KEYES, FOX & WIEDMAN LLP

May 6, 2016

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

VIA ELECTRONIC SERVICE

Re: ***In the Matter of a Commission Inquiry into Fees Charged on Qualifying Facilities***

PUC Docket No.: E-999/CI-15-755

Dear Mr. Wolf,

The Energy Freedom Coalition of America ("EFCA") hereby submits its **INITIAL COMMENTS OF THE ENERGY FREEDOM COALITION OF AMERICA** in the above-entitled matter.

EFCA has electronically filed this document with the Commission and is serving a copy on all persons on the official service list for this docket. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 970-531-2525 or at jschlesinger@kfwlaw.com.

Sincerely,

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Enclosure

Cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE COMMISSION'S INQUIRY INTO FEES CHARGED ON QUALIFYING FACILITIES	DOCKET NO. E999/CI-15-755

INITIAL COMMENTS OF THE ENERGY FREEDOM COALITION OF AMERICA

The Energy Freedom Coalition of America ("EFCA") hereby submits its Comments pursuant to the State of Minnesota Public Utilities Commission's ("Commission") Notice of Comment Period ("Notice"), issued December 23, 2015 and the Notice of Extended Comment Period issued February 24, 2016. EFCA is a national advocacy group that promotes the use of distributed energy resources ("DERs"). EFCA members provide DERs such as distributed generation ("DG"), thermal and battery energy storage, micro grids and demand management. Members also provide solar and other renewable generation in all shapes and sizes including products for residential, commercial, government, community solar, and utility scale applications. EFCA's current members include Silevo, LLC, SolarCity Corporation, ZEP Solar, LLC, Go Solar, LLC, 1 Sun Solar Electric, LLC, and Ecological Energy Systems.

EFCA supports the Commission's investigation and encourages it to take prompt action with regard to any fees found to be illegal or inappropriately charged to net metering customers. To the extent that such customers have been paying illegal or inappropriate fees those customers should be fully compensated by their respective utilities and all such fees should be expunged from existing tariffs. For the reasons stated below, EFCA recommends that the Commission strike down any fee imposed on a DG system prior to July 1, 2015 as illegal and contrary to statute. However, even if the Commission finds that some such fees may be allowed by law, it should still find that each of the fees currently at issue are unreasonable. None of the utilities have provided sufficient information through discovery to justify the fees,

nor otherwise met their burden of proof. EFCA looks forward to participating in this proceeding and appreciates the Commission's request for comments. EFCA responds to each of the Commission's inquiries in kind, below.

1. **Is any additional fee imposed on a customer with a distributed generation system interconnected with a cooperative or municipal utility before July 1, 2015, or at any time with a public utility, permissible under Minn. Stat. §216B.164 and/or Minn. Rules, Chapter 7835, including Part 7835.3000?**

No. Prior to July 1, 2015 Minnesota law prohibited all utilities from imposing any additional fees on QFs for electric service beyond those paid by other customers in the same rate class. While several parties made such arguments as to cooperative utilities in Docket No. 15-255, the Commission ultimately ruled that Peoples' Energy Cooperative's fee for QF customers was merely inappropriate, and did not address the legal question of any such fees would be statutorily permissible. EFCA aggress with comments filed in Docket No. 15-255 by the Minnesota Solar Energy Industries Association ("MNSEIA"), Clean Energy Organizations (Fresh Energy, Environmental Law and Policy Center, Institute for Local Self-Reliance, and Minnesota Center for Environmental Advocacy), and The Alliance For Solar Choice ("TASC"). Each of these parties offers compelling legal analyses explaining that *any* additional fee imposed on customers with DG was illegal prior to July 1, 2015. New legislation only allows only coops and municipal utilities to charge additional fixed fees to DG customers after July 1, 2015 and only under certain limited circumstances. To find otherwise would be inconsistent with Minnesota Statutes, Commission rules, Commission precedent, and policies designed to encourage the proliferation of DG.

One of the core principles of net metering is "nondiscrimination," which states that customer-generators should be billed for net consumption at a rate identical to the rate paid by non-generating customers in the same rate class. This widely accepted principle means that no

extra fees or charges should be imposed upon customer-generators who choose to participate in net metering.[1]

Minnesota's cogeneration and small power production statute clearly reflects reflect the "nondiscrimination" principle as to both coops and investor owned Public Utilities. Minnesota Statues Section 216B.164, Subdivision 3(a), which applies specifically to coops and municipal utilities requires that net metering customers of cooperatives "shall be billed for the net energy supplied by the utility *according to the applicable rate schedule* for sales to that class of customer."[2] Section 216B.164, Subdivision 3(c), applying to Public Utilities states that costs charged to net metering customers shall not be "discriminatory in relation to the costs charged to other customers of the utility."[3] The Commission's rules promulgated under this statute further reflect this principle, requiring that customer-generators be billed for net consumption "according to the utility's applicable retail rate schedule."[4]

Federal law also reflects the non-discrimination principle for all qualifying facilities. 18 C.F.R. § 292.305 states that "Rates for sales . . . shall not discriminate against any qualifying facility in comparison to rates for sales to other customers served by the electric utility."[5] The clear takeaway from these examples of Minnesota and federal law is that customer-generators should not be charged differently for utility supplied electricity than non-generating customers.

