

**State of Minnesota
Before the Public Utilities Commission**

Katie Sieben	Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of Xcel Energy's Tariff Revisions
Updating Community Solar Garden Tariff
Providing Additional Protection in
Subscription Eligibility

Docket No. E002/M-21-695

In the Matter of the Petition of Northern
States Power Company, D/B/A Xcel Energy, for
Approval of its Proposed Community Solar
Garden Program

Docket No. E002/M-13-867

Initial Comments of the Citizens Utility Board of Minnesota

The Citizens Utility Board of Minnesota ("CUB") submits these Initial Comments in response to the Commission's February 9, 2024 Notice of Comment Period¹ (the "Commission Notice") regarding customer protections for tenants in premises that utilize the "Building Subscription Model."² We appreciate the efforts of Xcel Energy ("Xcel") and the Department of Commerce ("the Department") to propose changes to Xcel's billing system to address the concerns raised in this docket. As discussed below, we recommend that Xcel's January 16, 2024 Compliance Filing be approved. However, we also recommend that the Commission address potential complications with the *In Care of Billing* proposal. It is our understanding that Energy CENTS Coalition ("ECC") intends to propose some additional tariff language in initial comments that would make the *In Care of Billing* proposal more effective in addressing some of the concerns raised in this docket. We intend to respond further to ECC's proposal in reply comments.

¹ *In the Matter Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Notice of Comment Period, Docket No. E002/M-21-695 (Feb. 9, 2024) ("Commission Notice").

² See *In the Matter Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, CUB Initial Comments, Docket No. E002/M-21-695 (Dec. 21, 2022), p. 2. ("Under a Building Subscription Model, the landlord becomes the customer of record for the tenants' meters; that is, the landlord or its agent acts as a re-biller, receiving all the tenants' CSG charges and credits as well as Xcel electricity bills for the entire building. The landlord then provides a single bill to each tenant which often combines rent, CSG costs and credits, and any remaining electricity service charges.")

I. PROCEDURAL HISTORY

On September 23, 2021, Northern States Power Company, d/b/a Xcel Energy (“Xcel”), Energy CENTS Coalition, Mid Minnesota Legal Aid, and CUB (the “Joint Petitioners”) filed a joint petition proposing certain modifications to Xcel’s tariffs that, we believed, would help ensure tenants in rental premises utilizing the Building Subscription Model would retain access to affordability programs and other consumer protections.³ On June 24, 2022, the Commission issued an order denying the petition but requiring Xcel to take certain actions—including convening a stakeholder group—to help address the concerns raised in the Joint Petition. Specifically, Order Point 2b of the June 24, 2022 Order required Xcel to “propose a modification to its tariffs for the [PowerON, Medical Affordability, Gas Affordability, and Low-Income Discount Programs (the “Affordability Programs”)] to allow low-income renters who are subject to third-party billing to access these programs.”⁴

In the stakeholder process that followed, stakeholders disagreed over the feasibility of adjusting Xcel’s Affordability Program tariffs to accommodate the Building Subscription Model. Several parties, including CUB, proposed that Order Point 2b be re-opened to consider other alternatives. In an August 11, 2023 Order, the Commission: (1) approved certain tariff modifications proposed by Xcel (and as further modified by the Commission); (2) agreed to reopen Order Point 2b; and (3) required Xcel to work with the Department to propose improvements to Xcel’s billing system that would help accomplish the objectives of recent community solar garden (“CSG”) legislation and of Order Point 2b (i.e., to allow low-income renters who are subject to third-party billing to access affordability programs).⁵ The Commission required Xcel to report on these latter efforts in a compliance filing.

On January 16, 2024, Xcel filed a compliance filing describing its efforts to work with the Department to develop a workable solution to the concerns raised in this docket. In that filing, Xcel proposes an *In Care of Billing* option that “allows the customer’s bill to be sent to a landlord or third-party re-biller while maintaining the account in the customer’s name.”⁶ Xcel further describes this option as follows:

If a customer chooses to not Opt-In to the CSG where the landlord is the named customer on the Company account, and therefore the tenant maintains their Xcel Energy account in their name, [then] the tenant can enroll in our expanded In Care of Billing process to allow the landlord to receive copies to their monthly utility bills. In this way, the tenant receives the benefits of our Affordability Programs, receives the benefits of participating in a CSG, and

³ *In the Matter Xcel Energy’s Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Joint Petition, Docket No. E002/M-21-695 (Sept. 23, 2021)

⁴ *In the Matter Xcel Energy’s Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Order Denying Petition, Addressing Low-Income Energy Assistance Programs and Requiring Further Proceedings, Docket No. E002/M-21-695 (June 24, 2022).

