_14-65_Interested Parties
Mara	Koeller	mara.n.koeller@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Jon	Kramer	jk2surf@aol.com	Sundial Solar	4708 york ave. S Minneapolis, MN 55410	Electronic Service	No	SPL_SL_14-65_Interested Parties
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Scott	Kurtz	Scott.J.Kurtz@xcelenergy.com	Xcel Energy	825 Rice Street St. Paul, MN 55117	Electronic Service	No	SPL_SL_14-65_Interested Parties
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	SPL_SL_14-65_Interested Parties

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Deborah Fohr	Levchak	dlevchak@bepec.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 585030564	Paper Service	No	SPL_SL_14-65_Interested Parties
Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Mark	Lindquist	N/A	The Minnesota Project	57107 422nd St New Ulm, MN 56073-4321	Paper Service	No	SPL_SL_14-65_Interested Parties
Matthew P	Loftus	matthew.p.loftus@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
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_14-65_Interested Parties
Rebecca	Lundberg	rebecca.lundberg@powerfullygreen.com	Powerfully Green	11451 Oregon Ave N Champlin, MN 55316	Electronic Service	No	SPL_SL_14-65_Interested Parties
Casey	Maccullum	casey@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Paper Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	SPL_SL_14-65_Interested Parties

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 7th St E St. Paul, MN 55106	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mike	McDowell		Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Paper Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Dave	McNary	N/A	Hennepin County DES	701 Fourth Avenue South suite 700 Minneapolis, MN 55415-1842	Paper Service	No	SPL_SL_14-65_Interested Parties
John	McWilliams	jmm@dairynet.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL_14-65_Interested Parties
Valerie	Means	valerie.means@lawmoss.com	Moss & Barnett	Suite 4800 90 South Seventh Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_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_14-65_Interested Parties
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL_14-65_Interested Parties
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Martin	Morud	mmorud@trunorthsolar.com	Tru North Solar	5115 45th Ave S Minneapolis, MN 55417	Electronic Service	No	SPL_SL_14-65_Interested Parties
Ben	Nelson		CMPMA	459 South Grove Street Blue Earth, MN 56013	Paper Service	No	SPL_SL_14-65_Interested Parties
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_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_14-65_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_14-65_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_14-65_Interested Parties
Nick	Paluck	nick.paluck@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
James	Pearson	james.g.pearson@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	Suite 801 25 West Main Street Madison, WI 537033398	Electronic Service	No	SPL_SL_14-65_Interested Parties
Charlie	Pickard	cpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Donna	Pickard	dpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_14-65_Interested Parties
Joseph V.	Plumbo		Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Paper Service	No	SPL_SL_14-65_Interested Parties
Gayle	Prest	gayle.prest@minneapolis.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Paper Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	SPL_SL_14-65_Interested Parties
John C.	Reinhardt		Laura A. Reinhardt	3552 26Th Avenue South Minneapolis, MN 55406	Paper Service	No	SPL_SL_14-65_Interested Parties
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Paper Service	No	SPL_SL_14-65_Interested Parties
Enio	Ricci	ericci@invenergyllc.com	Invenergy LLC	17830 New Hampshire Ave Ste 300 Ashton, MD 20861	Paper Service	No	SPL_SL_14-65_Interested Parties
Trudy	Richter	trichter@rranow.com	Minnesota Resource Recovery Assn.	477 Selby Avenue St. Paul, MN 55102	Paper Service	No	SPL_SL_14-65_Interested Parties
Michelle	Rosier	michelle.rosier@sierraclub.org	Sierra Club	2327 E. Franklin Avenue Minneapolis, MN 554061024	Paper Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Craig	Rustad	crustad@minnkota.com	Minnkota Power	1822 Mill Road PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL_14-65_Interested Parties
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	SPL_SL_14-65_Interested Parties
Raymond	Sand	rms@dairynet.com	Dairyland Power Cooperative	P.O. Box 8173200 East Avenue South LaCrosse, WI 546020817	Electronic Service	No	SPL_SL_14-65_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_14-65_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_14-65_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_14-65_Interested Parties
Kevin	Schwain	Kevin.D.Schwain@xcelenergy.com	Xcel Energy	404 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Dean	Sedgwick	N/A	Itasca Power Company	PO Box 457 Bigfork, MN 56628-0457	Paper Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Gary	Shaver	N/A	Silicon Energy	3506 124th St NE Marysville, WA 98271	Paper Service	No	SPL_SL_14-65_Interested Parties

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Erin	Shea	eshea@silicon-energy.com	Silicon Energy	11168 Sumter Circle Bloomington, MN 55438	Electronic Service	No	SPL_SL_14-65_Interested Parties
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Avenue South Minneapolis, MN 55408	Paper Service	No	SPL_SL_14-65_Interested Parties
Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	SPL_SL_14-65_Interested Parties
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	SPL_SL_14-65_Interested Parties
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_14-65_Interested Parties
Byron E.	Starns	byron.starns@leonard.com	Leonard Street and Deinard	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
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_14-65_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_14-65_Interested Parties

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Deb	Sundin	deb.sundin@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_14-65_Interested Parties
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Paper Service	No	SPL_SL_14-65_Interested Parties
Steve	Thompson		Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Paper Service	No	SPL_SL_14-65_Interested Parties
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Darryl	Tveitbakk		Northern Municipal Power Agency	123 Second Street West Thief River Falls, MN 56701	Paper Service	No	SPL_SL_14-65_Interested Parties
Kari L	Valley	kari.l.valley@xcelenergy.com	Xcel Energy Service Inc.	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
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	SPL_SL_14-65_Interested Parties

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Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800 Owatonna, MN 55060	Electronic Service	No	SPL_SL_14-65_Interested Parties
Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind	618 2nd Ave SE Minneapolis, MN 55414	Electronic Service	No	SPL_SL_14-65_Interested Parties
Scott M.	Wilensky	scott.wilensky@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Daniel	Williams	DanWilliams.mg@gmail.com	Powerfully Green	11451 Oregon Avenue N Champlin, MN 55316	Electronic Service	No	SPL_SL_14-65_Interested Parties
Steven	Wishart	steven.w.wishart@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_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_14-65_Interested Parties
Thomas J.	Zaremba		WHEELER, VAN SICKLE & ANDERSON	Suite 801 25 West Main Street Madison, WI 537033398	Paper Service	No	SPL_SL_14-65_Interested Parties