

**STATE OF MINNESOTA**

**BEFORE THE PUBLIC UTILITIES COMMISSION**

Katie J. Sieben	Chair
Joseph K. Sullivan	Vice Chair
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Valerie Means	Commissioner
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**In the Matter of Updating the Generic Standards for the  
Interconnection and Operation of Distributed Generation      PUC Docket Number E999/CI-16-521  
Facilities Established Under Minn. Stat. §216B.1611**

**Reply Comments of the Institute for Local Self Reliance, Solar United Neighbors, and Cooperative  
Energy Futures**

The Institute for Local Self Reliance (ILSR), Solar United Neighbors (SUN), and Cooperative Energy Futures (CEF) (collectively, ILSR/SUN/CEF) submits these comments in response to the Notice of Comment Period, issued by the Minnesota Public Utilities Commission (Commission or PUC) on November 22, 2023.<sup>1</sup> ILSR/SUN/CEF appreciates the opportunity to offer their perspectives on this topic as the Commission considers next steps to facilitate interconnection of facilities less than 40KW. ILSR/SUN/CEF believes that the questions identified in the Notice cover many important topics related to interconnection and will help the Commission determine appropriate next steps for this proceeding.

**Introduction**

The Commission initiated this discussion to consider changes to the Minnesota Distributed Energy Resources Interconnection Process (MN DIP) in response to Minnesota Law 2023, Ch. 60, Art. 12, Sec. 75 (HF 2310). On September 1, 2023, the Commission sought initial proposals from stakeholders regarding changes to the MN DIP. Proposals were filed on November 1, 2023 by several stakeholders including Xcel Energy (Xcel), Minnesota Solar Energy Industries Association (MnSEIA), and Dakota Electric Association (Dakota). The Commission then asked for comments on those proposals in the Notice issued November 23, 2023. Specifically, the Commission asked for comments on the following topics:

1. Interconnection procedures that allow customer-sited distributed generation projects up to 40 kilowatts alternating current in capacity to be processed according to schedules specified in the

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<sup>1</sup> *In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established Under Minn. Stat. §216B.1611*, Notice of Comment Period, Docket No. E999/CI-16-521 (November 22, 2023) (Notice).

MN DIP, giving such projects priority over larger projects that may enjoy superior positions in the processing queue.

2. Whether the prioritization of these projects include areas where the distribution system is capacity constrained as well as in areas that are not similarly constrained.
3. Whether there are changes to the MN DIP that would be de minimis in nature regarding policy but would update the document to accurately reflect recent changes and references.
4. Are there other issues or concerns related to this matter?

Initial comments were filed on January 19, 2024.

### **About ILSR/SUN/CEF**

The Institute for Local Self-Reliance is a national research and advocacy organization that partners with allies across the country to build an American economy driven by local priorities and accountable to people and the planet. ILSR has a vision of thriving, diverse, equitable communities. To reach this vision, we build local power to fight corporate control.

SUN is a non-profit organization dedicated to creating a clean, equitable, resilient energy system that benefits everyone. Nationally, we have helped 8,650 homes and businesses add more than 72 MW of solar combined. In Minnesota, we have run 22 solar co-ops to help neighbors learn about solar and go solar together at a group price. We have educated thousands of Minnesotans about solar and storage, and have helped homes and small businesses install 2 MW of solar combined. The vast majority of these projects have been less than 40KW, and these comments stem in part from our direct experience with the interconnection process for projects in this size range.

Cooperative Energy Futures (CEF) is a member-owned, democratically run, clean energy cooperative that focuses on subscribing LMI, BIPOC and underserved communities. CEF empowers these communities through saving money on energy bills, building wealth in communities by profit-sharing, and giving these communities power and agency by letting them decide the direction of the cooperative by voting for and becoming members of the board of directors. CEF currently has 8 CSGs (6.8MWs) and over 700 member-owners that receive ARR bill credit rates and approximately 50% of them are low-income families.

### **Comments**

The comments submitted in this initiative focused on the proposals of Xcel, MnSEIA, and Dakota. Reviewing the initial comments, ILSR/SUN/CEF identified four main issues, as described below. As a general matter, the initial proposals and the initial comments highlight a foundational question for the Commission: is there a problem with the current MN DIP that needs to be addressed? In ILSR/SUN/CEF's review of the initial comments, it is not apparent that there is an immediate need to modify the MN DIP.