Section 216B.164 Subdivision 3(c) concerns rates paid for "net input" back into the

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[1] The nondiscrimination principle is recognized as a key component of net metering throughout the country. *See* 220 ILL. COMP. STAT. 5/16-107.5(e) ("An electricity provider shall provide to net metering customers electric service at non-discriminatory rates that are identical, with respect to rate structure, retail rate components, and any monthly charges, to the rates that the customer would be charged if not a net metering customer."); *See also* Interstate Renewable Energy Council, Model Net Metering Rules (2009), Sec. (b)(13), *available at* http://www.irecusa.org/irec-model-net-metering-rules-2009/ ("An Electricity Provider shall not charge a Customer-generator any fee or charge; or require additional equipment, insurance or any other requirement not specifically authorized under this sub-section or the interconnection rules in Section [[reference state interconnection rules here]], unless the fee, charge or other requirement would apply to other similarly situated customers who are not Customer-generators.").

[2] Minn. Stat. § 216B.164 Subd. 3(a) (emphasis added) (2014 and 2015)

[3] *Id*. at Subd. 3(c).

[4] Minn. R. § 7835.3300, Subp. 2.

[5] 18 C.F.R. § 292.305(a)(1)(ii); *See also* 110 FERC ¶ 63,026 (Feb. 9, 2005).

utility system and therefore does not concern charges levied on customers by utilities, such as fixed fees. That is, Section 3(c) refers to situations in which a net metering customer ends a billing period with "net input into the utility system."[6] This is often referred to as "net excess generation" (NEG). Furthermore, Subdivision 3(c) reaffirms the nondiscrimination principle by requiring the Commission "ensure that the costs charged to the qualifying facility are *not discriminatory* in relation to the costs charged to other customers of the utility."[7] Subdivision 3(c) therefore does not authorize an additional fixed charge and expressly forbids levying a fixed charge solely on customer-generators. The Commission has agreed with this interpretation since its 1983 initial Order establishing Rules for net metering and co-generation compensation.[8]

In the past, utilities have identified Section 216B.164, Subdivision 8(b) as support for special DG charges.[9] But this subdivision concerns interconnection and wheeling costs, not costs for electricity service. The Section states, "[n]othing contained in this section shall be construed to excuse the qualifying facility from any obligation for costs *of interconnection and wheeling* in excess of those normally incurred by the utility for customers with similar load characteristics who are not cogenerators or small power producers."[10] Additional language in Subdivision 8(b) reaffirms the "nondiscrimination" principle in the context of "fixed charges." Section 216B.164, Subdivision 8(b) authorizes utilities to charge customer-generators "fixed charges that are normally assessed [to] nongenerating customers."[11] Any DG charge that is explicitly not normally assessed to non-generating customers is therefore contrary to the statute. Limiting fixed charges to those normally assessed to non-generating customers is consistent with

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[6] *See,* § 216B.164, Subd. 3(a) ("In the case of net metering input into the utility system by a qualifying facility . . . compensation to the customer shall be at a kilowatt-hour rate determined under paragraph (c) or (d).").
[7] *Id*. at Subd. 3(c) (emphasis added).
[8] Order at 54. (The Commission's decision in that Order is particularly useful, as staff noted in its Briefing Papers for the People's docket because this section of the statue and the implementing rules have not substantively changed since it was enacted.)
[9] Docket No. E-132/CG-15-255, September 21, 2015, Order at p. 4 (issued September 21, 2015)
[10] § 216B.164, Subd. 8(b). (Emphasis added).
[11] *Id*.

the nondiscrimination principle reflected throughout Chapter 216B.

Furthermore, as the Commission is well aware, a special session of the Minnesota Legislature recently provided cooperatives with the explicit authority, under certain circumstances, to "charge an additional fee to recover the fixed costs not already paid for by the customer through the customer's existing billing arrangement."[12] Any such fees must be "reasonable and appropriate for that class of customer based on the most recent cost of service study."[13] Legislation further requires that "[t]he cost of service study must be made available for review by a customer of the utility upon request."[14] However, this new legislation has an effective date of July 1, 2015 "and applies to customers installing net metered systems after that day."[15] Certain DG fees are now allowed for cooperatives and municipal utilities under state law when they are properly justified, but they can only apply to systems installed after July 1, 2015. DG fees that were imposed prior to the grant of this authority are illegal. The legislatures grant of this additional authority is further indication that any similar fees prior to its enactment were illegal.

In conclusion, the Commission need not expend its time and resources evaluating the additional topics open for comment in this proceeding. The statutory analysis presented above is consistent with Minnesota's net metering policies for decades. Questions surrounding what fees are allowed under recent statutory amendments for coops and municipal utilities are properly considered in other Commission dockets.[16] The interpretation is consistent with the non-discrimination principle and is consistent with the mandate that the Commission construe the cogeneration statute "in accordance with its intent to give the maximum possible encouragement to cogeneration and small power production consistent with protection of the ratepayers and the

[12] § 216B.164, Subd. 3 (a) (2015)
[13] *Id.*
[14] *Id.*
[15] H.F. No. 3, 2015 First Special Session, Sec. 21.
[16] *See*, Docket Nos. 16-9; 16-240 and 16-241.

public.[17]

2. If an additional fee is not directly prohibited by relevant statutes or rules, what factors should the Commission consider in determining whether an additional fee charged by or proposed by a utility is permitted and is reasonable?