⁵ *In the Matter of Xcel Energy’s Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Order Approving Compliance Filing and Proposed Contract and Tariff Revisions, Docket No. E-022/M-21-695 (Aug. 11, 2023), Order Point 3.

⁶ *In the Matter of Xcel Energy’s Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Compliance Filing, Docket No. E-022/M-21-695 (Jan. 16, 2024) (“Compliance Filing”), p. 2.

maintains the customer protections afforded to the tenant under the utility regulatory compact while still being able to access and print their monthly bill through MyAccount.⁷

To implement this option, Xcel proposes modifications to its existing “Third-Party Notification” form.⁸ Though Third-Party Notification already allows parties named on the Third-Party Notification form to receive duplicate copies of disconnection notices sent for non-payment of bills, an *In Care of Billing* option would go further by authorizing a designated landlord or third party “to receive full billing detail on the account within [Xcel’s] billing system as well as replace the primary mailing address for billing statements with the landlords designated address but maintain the tenant as the named customer on the account.”⁹ (Notably, under such an arrangement only one hard copy bill would be sent to the landlord or re-biller; customers would not receive a duplicate hard copy but would be able to access the bill online through MyAccount.¹⁰) Xcel also is modifying its billing processing for PowerON customers so that the PowerON budget amount will be reflected on such customers’ bills.¹¹

The Commission’s latest Notice of Comment Period calls for comments on whether the Compliance Filing should be approved and on any concerns about the contents thereof.

II. ANALYSIS

1. The Commission should approve Xcel’s January 16, 2024 Compliance Filing.

The Commission’s August 11, 2023 Order required Xcel to work with the Department to make “programmatic improvements to [Xcel’s] billing system to accomplish the goals of Community Solar Garden legislation passed in the 2023 legislative session, and the goals previously set forth in ordering paragraph 2B of the Commission’s June 24, 2022 Order” and to describe those efforts in a compliance filing.¹² The Order also requires Xcel to report on the “necessary changes to its billing system, the incremental costs thereof, an analysis of what data sharing requirements will be necessary, and the estimated costs number of tenants/households that would benefit. The January 16, 2024 Compliance Filing shows that Xcel worked with the Department in an effort to make the improvements contemplated in the August 11, 2023 Order and addresses the Commission’s other reporting requirements. Therefore, we recommend the Commission approve the filing.

We specifically note our appreciation for Xcel working out a way to have the PowerON budget amount reflected on PowerON customers’ bills. This is a simple way to help address some of the confusion discussed in this docket, and we are hopeful it will reduce instances of PowerON customers

⁷ Id. (emphasis added)

⁸ Id. at 5.

⁹ Id.

¹⁰ Id.

¹¹ Id.

¹² *In the Matter of Xcel Energy’s Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility*, Order Approving Compliance Filing and Proposed Contract and Tariff Revisions, Docket No. E-022/M-21-695 (Aug. 11, 2023), Order Point 3.

overpaying for utility service in a rebilling situation. The many PowerON customers who are not subject to utility rebilling will also benefit from seeing their actual payment requirements on monthly Xcel bills.

2. The *In Care of Billing* proposal should not be approved unless some additional concerns are first addressed.

Below is a summary of our updated understanding of how the tariff revisions previously approved in this docket, combined with the *In Care of Billing* proposal described in Xcel's recent compliance filing, would operate, from a tenant's perspective, after the *In Care of Billing* model is implemented:

- Tenant decides to move into an individually-metered unit in a multi-family building that offers tenants the ability to subscribe to a community solar garden ("CSG") via the Building Subscription Model.
- Tenant has the choice to opt in to the CSG associated with the building. Landlord may not require Tenant to participate in the CSG unless Tenant opts in to that arrangement by signing Attachment A to the Landlord Addendum included in Xcel's tariffs.¹³
- If Tenant opts in, then Tenant agrees:
 - Tenant will no longer have an Xcel Energy account in Tenant's name;
 - Tenant may be rebilled for electric charges through the property owner's billing agent or landlord;
 - Tenant will no longer be eligible for any Xcel Energy Affordability Programs and will not have the protection of Commission-enforced regulations governing payment plans, budget billing and payment plan offerings, including medically necessary equipment and Cold Weather Rule protections;¹⁴ and
 - Amounts due under any payment plan then in place with Xcel would be immediately due.¹⁵
 - Tenant authorizes Landlord or re-biller to associate a community solar garden subscription with the Tenant-occupied premises.
- If Tenant chooses not to opt in to the Building Subscription Model, then Tenant, in theory, would have the option to enroll in Xcel's expanded *In Care of Billing* process. (As discussed in more detail below, we believe there are problems with how exercising this option would work in practice.) The intention behind the *In Care of Billing* Proposal is that:

¹³ Xcel Tariff Sheet No. 99.3.

¹⁴ We also believe a tenant who opts-in to the Building Subscription Model loses access to Xcel's conservation and efficient fuel switching programs.

¹⁵ Xcel Tariff Sheet No. 99.3.

- Tenant retains his/her name on the Xcel bill, and thus:
 - i. Tenant retains eligibility for Xcel's Affordability Programs;
 - ii. Tenant retains protection of Commission-enforced regulations governing payment plans, budget billing and payment plan offerings, including medically necessary equipment and Cold Weather Rule protections;
 - Tenant authorizes a landlord or re-biller to receive Tenant's Xcel bill, pay it on Tenant's behalf, then rebill Tenant for that payment;
 - Tenant would not receive a duplicate hard copy of Tenant's bill, but would be able to access Tenant's bill online;
 - Tenant authorizes Landlord or re-biller to associate a community solar garden subscription with the Tenant-occupied premises.
- Finally, a Tenant can opt-out of the Building Subscription Model and/or *In Care of Billing* at any time for any reason.¹⁶ By doing so:
 - Tenant retains Tenant's name on the Xcel bill, and thus:
 - i. Tenant retains eligibility for Xcel's Affordability Programs;
 - ii. Tenant retains protection of Commission-enforced regulations governing payment plans, budget billing and payment plan offerings, including medically necessary equipment and Cold Weather Rule protections;
 - Tenant continues to receive and pay their own Xcel bill;
 - Tenant retains the option to subscribe to a CSG of Tenant's choice, subject to qualification requirements associated with that subscription.

We see some complications with how *In Care of Billing* would apply in practice.

First, the *In Care of Billing* proposal appears to be in conflict with Xcel's recently modified tariffs. According to Tariff Sheet No. 76, the landlord would only be permitted to enter into a CSG subscription associated with a tenant-occupied, individually-metered premises if the landlord complies with the Landlord Addendum found in Tariff Sheet No. 99.1-99.3. That Addendum would require the tenant to opt in to the CSG subscription. This circular requirement would render meaningless the *In Care of Billing* option—at least when it is used to facilitate CSG subscriptions under the Building Subscription Model. As noted above, a tenant who opts in to the Building Subscription Model loses the consumer protections the *In Care of Billing* proposal is designed to help them retain.

Second, the *In Care of Billing* option would not alleviate potential confusion arising when a tenant needs to establish a payment arrangement during the Cold Weather Period pursuant to Minn. Stat. 216B.096, Subd. 5. It is our understanding that Xcel customers needing payment arrangements during the Cold Weather Period negotiate those arrangements verbally with Xcel; the terms of the payment

¹⁶ Xcel Tariff Sheet 99.1, section 3.

arrangements are not reflected on customer bills. This means a landlord/re-biller will continue to charge a re-billed tenant the full balance due unless (i) the tenant informs the landlord/re-biller of the payment arrangement with Xcel and (ii) the landlord/re-biller honors that arrangement. At best, we foresee this scenario being confusing for tenants. First, if the tenant is not receiving bills or other communications directly from Xcel, the tenant may not know she even has the option to call Xcel to negotiate a payment arrangement. If the tenant is aware of that option, she would need to call Xcel to negotiate a payment arrangement, then her landlord or re-biller to communicate the terms of that arrangement. If a landlord or re-biller refuses to accommodate that payment arrangement, then the tenant may not know what recourse is available to her, other than to pay the full amount owed or face a disconnection or eviction.