#### **1. Need for Separate Interconnection Queue for <40KW Projects**

In Xcel's MN DIP Proposal, it recommended that a separate queue be implemented for solar projects sized at less than 40KW to have priority in the interconnection process.<sup>2</sup> Xcel's proposal is based on two arguments: HF 2310 directs utilities to prioritize solar projects less than 40KW and growth of solar necessitates a separate process for projects less than 40KW. MnSEIA also proposed a two-queue system, but in its Comments clarified that a separate queue that would only be applied on congested feeder

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<sup>2</sup> Xcel Minnesota, Proposed Modifications to MN DIP, Docket No. 16-521 (November 1, 2023) (Xcel Initial Proposal).

rather than applied generally, as proposed by Xcel, would be a more targeted solution.<sup>3</sup> Furthermore, this queue would only apply to projects not sized to load, which is defined by MnSEIA as solar installed up to “200% of the reasonably expected average annual total consumption of electricity.”<sup>4</sup>

Comments on these proposals generally supported a two-queue proposal, with certain caveats. MnSEIA reiterates its suggestion that a second queue is only needed for constrained feeders and that Xcel’s project size limitation of 120% of annual demand “will likely not be sufficient to even meet load.”<sup>5</sup> The Department of Commerce (Department or DOC) identified that a two-queue solution is not needed for every utility as not every utility is seeing the same amount of interconnection requests as Xcel.<sup>6</sup>

ILSR/SUN/CEF agrees with the concerns raised by MnSEIA and the Department about the two-queue proposal by Xcel and Dakota. ILSR/SUN/CEF agrees that this issue seems limited to Xcel’s service territory; ILSR/SUN/CEF is unaware of any significant interconnection delays for projects less than 40KW outside of Xcel’s territory. On the other hand, there can be significant delays in interconnecting solar projects less than 40KW in Xcel’s territory especially in areas Xcel claims are congested or when grid upgrades are required by Xcel. This is true even though, as Xcel’s Initial Proposal notes, the average size of solar interconnections less than 40KW is 9KW.<sup>7</sup> While these delays have less to do with the interconnection process itself than with Xcel being unable to provide timely information, including upgrade costs, it remains that for the vast majority of Xcel’s feeders, this size should not pose a problem for interconnection. As such, to the extent the Commission does find merit in Xcel’s proposal for a second queue to support interconnection requests for projects less than 40KW, ILSR/SUN/CEF would support the Department’s recommendation that it be limited to Xcel and done on a pilot basis. ILSR/SUN/CEF believes that it is important that any changes that are to be made are based on evidence and need, not conjecture.

The second part of Xcel’s Initial Proposal to support a two-queue process is that it apply only to projects that do not exceed 120% of premise’s annual load.<sup>8</sup> ILSR/SUN/CEF agrees with MnSEIA and All Energy’s comments that Xcel’s proposal has no basis in statute and is not supported by any analytical or technical support.<sup>9</sup> ILSR/SUN/CEF also agrees with All Energy and MnSEIA that if there is a need for a size limit, that the Commission should adopt MnSEIA’s 200% of annual load proposal.<sup>10</sup> Nevertheless, ILSR/SUN/CEF notes that such a size limit may not even be necessary given the use of technologies, such as energy storage and advanced inverters, that can modify and redirect electricity generated behind the meter before it is exported onto the distribution grid. ILSR/SUN/CEF agrees with the Department when it proposes that, as part of a pilot project for the two-queue system, the pilot also include opportunities to trial alternative technologies and processes that might “offer a viable alternate path to the priority queue proposal, then the administrative and other burdens of the priority queue might not be necessary.”<sup>11</sup>

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<sup>3</sup> MnSEIA Initial Comments at 6 (January 19, 2024).

<sup>4</sup> *Id.* at 4, fn. 4.

<sup>5</sup> *Id.* at 7.

<sup>6</sup> Comments of the Minnesota Department of Commerce at 10-11 (January 19, 2024).

<sup>7</sup> Xcel Initial Proposal at 10.

<sup>8</sup> *Id.* at 8.

<sup>9</sup> All Energy Solar’s Comments 7 (January 23, 2024) (All Energy); MnSEIA Initial Comments at 7.

<sup>10</sup> All Energy Comments at 7; MnSEIA Initial Comments at 7.

<sup>11</sup> Department Comments at 12.