Relevant statutes and rules prohibit all of the fees at issue in this Docket for all of the reasons stated above. Therefore, EFCA does not propose to offer any specific factors to evaluate their permissibility since all are impermissible.[18] Nevertheless, out of an abundance of caution EFCA did attempt to evaluate whether each of the six utility fees at issue were cost based, consistent with generally accepted ratemaking principles and consistent with the concept of "reasonable rates" required by statute.[19] As detailed below, even if the fees were legal in the first place, each of the six fees fails to meet its burden to provide sufficient justification to determine that any of them are reasonable.[20]

While utilities provided some information responsive to Staff's information requests ("IRs"), none provided sufficient information to fully analyze the reasonableness of any of the six utility rates at issue. EFCA found certain responses to the Staff IRs to be incomplete and therefore, on March 31, 2016 EFCA propounded additional discovery on each of the six utilities to carry out its investigation and to inform the below comments.[21] Unfortunately EFCA did not receive any response from five of the six utilities, despite our attempts to follow-up.[22] Northern States Power ("NSP" or "Xcel") provided the only response by sending an email to EFCA's attorney on April 21, 2016 stating that it did not intend to answer the requests absent EFCA

[17] 216B.164, Subd. 1
[18] Fees for interconnection, wheeling and other non-consumptive services are not at issue in this proceeding.
[19] 216B.03
[20] 216B.164, Subd. 5.
[21] All six of EFCA's IR's are included in Attachment A.
[22] Attorney for EFCA sent a follow-up email on April 18, 2016 requesting that each of the six utilities advise when they expected to generate responses, included as Attachment B.

formally becoming a party to the docket.[23] Given the short timeframe since the receipt of that email and the press of the comment deadline, EFCA has not yet taken such action.

Nevertheless the burden of proof to justify a rate, or to resolve a dispute regarding rates for net-metered customers falls upon each utility.[24] For the reasons states below, none of the six utilities have met this burden.

3. Is the additional monthly fee imposed by Connexus Energy permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?

No. For all of the reasons stated above, no additional fixed fee charged to customers with QFs for the consumption of electricity is permissible under Minnesota statutes and rules. However, even if such fees were legal, Connexus Energy ("Connexus") has failed to justify the reasonableness of its fee.

Connexus charges a $2.65/month fee to DG customers, which it claims is based on the incremental cost between a standard meter and a bi-directional meter.[25] Connexus says that maintenance costs for bi-directional meters are equivalent to those of a standard meter.[26] However, the company admits that they do not track operations and maintenance costs for bi-directional meters and did not provide any further evidence to support its claims regarding such costs.[27]

Similarly, Connexus says it does not track the administrative costs for bidirectional meters, yet it claims, "there are additional expenses related to billing and customer service" without providing any supporting evidence.[28] Instead, the company uses a weighting factor to allocate the administrative costs and applies a weighting of 1.5 for bi-directional meters (where

[23] Included as Attachment C.
[24] § 216B.164, Subd. 5.
[25] Conexus Response to Notice Question 1.
[26] Conexus Response to IR PUC #3.
[27] *Id.*
[28] *Id.*

the standard meter is weighted at 1).[29] The company provides no evidence that this weighting factor is appropriate or cost based. Connexus says the additional meter fee is "based on [the] same incremental expense basis that is applied to Load Management rates."[30] However, the company does not provide any evidence or rationale for this basis.

EFCA propounded several data requests on Connexus that would allow EFCA to assess whether Connexus' fee is in fact cost-based. EFCA requested information about how Connexus determined that operations and maintenance ("O&M") costs for bi-directional meters are equivalent to standard meters, and how they determined that administrative costs for bi-directional meters are 1.5 times higher. EFCA was particularly interested how Conexus made these determinations in light of their admissions that they do not track such data. EFCA also sought information about the Company's methodology to determine the appropriate weighting factors to allocate administrative costs and why the metering fee was based on the incremental expense applied to Load Management rates. Unfortunately, Connexus did not respond to EFCA's data request. In the absence of evidence, data and supporting information, Connexus's has failed to show that these fees are reasonable and based on actual costs.

4. Is the additional monthly fee imposed by Goodhue Cooperative Electric Association permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?

No. Even if such fees were legal, Goodhue Cooperative Electric Association ("Goodhue") has failed to justify the reasonableness of its fee. Goodhue charges a $3/month fee on all dual meter set-ups, including load management accounts and DG facilities. The association's February 5, 2016 response to Staff's inquiry did not provide adequate information as to whether the monthly fee is cost-based. The association noted that the average cost of new meters is $190, but provided no additional information about meter's installation costs, "and

[29] *Id.*
[30] *Id.*

ongoing billing and reporting requirements unique to the meter and ongoing administrative/maintenance costs."[31]

Moreover, the Association did not provide their rate and tariff sheets and written policies and procedures applicable to the small power production facilities as requested by IR PUC #5. On March 31, 2016, EFCA asked Goodhue for an itemized account of all the costs included in the $3/month fee, and all calculations and worksheets used to develop the monthly fee. Goodhue did not respond to EFCA's request. In the absence of evidence, data and supporting information, Goodhue has failed to show that its fees are reasonable and based on actual costs.