Third, the *In Care of Billing* option may render the billing process less transparent for consumers with limited access to the internet. As noted in the Compliance Filing, Xcel's billing system can only send one hard copy of the bill. Under the *In Care of Billing* proposal, that hard copy would be delivered to the landlord/re-biller, and the tenant would have access to the bill only through the online MyAccount application. A tenant who receives a monthly bill from their landlord/re-biller, but never receives a bill from Xcel, may not realize that they are Xcel customers—even if they were provided with an explanation when they signed a lease. They may not be aware that they can call Xcel to arrange payment agreements or with other bill payment concerns. Tenants who may be most vulnerable to consumer harm (including low-income and/or elderly tenants) may also be least likely to have reliable internet access.

Finally, even tenants with internet access may still have trouble creating an online Xcel account without a copy of their bill. To associate an online profile with an Xcel account requires both the Xcel account number and the billing zip code (which may be the zip code of the third-party biller's or landlord's office). While we recognize tenants may be able to obtain more information about their bill by calling Xcel, the landlord, and/or re-biller, the additional layer of complexity and burden on the tenant may create confusion.

3. If the Commission approves the *In Care of Billing* model, it should also revise Xcel's tariffs to ensure landlords, re-billers, and tenants understand how that model addresses the concerns raised in this docket.

We have been in communication with Xcel and ECC about the above concerns. It is our understanding that ECC will be proposing some additional modifications to Xcel's tariffs that would accommodate and clarify tenant protections under *In Care of Billing* model by ensuring that tenants who opt in to the Building Subscription Model also are enrolled in *In Care of Billing*. While we look forward to reading this proposal and other parties' comments, we believe Energy CENTS' proposal will provide a helpful middle ground that—while not resolving all concerns raised in this docket— will allow a model substantially similar to the Building Subscription Model, as originally described in this docket, to

continue while also preserving important consumer protections for tenants of buildings utilizing that model.

III. CONCLUSION

Again, we appreciate the efforts of Xcel and the Department to propose changes to Xcel's billing system to address the concerns raised in this docket. We recommend the Commission approve Xcel's January 16, 2024 Compliance Filing. We also recommend the Commission approve additional changes to Xcel's tariffs in order to ensure the *In Care of Billing* proposal included in Xcel's recent compliance filing is most effective in addressing the concerns raised in this docket. We look forward to reviewing others' initial comments and to making additional and/or more specific recommendations in our reply comments.

Sincerely,

March 8, 2024

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Paula	Prahl	paula.prahl@dominiuminc.com	Dominium	2905 Northwest Blvd Ste 150 Plymouth, MN 55441	Electronic Service	No	OFF_SL_13-867_Official
Bridget	Rathsack	bridget.rathsack@burnsvill emn.gov	City of Burnsville, MN	100 Civic Center Parkway Burnsville, MN 55337	Electronic Service	No	OFF_SL_13-867_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_13-867_Official
Micah	Revell	micah.revell@stinson.com	Stinson LLP	50 South Sixth St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_13-867_Official
Jonathan	Roberts	jroberts@soltage.com	Soltage	66 York St 5th Floor Jersey City, NJ 07302	Electronic Service	No	OFF_SL_13-867_Official
Delaney	Russell	delaney@mnipl.org	Just Solar Coalition	4407 E Lake Street Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
Ian	SantosMeeker	ians@ips-solar.com	IPS Solar	N/A	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_13-867_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-867_Official
David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions	2303 Wycliff St Ste 300 St. Paul, MN 55114	Electronic Service	No	OFF_SL_13-867_Official
Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC	233 Park Ave S Ste 201 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
Karl	Sonneman	karl17@hbc.com	Law Office of Karl W. Sonneman	111 Riverfront Suite 202 Winona, MN 55987	Electronic Service	No	OFF_SL_13-867_Official
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_13-867_Official
Ally	Sutherland	asutherland@ighmn.gov	City of Inver Grove Heights	8150 Barbara Avenue Inver Grove Heights, MN 55077	Electronic Service	No	OFF_SL_13-867_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light	N/A	Electronic Service	No	OFF_SL_13-867_Official
Anna	Tobin	atobin@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Zack	Townsend	zachary.townsend@brookfi eldrenewable.com	Brookfield Renewable	200 Liberty St FL 14 New York, NY 10281	Electronic Service	No	OFF_SL_13-867_Official
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_13-867_Official
John	Vaughn	Nik@rreal.org	Rural Renewable Energy Alliance	3963 8th Street SW Backus, MN 55435	Electronic Service	No	OFF_SL_13-867_Official
Robert J.V.	Vose	rvose@kennedy- graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Kevin	Walker	KWalker@beaconinterfaith. org	Beacon Interfaith Housing Collaborative	N/A	Electronic Service	No	OFF_SL_13-867_Official
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_13-867_Official
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Heidi	Winter	hwinter@co.murray.mn.us	Murray County	2500 28th Street PO Box 57 Slayton, MN 56172	Electronic Service	No	OFF_SL_13-867_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	ross.abbey@us-solar.com	United States Solar Corp.	100 North 6th St Ste 222C Minneapolis, MN 55403	Electronic Service	No	OFF_SL_21-695_21-695
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, MN 55405	Electronic Service	No	OFF_SL_21-695_21-695
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Gabriel	Chan	gabechan@umn.edu	University of Minnesota	130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, MN 55455	Electronic Service	No	OFF_SL_21-695_21-695
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-695_21-695
Kevin	Cray	kevin@communitysolaraccess.org	CCSA	1644 Platte St Denver, CO 80202	Electronic Service	No	OFF_SL_21-695_21-695
Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures	3500 Bloomington Ave. S Minneapolis, MN 55407	Electronic Service	No	OFF_SL_21-695_21-695

