



414 Nicollet Mall
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April 21, 2014

—Via Electronic Filing—

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

RE: REQUEST FOR RECONSIDERATION
VALUE OF SOLAR METHODOLOGY
DOCKET NO. E999/M-14-65

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, respectfully submits this Motion for Reconsideration to the Minnesota Public Utilities Commission's April 1, 2014 Order Approving Distributed Solar Value Methodology in this docket.

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 me at christopher.b.clark@xcelenergy.com or (612) 215-4593 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

MOTION FOR RECONSIDERATION

Northern States Power Company, doing business as Xcel Energy, respectfully submits this Motion for Reconsideration to the Minnesota Public Utilities Commission's April 1, 2014 Order Approving Distributed Solar Value Methodology in this docket. At the outset, we note that these comments should be viewed from a context that we have stated before – the Company supports the development of solar in and for the State of Minnesota. However, we remain concerned that the recently adopted Value of Solar (VOS) methodology may tip the balance more in favor of stimulating solar development than assuring moderated cost impacts for all customers, regardless of their participation in solar offerings.

We submit this motion after considering our experience with the roll-out of other renewable technologies in the State of Minnesota. As a system resource, all customers participated in the costs and benefits of wind power. For example, we saw an initial imbalance with the valuation of wind projects as compared to subsequent market data. As experience was gained with wind, the developmental costs declined and as a result the costs to our customers have also declined. We believe a similar outcome can be achieved with solar as well if the combination of incentives and a more market-based VOS are combined. The need to get this right today is that unlike wind, most of our customers will experience the costs of distributed generation, but not the benefits.

With that said, we appreciate the unique procedural posture presented by the VOS statute. Specifically, the Commission is required to give deference to the Department's methodology so long as it is reasonable, and a change to the VOS methodology can only be achieved with the Department's consent. But we believe this Order can be reconsidered pursuant to the Commission's rules. We further believe there is a basis for us to bring this motion as we expect substantive discussions

to occur soon about whether or not the VOS should apply to our Community Solar Gardens.

We believe the standard to reconsider the Order has been met in this instance not because of any one reason but for a more holistic consideration – the methodology results in a rate that may go too far in terms of valuing solar’s benefits from an actual and avoided cost basis. Our current projection of the VOS rate is nearly double the approach we set forth, and is nearly triple our current qualified facility rate for other distributed generation. We believe our approach is fair, as it is greater than the all-in cost of a natural gas combined cycle unit (both including the midpoint of the expected environmental costs of carbon). Like solar, a natural gas combined cycle unit provides both energy and capacity. This price discrepancy provides context for the reason why we believe that a motion for reconsideration is appropriate.

Further examination of four methodological areas, which were disputed during this proceeding, helps illustrate our concern that the VOS does not accurately capture our true avoided cost.

1. Avoided Generation Capacity Costs

While we believe the Commission’s modification of avoided generation capacity costs is an improvement over the Department’s method, it presumes solar will avoid more capacity than the amount legislatively mandated. Even though this may be true over the long run as solar pricing improves, it is not the case today. This means the VOS method, as approved, pays more for avoided generation capacity than the long run expected value. Additionally, the approved VOS method assumes that contracted resources, which are often renewed, are part of the avoided cost. However, these resources do not avoid growth in electric demand yet greatly influence the price.

2. Avoided Environmental Cost-Carbon Value

We understand the Commission has approved the Department’s use of the Federal Government’s “Social Cost of Carbon” (SCC) for the limited purpose of determining the VOS. We continue to believe, however, another value, such as the midpoint of the Commission’s carbon proxy value, would serve as a better proxy for determining the avoided environmental costs. All of the costs in the statute are focused on costs customers may face as utility customers. The SCC is an estimate of the potential economic damages associated with, among other things, increases in carbon emissions. Its purpose is to estimate the climate benefits associated with federal rulemakings on a provisional basis, not to be a precise value in resource planning or ratemaking. Thus, the Commission’s midpoint carbon proxy value, on the other hand, is an approximation of the potential real costs we might expect to pay under a

future carbon regulation framework, and was established as part of an extensive statewide proceeding.

3. Avoided Transmission Capacity Cost

Another example of how our experience influenced our approach is with the calculation of the avoided transmission capacity cost. Since the transmission investments that are most likely to be avoided by solar are those associated with a natural gas unit, we recommend valuing the avoided transmission cost using the costs associated with the interconnection of planned natural gas units. While we appreciate the Department's thinking in determining avoided transmission capacity cost from the MISO network integration service rate, we do not think this approach captures the marginal cost for avoided transmission capacity.

4. Avoided Distribution Capacity Cost- Load Match Analysis

Finally, one last example to support our perspective concerns the Load Match Analysis methodology used in determining the avoided distribution capacity cost. Our recommendation is to use an average peak load reduction (PLR) based on our unique customer mix. This calculation recognizes that customer classes often do not peak at the same time on the distribution system as a whole and therefore better reflects the true deferred costs of distributed solar on our system. The approved methodology's PLR does not reflect the variability of solar or recognize that customer classes have different load peaks because it is based on the coincident system generation peak.

In closing, the VOS rate should accurately reflect the benefits and costs of adding distributed solar to the grid. The legislature also wanted to balance this need with the desire to ensure the solar industry has the support it needs to grow. To accomplish these goals, we believe the Legislature added financial incentives to ensure the solar industry would have what it needed to move forward. From our perspective, it is necessary to balance competing interests, like providing the opportunity for success for solar developers, while also protecting against inequity between solar and non-solar customers. In this case, we think application of traditional avoided cost principles should tip the balance more toward the non-solar customers as we expand distributed solar further in Minnesota.

Dated: April 21, 2014

Northern States Power Company

CERTIFICATE OF SERVICE

I, Theresa Sarafolean, 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 21st day of April 2014

/s/

Theresa Sarafolean
Administrative Assistant

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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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
Deborah Fohr	Levchak	dlevchak@bepc.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
Tim	Lindl	tlindl@kfwlaw.com	Keyes, Fox & Wiedman LLP	436 14th St, Ste 1305 Oakland, CA 94612	Electronic Service	No	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

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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	MacCallum	casey@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Electronic 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
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
Jennifer	Martin	N/A	Center for Resource Solutions	1012 Torney Ave, 2nd Floor San Francisco, CA 94129	Paper 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

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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@dairy.net.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
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

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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
Donna	Pickard	dpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_14-65_Interested Parties
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	SPL_SL_14-65_Interested Parties
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	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
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
Michelle	Rosier	michelle.rosier@sierraclub.org	Sierra Club	2327 E. Franklin Avenue Minneapolis, MN 554061024	Paper Service	No	SPL_SL_14-65_Interested Parties
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

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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	Paper 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
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
Anne	Smart	anne@allianceforsolarchoice.com	The Alliance for Solar Choice	595 Market St, 29th Floor San Francisco, CA 94105	Paper Service	No	SPL_SL_14-65_Interested Parties

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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
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

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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
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
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
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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
Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South Walnut PO 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

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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	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	Suite 801 25 West Main Street Madison, WI 537033398	Electronic Service	No	SPL_SL_14-65_Interested Parties