5. Is the additional monthly fee imposed by Mille Lacs Electric Cooperative permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?

No. Even if such fees were legal, Mille Lacs Electric Cooperative ("MLEC") has failed to justify the reasonableness of its fee. MLEC charges DG customers a $4.50/month fee for metering services. MLEC claims the monthly charge "recoups some of the metering costs including the meter itself, installation of the meter, ongoing billing and reporting requirements unique to the meter, and ongoing administrative/maintenance costs."[32] However, beyond revealing that the average costs of meters can be either $130 or $285, MLEC does not provide any additional information about how it developed the $4.50/month fee. Inexplicably, despite its admission that MLEC has two meter options with two different average costs, MLEC charges all DG customers $4.50/month.

In response to PUC IR # 4, MLEC states that they do not charge DG customers any additional meter-related costs at the time of interconnection. However, MLEC's Administrative Policy No. 518A Rider for Distributed Generation notes that the "Customer will be charged an up-front lump sum of $300 as a contribution towards the cooperative's cost of initial processing,

[31] Goodhue Response to IR PUC # 3.
[32] MLEC Response to IR PUC #3.

site visit, system testing and meter installation."[33] This statement contradicts MLEC's response that the $4.50/month fee covers the installation of the meter, and its claim that it doesn't charge DG customers any meter-related costs at the time of interconnection. Moreover, MLEC does not disclose that customers will be charged $4.50/month in the 518A Rider, instead saying that DG customers would be subject to an undefined additional monthly "access" charge.[34]

Through IRs, EFCA requested from MLEC an itemized account of all the costs included in the $4.50/month fee, and all calculations and worksheets used to develop the monthly fee. MLEC did not respond to EFCA's request. In the absence of evidence, data and supporting information, MLEC has failed to show that its fees are reasonable and based on actual costs.

6. Is the additional monthly fee imposed by Minnesota Power permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?

No. Even if such fees were legal, Minnesota Power has failed to justify the reasonableness of its fee. Minnesota Power assesses a monthly fee to DG owners that is not applied to other customers. For DG customers with facilities less than 40 kW, the monthly charge is $2.55. While the company provided scanned copies walking through the calculation of the fee, there are several questions that remain unanswered. For example, Minnesota Power's $2.55 monthly fee for facilities below 40 kW does not match the company's Monthly Cost calculation of $2.48/month, which it presented in Exhibit I.[35] The $3.57/month fee for systems greater than 40 kW but less than 100 kW similarly does not match the calculated cost of $2.71/month.[36]

Minnesota Power also claims that meters required for DG systems require additional labor, time for testing, and installation than standard meters.[37] However, the company does not provide any evidence or data substantiating its claims. For example, in explaining its per meter

[33] See page 4, under "Terms and Conditions of Service" at # 2.
[34] *Id.* at #5.
[35] Minnesota Power Response to PUC IR #3, Exhibit I, p. 4 of 4, ln. 6.
[36] *Id.*
[37] Minnesota Power Response to PUC IR #3, p. 3.

O&M costs in response to PUC IR #3, Minnesota Power asserts that DG systems require additional distribution and general engineering costs and states "these are calculated at 12% of the cost of the meter plus the installation and removal fee…" But the Company provides no rationale basis to support its two assumptions that 1) DG systems require addition distribution and general engineering cost, or 2) that 12% of the meter cost is a reasonable approximation of those costs. Similarly, the company does not provide evidence or data that support its assumption that 0.17% of the costs of the meter are a sufficient representation of the associated Administration and General Service costs.[38]

On March 31, 2016, EFCA requested through IRs Minnesota Power's calculations with all supporting data (such as administrative costs, meter installation costs, etc.) used to calculate the monthly fee. EFCA also asked the company for data showing that meters required for DG systems require additional labor, installation times compared to standard meters. Minnesota Power did not respond to EFCA's request. In the absence of evidence, data and supporting information, Minnesota Power has failed to show that its fees are reasonable and based on actual costs.

7. Is the additional monthly fee imposed by Otter Tail Power permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?

No. Even if such fees were legal, Otter Tail Power ("Otter Tail") has failed to justify the reasonableness of its fee. In Otter Tail's December 10, 2015 response to the Commission's Notice Requesting Information, the company said it "does not apply charges to distributed generation customers that are not applied to other customers." But in the following sentence, the company says "distributed generation customers are subject to a customer charge for facilities unique to the service..."[39] In other words, while all customers are subject to customer charges,

[38] *Id.* at p. 4.
[39] Otter Tail's Response to Notice at p. 1.

Otter Tail does apply an additional $3.70/month fee.

In response to the Staff's IR #3, Otter Tail provided high-level *approximations* for meter, O&M and administrative costs for bi-directional and standard meters but failed to present sufficient justification for those figures. To assess whether the monthly fees are cost-based, EFCA sent the Company IRs that sought additional information in the form of itemized data and calculations used to determine the monthly fee assessed to DG customers. Otter Tail did not respond to EFCA's request. Without this information EFCA can not determine if Otter Tail's figures are reasonable.