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-695_21-695
Ron	Elwood	relwood@mnlisap.org	Legal Services Advocacy Project	970 Raymond Avenue Suite G-40 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_21-695_21-695
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John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-695_21-695
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC	4710 Blaylock Way Inver Grove Heights, MN 55076	Electronic Service	No	OFF_SL_21-695_21-695

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Jason	Maur	jason.maur@renesolapower.com	Rehesola Power Holdings, LLC	850 Canal Street 3rd Floor Stamford, CT 06902	Electronic Service	No	OFF_SL_21-695_21-695
Matthew	Melewski	matthew@nokomisenergy.com	Nokomis Energy LLC & Ole Solar LLC	2639 Nicollet Ave Ste 200 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_21-695_21-695
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Patty	O'Keefe	patty.okeefe@sierraclub.org		2525 Emerson Ave S Apt 2 Minneapolis, MN 55405	Electronic Service	No	OFF_SL_21-695_21-695

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Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_21-695_21-695
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-695_21-695
Eric	Pasi	ericp@ips-solar.com	IPS Solar	2670 Patton Rd Roseville, MN 55113	Electronic Service	No	OFF_SL_21-695_21-695
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_21-695_21-695
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_21-695_21-695
Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now	N/A	Electronic Service	No	OFF_SL_21-695_21-695
Paula	Prahl	paula.prahl@dominiuminc.com	Dominium	2905 Northwest Blvd Ste 150 Plymouth, MN 55441	Electronic Service	No	OFF_SL_21-695_21-695
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_21-695_21-695
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-695_21-695
Jonathan	Roberts	jroberts@soltage.com	Soltage	66 York St 5th Floor Jersey City, NJ 07302	Electronic Service	No	OFF_SL_21-695_21-695

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Delaney	Russell	delaney@mnipl.org	Just Solar Coalition	4407 E Lake Street Minneapolis, MN 55407	Electronic Service	No	OFF_SL_21-695_21-695
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-695_21-695
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-695_21-695
Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC	233 Park Ave S Ste 201 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-695_21-695
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_21-695_21-695
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-695_21-695
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-695_21-695
Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light	N/A	Electronic Service	No	OFF_SL_21-695_21-695
Anna	Tobin	atobin@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-695_21-695
Zack	Townsend	zachary.townsend@brookfielddrenewable.com	Brookfield Renewable	200 Liberty St FL 14 New York, NY 10281	Electronic Service	No	OFF_SL_21-695_21-695

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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John	Vaughn	Nik@rreal.org	Rural Renewable Energy Alliance	3963 8th Street SW Backus, MN 55435	Electronic Service	No	OFF_SL_21-695_21-695
Kevin	Walker	KWalker@beaconinterfaith.org	Beacon Interfaith Housing Collaborative	N/A	Electronic Service	No	OFF_SL_21-695_21-695