## 2. Xcel's Technical Planning Limit Proposal is Unfounded and Not in the Public Interest

In its Initial Proposal, Xcel proposed to implement a 50% technical planning limit across the entirety of its distribution system ostensibly as a protection for projects less than 40KW to be able to successfully interconnect. ILSR/SUN/CEF agrees with the majority of comments filed that such a proposal should be rejected by the Commission. Specifically, ILSR/SUN/CEF strongly agrees with the Department's finding that Xcel's proposal is "unsupported, discriminatory, and not in the public interest."<sup>12</sup> Xcel's Initial Proposal for its technical planning limit is not based on any evidence that there is an actual need to apply such a draconian limit across the entirety of its distribution system. While ILSR/SUN/CEF appreciates Xcel's concerns about accommodating the future growth of rooftop solar, Xcel provides scant evidence that there is a need for such a drastic step. Xcel's Initial Proposal states that it has 1,082 distribution feeders, yet only identifies "several" capacity constrained feeders.<sup>13</sup> Furthermore, Xcel's justification is based on mathematical estimates over the next 45 years.<sup>14</sup> ILSR/SUN/CEF supports the Department's conclusion that this math is not "well-supported or reasonable," but is "arbitrary."<sup>15</sup> ILSR/SUN/CEF agrees with Nokomis Energy that the technical planning limit "is not even advanced as a matter of engineering judgment, necessary for safety or reliability, but rather as a policy determination."<sup>16</sup> This conclusion is supported by the Department stating "the proposal is unabashedly one of policy, not engineering."<sup>17</sup>

As Nokomis and All Energy note, Xcel's proposal fails to consider that technology changes and adapts, along with customer usage and preferences. Nokomis notes that Xcel's technical planning limit proposal is "unsupported by any meaningful data, and skips a number of important considerations, like load growth through electrification, distributed generation system upgrades, and improvements in inverter technologies."<sup>18</sup> Additionally, All Energy's comments helpfully notes that Xcel ignores the role of storage.

As the comments on Xcel's technical planning limit highlight, Xcel provided no engineering or technical basis for such a proposal. The electric grid is not a static object, unmoving as the world around it advances; Xcel's policy would lead to delays in meeting the state's clean energy mandate, increase costs to customers, and needlessly harm the solar market. To echo the Department's comments, Xcel's proposed technical planning limit is unsupportable and should be rejected.<sup>19</sup>

## 3. Need for Better Data

In reviewing the initial comments, ILSR/SUN/CEF notes that there is an additional problem underlying Xcel's proposal – and Dakota's, but to a lesser extent: a lack of good data.<sup>20</sup> For context, for many years the ability of a local solar project to interconnect was based on traditional assumptions about hosting capacity that reflected a dearth of data about the distribution system. One such assumption was a "15% rule" that limited the hosting capacity of a distribution feeder to 15% of peak load, assuming that the minimum daytime load was roughly equal to 30% of the feeder's peak capacity. However, with better data, federal and state regulators shifted to evidence-based limits, by aligning the minimum load forecasts with solar output and gathering actual load data from distribution feeders. They concluded

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<sup>12</sup> *Id.* at 13.

<sup>13</sup> Xcel Initial Proposal at 4, 10-11.

<sup>14</sup> *Id.* at 10.

<sup>15</sup> Department Comments at 13.

<sup>16</sup> Nokomis Energy Comments at 2 (January 19, 2024) (Nokomis).

<sup>17</sup> Department Comments at 13.

<sup>18</sup> *Id.* at 3.

<sup>19</sup> *Id.* at 13.

<sup>20</sup> *See, e.g., Id.* at 11 (Xcel "provides some data regarding thirteen capacity-constrained feeders").

that distribution systems can operate at different levels up to 100% of minimum load.<sup>21</sup> Accurate and regular distribution hosting capacity updates could provide Xcel and the Commission with data that will allow for engineering judgments of actual system constraints. An underlying problem with Xcel's proposals is that its hosting capacity map is that is not updated often enough. As a result, Xcel's proposal is one-sided, aimed at limiting opportunities for solar.

This is apparent when considering that Xcel's proposed solutions is to limit access to its distribution system, across the entirety of its system, even though it provided scant evidence that there is a widespread problem, and that the investments necessary to address such capacity constraints are entirely on Xcel's distribution system.<sup>22</sup> Indeed, as noted by All Energy, Xcel's solar adoption forecast used in this proceeding is vastly different from the forecast used in its Integrated Distribution Plan.<sup>23</sup> Instead, Xcel's proposal seeks to shift more and more costs onto solar developers, even when there does not appear to be any evidence that solar is causing those costs.<sup>24</sup>

We recommend that the Commission avoid reliance on proposals without sufficient evidence, and consider the value of requiring monthly hosting capacity updates as a tool to address this and related distribution capacity challenges.