8. Is the additional monthly fee imposed by Xcel Energy permissible under Minnesota statutes and rules? If so, is the amount of the fee reasonable?

No. Even if such fees were legal, Xcel Energy ("Xcel") has failed to justify the reasonableness of its fee. Xcel Energy assesses a monthly fee to DG customers ranging from $3.15/month to $8/month depending on the customer's rate class and connection type. Xcel says that at the majority of locations, two meters are required for DG customers, however the company does not reveal how many or what type of customers this pertains to, and whether customers that do not require an additional meter are assessed the additional monthly fee.[40] Xcel admits that it does not track DG per meter costs for O&M, administrative or other specific cost categories.[41] Nevertheless, the company allocates expenses by the number of customers. Xcel then applies these costs to DG customers twice, as shown in their Attachment A to PUC IRs, apparently because of their claim that *most* customers have two meters.[42] Similarly, Xcel's calculations show that the company is effectively charging DG customers twice for "Customer Accounting and Assistance" expenses, once for each meter. Yet the Company has provided no justification or explanation as to whether these costs actually double as the result of "most"

[40] Xcel Response to PUC IR #1, at p. 1.
[41] *Id.* at PUC IR # 3, at p. 3.
[42] Xcel Response to PUC IR #3, at p. 24.

customers having two meters.

While Xcel provided scanned and electronic copies walking through the calculation of the monthly fees in its response to IR PUC #3, Xcel leaves several questions unanswered. According to Xcel's Attachment provided in response to IR PUC #3, the company's installed costs for "service billing meters" provided on page 1, is identical to the "production meter" cost for each rate category on page 2.[43] EFCA found this unusual and requested additional information through IRs. Furthermore, the production meter is subject to additional programming costs and installation costs while the service billing meters are not. Xcel does not provide data or supporting information about how the additional programming and installation costs are determined. Most disconcerting is that Xcel assesses a 13.88% carrying charge to the programming and installation costs for production meters. This has effectively allowed the company to earn a return on O&M costs, when returns should be strictly limited to capital expenditures (i.e., only the meter costs).

EFCA propounded additional IRs on Xcel to assess the appropriateness of the monthly fees. Questions included how many DG customers had two meters, whether the company tracked DG specific costs, and to provide additional information regarding programming and installation costs associated with meters required for DG customers. EFCA also asked for information regarding the regulatory depreciation life of the meters, and why programming and installation costs are subject to a carrying charge. Xcel Energy did not respond to EFCA's request. In the absence of evidence, data and supporting information, Xcel Energy has failed to show that its fees are reasonable and based on actual costs.

9. Any other docket related issues.

Despite clear statuary direction, these six utilities have illegally assessed additional

[43] *Id.* at PUC IR #3, Attachment A, p. 1-2.

charges to DG customers for several years. These charges should be eliminated and the offending utilities should refund to customers all inappropriately charged fees. Even if any fees for DG customers were legal, the lack of information provided and the disparity in methodology, the wide range of calculated costs and the resulting various fees among the utilities calls into question the fairness and reasonableness of all the DG charges at issue. Thus even if legal, none of the utilities has sufficiently justified their fees and have thus failed to meet their burden of proof.

EFCA appreciates the Commission's inquiry into these fees and the opportunity to provide these comments. EFCA reserves the right to modify or expand its comments through reply comments due on May 16, 2015 in the event that it receives additional information form the six utilities discussed above pursuant to its previously issued IRs. EFCA also appreciates the Commission's ongoing efforts to review and investigate new fees charged by cooperative utilities pursuant to 2015 statutory changes in other dockets.

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Date: March 31, 2016 at 1:50 PM
To: df@gccea.com
Cc: Ross Abbey ross@mysunshare.com, michael.allen@allenergysolar.com, canderson@allete.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grenergy.com, kmb@mcgrannshea.com, mbring@otpco.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.com, lcurrie@mncenter.org, davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, james.r.denniston@xcelenergy.com, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy.com, jfarrell@ilsr.org, emma.fazio@stoel.com, sharon.ferguson@state.mn.us, cfogale@otpco.com, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, gleckner@fresh-energy.org, bgower@apx.com, info@winonarenewableenergy.com, anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@MREA.org, lhoyum@mnpower.com, jan.hubbard@comcast.net, cjacobson@bepc.com, jjaffray@jjrpower.com, njones@hcpd.com, mkampmeyer@a-e-group.com, jmkearney@MnSEIA.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsman@wheelerlaw.com, hlevander@felhaber.com, dean@sunriseenergyventures.com, agorud.ecf@ag.state.mn.us, greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@hennepin.us, jmm@dairynet.com, Thomas.Melone@AllcoUS.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, dmoeller@allete.com, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.org, rnordstrom@gpisd.net, samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn.gov, mrathbun@grenergy.com, michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@LLSResources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnRenewables.org, mrgsimon@mrenergy.com, bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.com, paul.white@prcwind.com, jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com

---

Hello,

Sent on behalf of Jacob Schlesinger, please find EFCA's Information Request No. 1. If you have any questions, please do not hesitate to contact me.

Thank you.

Philip Jett
Paralegal
Keyes, Fox & Wiedman LLP
Distributed Generation & Renewable Energy Law
(303) 589-4559 | pjett@kfwlaw.com | www.kfwlaw.com

15-755 EFCA IR No. 1 to Goodhue County.pdf
15-755 EFCA IR No. 1 to Goodhue County.docx

KEYES, FOX & WIEDMAN LLP

March 31, 2016

Douglas Fingerson
General Manager
Goodhue County Cooperative Electric
1410 Northstar Drive, P.O. Box 99
Zumbrota, MN 55992-0099

Re: Docket No. E-999/CI-15-755: In the Matter of a Commission Inquiry Into Fees Charged on Qualifying Facilities

Dear Mr. Fingerson:

The Energy Freedom Coalition of America ("EFCA"), by and through its undersigned attorney, respectfully submits this first set of information requests to Goodhue County Cooperative Electric ("Company") in the above-captioned proceeding.

Respectfully submitted March 31, 2016.

/s/ *Jacob J. Schlesinger*

Jacob J. Schlesinger
KEYES, FOX & WIEDMAN LLP
1580 Lincoln St. Suite 880
Denver, CO 80203
Phone: 970-531-2525
Fax: 510-225-3848
E-mail: jschlesinger@kfwlaw.com

Counsel to The Energy Freedom Coalition of America

GENERAL INSTRUCTIONS

The following general instructions apply to all information requests set forth herein:

A. Consider all the Definitions and Instructions herein to be applicable to each information request submitted by the above-referenced parties.

B. These requests for documents and responses are continuing in character so as to require you to file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.

C. Unless otherwise indicated, the documents for which production is sought shall include all documents dated, prepared, sent, or received during the designated period.

D. For each separate information request, please identify the individual(s) responsible (whether primarily or indirectly) for providing the response. Further, please designate the proper witness, if any, to cross-examine at the hearing concerning the response. If witnesses have not yet been selected at the time a data response is provided, please supplement the response once witnesses have been selected to provide the requested information.

E. In producing documents and written responses pursuant to these information requests, designate and restate the request(s) and subpart(s) thereof in response to which each document or response is produced.

F. Where a document or narrative response is relevant to more than one request, a duplicate need not be provided. Where an information request can be answered in whole or in part by reference to a response to a preceding or subsequent information request (or subpart thereof), it is sufficient to indicate by specifying in the response, by number and date, which other information request response answers it, and by specifying whether it is claimed that the response to the preceding or subsequent information request is a full or partial response to the current request being answered. If the latter, the response to the balance of the current information request shall be completed.

G. Whenever these information requests specifically request an answer, rather than the identification of documents, an answer is required and the production of documents in lieu thereof will not substitute for an answer.

H. If information requested is not available in the exact form requested, provide such data or documents as are available and responsive to the particular information request.

I. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.

J. Any objection to an information request should clearly indicate to which part or portion of the information request the objection is directed.

K. For each computer-generated document identified or produced in a response, please state separately (a) what types of data files are included in the input and the source thereof; (b) the computer program; (c) a description of the recordation system employed (including program description, flow charts, etc.); and (d) the identification of the person or persons, during the designated period, who were in charge of the collection of input materials, the processing of input materials, the databases utilized, and/or the programming to obtain such output.

L. If any document described in any request for documents is no longer in your possession or control, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred voluntarily or involuntarily to others; or (d) has been otherwise disposed of.

M. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it and a statement of facts constituting the justification and basis therefore.

N. If, in answering any of these information requests, there is deemed to be any ambiguity in interpreting either the information request or a definition or instruction applicable thereto, please promptly call counsel to EFCA to obtain a clarification.

O. Each document and individual response of more than one page shall be stapled or otherwise bound, and each page thereof consecutively numbered.

P. Please provide a set of responses via e-mail where appropriate, and via hard copy where appropriate, to:

Jacob J. Schlesinger
Keyes, Fox & Wiedman LLP
1580 Lincoln St. Suite 880
Denver, CO 80203
jschlesinger@kfwlaw.com

DEFINITIONS

A. As used herein, the term "Company" means Goodhue County Cooperative Electric and any and all of its subsidiaries, parent companies, affiliates, present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.

B. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these information requests any information or documents which might otherwise be considered to be beyond their scope.

C. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these information requests any information or documents that might otherwise be considered to be beyond their scope.

D. The term "communications" includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.

E. The term "document" shall include, without limitation, all writings and records of every type in your possession, control, or custody, including but not limited to the following items, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable: computer data files, information stored in electronic media, including on computer tapes, disks, or diskettes, tapes, inputs, outputs, and printouts; notes; letters; correspondence; communications; telegrams; memoranda; summaries and records of telephonic and telegraphic communications; summaries and records of personal conversations; diaries; appointment books; reports (including any and all draft, preliminary, intermediate, and final reports); surveys; studies (including, but not limited to, load flow, engineering, general economic, and market studies); comparisons; tabulations; budgets; work papers; charts; plans; maps; drawings; engineering and other diagrams (including "one-line" diagrams); photographs; film; microfilm; microfiche; tape and other mechanical and electrical audio and video recordings; data compilations; log sheets; ledgers; vouchers; accounting statements; books; pamphlets; bulletins; minutes and records of meetings; transcripts; stenographic records; testimony and exhibits, including work papers; copies, reports, and summaries of interviews and speeches; reports and summaries of investigations; opinions and reports of consultants; reports and summaries of negotiations; press releases; newspaper clippings; drafts and revisions of draft of documents; and any and all other records, written, electrical, mechanical, and otherwise.