#### 4. Different Interpretations of "Priority"

Xcel and Dakota's initial proposals rest on the interpretation of one word in the final clause of HF 2310, Article 12, Section 75:

No later than September 1, 2023, the commission shall open a proceeding to establish interconnection procedures that allow customer-sited distributed generation projects up to 40 kilowatts alternating current in capacity to be processed according to schedules specified in the Minnesota Distributed Energy Resources Interconnection Process, giving such projects **priority** over larger projects that may enjoy superior positions in the processing queue. (emphasis added)

ILSR/SUN/CEF agrees with Nokomis' interpretation of the term priority. Nokomis notes that the final clause of HF2310 addresses the process for reviewing interconnection requests, and does not direct Xcel to reserve capacity on the system.<sup>25</sup> The MN DIP requires the utilities to process interconnection requests as they are received, which may mean that projects less than 40KW may need to wait for other projects, including large community solar gardens, to be processed first. This can result in delays for projects and can be frustrating for small projects that will have little, if any, impact on the hosting capacity of the feeder, yet need to wait for other projects ahead of it to finish. ILSR/SUN/CEF does not believe that small projects should necessarily jump to the front of the line, nor does ILSR/SUN/CEF believe that a utility should apply a capacity reservation limit across the entirety of its system that shuts out other projects to ensure that small projects have priority. Instead, ILSR/SUN/CEF believes that to the extent there is available capacity, then the existing MN DIP process should proceed as adopted. Small projects that are eligible for expedited review would continue to be processed accordingly. To the

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<sup>21</sup> Farrell, John. Rooftop Revolution. (Institute for Local Self-Reliance, March 2012), pages 18-19.

<https://ilsr.org/rooftop-revolution-changing-everything-with-cost-effective-local-solar/>

<sup>22</sup> Xcel Initial Proposal at 4.

<sup>23</sup> All Energy Comments at 6.

<sup>24</sup> *Id.*

<sup>25</sup> Nokomis Comments at 2.

extent that there are congested feeders or sufficient interconnection requests on a feeder where a project less than 40KW seeks to interconnect that it is becoming congested, that line should be identified in advance, either via a notice upon starting the interconnection process or the hosting capacity map, so that developers are aware of such a constraint. Regular hosting capacity updates could alleviate the administrative burden on Xcel by ensuring such information is available before developers enter into the interconnection queue.

#### 5. Suggestions for Pilot

The Department recommended that Xcel's two-queue proposal be piloted for eighteen to twenty-four months and sought comments from stakeholders on the construction of this pilot.<sup>26</sup> ILSR/SUN/CEF welcomes the opportunity to provide its perspectives on this pilot. Specifically, ILSR/SUN/CEF recommends the following:

- a. The pilot should consider alternative processes and procedures for interconnection. For example, the pilot should investigate greater use of cluster studies to facilitate multiple interconnection requests at one time, use of storage and other advanced technologies (like advanced inverters) to mitigate delays and system upgrades, and consider options from other states that may facilitate interconnection;
- b. Identify any changes necessary to the MN DIP; and,
- c. Model impacts of systems less than 40KW on feeders with different levels of capacity to determine effects on system operations.

#### **Recommendations**

ILSR/SUN/CEF recommends the following:

1. Reject proposals to create two-queues and instead proceed with the existing MN DIP process as adopted, processing small projects that are eligible for expedited review accordingly;
2. In the alternative, allow the two-queue proposal to be trialed on a pilot basis only in the Xcel territory and only for capacity constrained feeders;
3. Reject Xcel's technical planning limit proposal;
4. Direct Xcel to pilot alternative technologies and processes that may avoid the need for a two-queue process; and,
5. Direct Xcel to provide monthly updates for its hosting capacity analysis.

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<sup>26</sup> Department Comments at 12.

## Conclusion

ILSR/SUN/CEF appreciates the opportunity to submit these reply comments. The issues identified in this proceeding will have lasting effects on the success of Minnesota's solar (and storage) marketplace. The Commission should reject efforts to throttle this marketplace based on unsupported, unfounded, discriminatory, and arbitrary arguments. The pathway to 100% will be winding and will rely on many different technologies; Minnesota should embrace resource diversity and expect it to continue. Creating a priority pathway for projects less than 40KW does not mean upending the MN DIP, but, rather, ensuring that it continues to work effectively by measuring the effects of these projects on the grid. The Commission can ensure that Minnesota's solar marketplace continues to grow and thrive, consistent with the state's 100% law, by ensuring that these projects continue to have access to the grid and are not unduly delayed by burdensome policy choices.