"Documents" shall also refer to copies of documents (even though the originals thereof are not in your possession, custody, or control), every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the originals or any other copy, and all

attachments or appendices to any documents.

F. "Identification" of a document includes stating: (a) the identity of each person who wrote, dictated, or otherwise participated in its preparation, (b) the location of the document; and (c) the identity of each person having custody of or control over the document. "Identification" of a document includes identifying all documents known or believed to exist, whether or not in your custody or the custody of counsel or other representatives.

G. "Identification" of a person includes stating his or her full name, most recent known business address and telephone number, present position, and prior connection to or association with any party to this proceeding, including position at the time of connection to the information requested.

H. "Relate to," "concern," and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, or be connected with, in any way, the subject of these data requests.

I. "Study," "studies," "analyses" or "report(s)" denotes any document, as defined above, which reflects or was utilized in the collection, evaluation, analysis, summarization, or characterization of data in connection with these requests.

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Goodhue County		
Date of Request:	March 31, 2016	Information Request No.	1

Data Requested:

Please provide an itemized account of all costs included in the Company's $3/month fee for net metering customers. Include data, calculations, electronic worksheets and any other tools or documents used to develop the $3/month meter charge. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

From: **Philip Jett** pjett@kfwlaw.com
Subject: Energy Freedom Coalition of America - IR No. 1 to Mille Lacs; MN PUC Docket No. 15-755
Date: March 31, 2016 at 1:49 PM
To: jporter@mlecmn.com
Cc: Ross Abbey ross@mysunshare.com, michael.allen@allenergysolar.com, canderson@allete.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grenergy.com, kmb@mcgrannshea.com, mbring@otpco.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.com, lcurrie@mncenter.org, davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, james.r.denniston@xcelenergy.com, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy.com, jfarrell@ilsr.org, emma.fazio@stoel.com, sharon.ferguson@state.mn.us, cfogale@otpco.com, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, gleckner@fresh-energy.org, bgower@apx.com, info@winonarenewableenergy.com, anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@MREA.org, lhoyum@mnpower.com, jan.hubbard@comcast.net, cjacobson@bepc.com, jjaffray@jjrpower.com, njones@hcpd.com, mkampmeyer@a-e-group.com, jmkearney@MnSEIA.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsman@wheelerlaw.com, hlevander@felhaber.com, dean@sunriseenergyventures.com, agorud.ecf@ag.state.mn.us, greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@hennepin.us, jmm@dairynet.com, Thomas.Melone@AllcoUS.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, dmoeller@allete.com, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.org, rnordstrom@gpisd.net, samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn.gov, mrathbun@grenergy.com, michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@LLSResources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnRenewables.org, mrgsimon@mrenergy.com, bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.com, paul.white@prcwind.com, jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com

Hello,

Sent on behalf of Jacob Schlesinger, please find EFCA's Information Request No. 1. If you have any questions, please do not hesitate to contact me.

Thank you.

Philip Jett
Paralegal
Keyes, Fox & Wiedman LLP
Distributed Generation & Renewable Energy Law
(303) 589-4559 | pjett@kfwlaw.com | www.kfwlaw.com

15-755 EFCA IR No. 1 to Mille Lacs.docx

KEYES, FOX & WIEDMAN LLP

March 31, 2016

Jay Porter
General Manager
Mille Lacs Energy Cooperative
P.O. BOX 230
Aitkin, MN 56431

Re: Docket No. E-999/CI-15-755: In the Matter of a Commission Inquiry Into Fees Charged on Qualifying Facilities

Dear Mr. Porter:

The Energy Freedom Coalition of America ("EFCA"), by and through its undersigned attorney, respectfully submits this first set of information requests to Mille Lacs Energy Cooperative ("Company") in the above-captioned proceeding.

Respectfully submitted March 31, 2016.

/s/ *Jacob J. Schlesinger*

Jacob J. Schlesinger
KEYES, FOX & WIEDMAN LLP
1580 Lincoln St. Suite 880
Denver, CO 80203
Phone: 970-531-2525
Fax: 510-225-3848
E-mail: jschlesinger@kfwlaw.com

Counsel to The Energy Freedom Coalition of America

GENERAL INSTRUCTIONS

The following general instructions apply to all information requests set forth herein:

A. Consider all the Definitions and Instructions herein to be applicable to each information request submitted by the above-referenced parties.

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E. In producing documents and written responses pursuant to these information requests, designate and restate the request(s) and subpart(s) thereof in response to which each document or response is produced.

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L. If any document described in any request for documents is no longer in your possession or control, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred voluntarily or involuntarily to others; or (d) has been otherwise disposed of.

M. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it and a statement of facts constituting the justification and basis therefore.

N. If, in answering any of these information requests, there is deemed to be any ambiguity in interpreting either the information request or a definition or instruction applicable thereto, please promptly call counsel to EFCA to obtain a clarification.

O. Each document and individual response of more than one page shall be stapled or otherwise bound, and each page thereof consecutively numbered.