ILSR/SUN/CEF thanks the Commission for the opportunity to comment on this important topic.

Respectfully submitted,

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February 2, 2024

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing pleading has this day been served on each person whose name appears on the Official Service List for E999/CI-16-521, as attached.

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

xx electronic filing

/s/ Bobby King  
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Dated at Minneapolis, Minnesota  
This 2<sup>nd</sup> Day of February 2024.

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sarah	Groebner	sgroebner@redwoodelectri c.com	Redwood Electric Cooperative	60 Pine St  Clements, MN 56224	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Cody	Gustafson	cgustafson@mnpower.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tom	Guttormson	Tom.Guttormson@connexu senergy.com	Connexus Energy	14601 Ramsey Blvd  Ramsey, MN 55303	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Natalie	Haberman	townsend@fresh- energy.org	Fresh Energy	408 St Peter St # 350  St. Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
James	Haler	jhaler@southcentralelectric .com	South Central Electric Association	71176 Tiell Dr P. O. Box 150 St. James, MN 56081	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Donald	Hanson	dfhanson@ieee.org	Solar Photovoltaic Systems	P. O. Box 44579  Eden Prairie, MN 55344	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John	Harlander	john.c.harlander@xcelener gy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Adam	Heinen	aheinen@dakotaelectric.co m	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jared	Hendricks	jared.hendricks@owatonna utilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW  Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative	60 Pine Street  Clements, MN 56224	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane  Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Hunter	Dean.Hunter@state.mn.us	Minnesota Department of Labor & Industry	443 Lafayette Rd N  St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue  Saint Paul, MN 55104	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58501	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236  Excelsior, MN 55331	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robert	Jagusch	rjagusch@mmua.org	MMUA	3025 Harbor Lane N  Minneapolis, MN 55447	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Chris	Jarosch	chris@carrcreekelectricservice.com	Carr Creek Electric Service, LLC	209 Sommers Street North  Hudson, WI 54016	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248  Madison, SD 57042	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kevin	Joyce	kjoyce@tesla.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ralph	Kaehler	Ralph.Kaehler@gmail.com		13700 Co. Rd. 9  Eyota, MN 55934	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC	4710 Blaylock Way  Inver Grove Heights, MN 55076	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Jack	Kegel	jkegel@mmua.org	MMUA	3025 Harbor Lane N Suite 400  Plymouth, MN 55447-5142	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tom	Key	tkey@epri.com	EPRI	942 Corridor Park Blvd  Knoxville, TN 37932	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power	1725 US Hwy 12 E  Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Corrina	Kumpe	ckumpe@mysunshare.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn	1725 Highway 12 E Ste 100  Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200  Wayzata, MN 55391	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products	PO Box 108  Springfield, MN 56087	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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William	Lovelace	wlovelace@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S  Grand Forks, ND 58201	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156  Latham, NY 12110-1156	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Logan	O'Grady	logrady@mNSEIA.org	Minnesota Solar Energy Industries Association	2288 University Ave W St. Paul, MN 55114	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248  Madison, SD 570420248	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Bethany	Owen	bowen@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Cezar	Panait	Cezar.Panait@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive  Belmont, CA 94002	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company	PO Box 496 215 S. Cascade St. Fergus Falls, MN 565370496	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Susan	Peirce	Susan.Peirce@state.mn.us	Department of Commerce	85 Seventh Place East  St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Donna	Pickard	dpickardgsss@gmail.com	Genie Solar Support Services	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Elizabeth	Psihos	elizabeth.psihos@idealenergies.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S  Minneapolis, MN 55406	Paper Service	No	OFF_SL_16-521_Official Service List PUC
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electric Assn.	PO Box 529 24386 State Highway 4 Sleepy Eye, MN 56085	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kenric	Scheevel	Kenric.scheevel@dairylandpower.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, WI 54602	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Matthew	Schuerger	matthew.schuerger@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Cooperative Electric	22636 U.S. Hwy. 59 Worthington, MN 56187	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Assn.	24386 State Hwy. 4, PO Box 529  Sleepy Eye, MN 56085	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Robyn	Sonstegard	robyn.s@northstarelectric.coop	North Star Electric Cooperative, Inc.	PO BOX 719 Baudette, MN 56623	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities	208 S Walnut Ave PO BOX 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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