P. Please provide a set of responses via e-mail where appropriate, and via hard copy where appropriate, to:

Jacob J. Schlesinger
Keyes, Fox & Wiedman LLP
1580 Lincoln St. Suite 880
Denver, CO 80203
jschlesinger@kfwlaw.com

DEFINITIONS

A. As used herein, the term "Company" means Mille Lacs Energy Cooperative and any and all of its subsidiaries, parent companies, affiliates, present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.

B. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these information requests any information or documents which might otherwise be considered to be beyond their scope.

C. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these information requests any information or documents that might otherwise be considered to be beyond their scope.

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E. The term "document" shall include, without limitation, all writings and records of every type in your possession, control, or custody, including but not limited to the following items, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable: computer data files, information stored in electronic media, including on computer tapes, disks, or diskettes, tapes, inputs, outputs, and printouts; notes; letters; correspondence; communications; telegrams; memoranda; summaries and records of telephonic and telegraphic communications; summaries and records of personal conversations; diaries; appointment books; reports (including any and all draft, preliminary, intermediate, and final reports); surveys; studies (including, but not limited to, load flow, engineering, general economic, and market studies); comparisons; tabulations; budgets; work papers; charts; plans; maps; drawings; engineering and other diagrams (including "one-line" diagrams); photographs; film; microfilm; microfiche; tape and other mechanical and electrical audio and video recordings; data compilations; log sheets; ledgers; vouchers; accounting statements; books; pamphlets; bulletins; minutes and records of meetings; transcripts; stenographic records; testimony and exhibits, including work papers; copies, reports, and summaries of interviews and speeches; reports and summaries of investigations; opinions and reports of consultants; reports and summaries of negotiations; press releases; newspaper clippings; drafts and revisions of draft of documents; and any and all other records, written, electrical, mechanical, and otherwise.

"Documents" shall also refer to copies of documents (even though the originals thereof are not in your possession, custody, or control), every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the originals or any other copy, and all

attachments or appendices to any documents.

F. "Identification" of a document includes stating: (a) the identity of each person who wrote, dictated, or otherwise participated in its preparation, (b) the location of the document; and (c) the identity of each person having custody of or control over the document. "Identification" of a document includes identifying all documents known or believed to exist, whether or not in your custody or the custody of counsel or other representatives.

G. "Identification" of a person includes stating his or her full name, most recent known business address and telephone number, present position, and prior connection to or association with any party to this proceeding, including position at the time of connection to the information requested.

H. "Relate to," "concern," and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, or be connected with, in any way, the subject of these data requests.

I. "Study," "studies," "analyses" or "report(s)" denotes any document, as defined above, which reflects or was utilized in the collection, evaluation, analysis, summarization, or characterization of data in connection with these requests.

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Mille Lacs Energy Cooperative		
Date of Request:	March 31, 2016	Information Request No.	1

Data Requested:

Please provide an itemized account of all costs included in the Company's $4.50/month fee for net metering customers. Include data, calculations, electronic worksheets and any other tools or documents used to develop the $4.50/month meter charge. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

From: **Philip Jett** pjett@kfwlaw.com
Subject: Energy Freedom Coalition of America - IR Nos. 1- 7 to Otter Tail Power; MN PUC Docket No. 15-755
Date: March 31, 2016 at 1:47 PM
To: mbring@otpco.com, cfogale@otpco.com
Cc: Ross Abbey ross@mysunshare.com, michael.allen@allenergysolar.com, canderson@allete.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grenergy.com, kmb@mcgrannshea.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.com, lcurrie@mncenter.org, davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, james.r.denniston@xcelenergy.com, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy.com, jfarrell@ilsr.org, emma.fazio@stoel.com, sharon.ferguson@state.mn.us, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, gleckner@fresh-energy.org, bgower@apx.com, info@winonarenewableenergy.com, anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@MREA.org, lhoyum@mnpower.com, jan.hubbard@comcast.net, cjacobson@bepc.com, jjaffray@jjrpower.com, njones@hcpd.com, mkampmeyer@a-e-group.com, jmkearney@MnSEIA.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsman@wheelerlaw.com, hlevander@felhaber.com, dean@sunriseenergyventures.com, agorud.ecf@ag.state.mn.us, greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@hennepin.us, jmm@dairynet.com, Thomas.Melone@AllcoUS.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, dmoeller@allete.com, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.org, rnordstrom@gpisd.net, samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn.gov, mrathbun@grenergy.com, michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@LLSResources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnRenewables.org, mrgsimon@mrenergy.com, bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.com, paul.white@prcwind.com, jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com

Hello,

Sent on behalf of Jacob Schlesinger, please find EFCA's Information Request No. 1. If you have any questions, please do not hesitate to contact me.

Thank you.

Philip Jett
Paralegal
Keyes, Fox & Wiedman LLP
Distributed Generation & Renewable Energy Law
(303) 589-4559 | pjett@kfwlaw.com | www.kfwlaw.com

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KEYES, FOX & WIEDMAN LLP

March 31, 2016

Mark B. Bring
Cathy Fogale
Otter Tail Power Company
215 S. Cascade Street
Fergus Falls, MN 56537

Re: Docket No. E-999/CI-15-755: In the Matter of a Commission Inquiry Into Fees Charged on Qualifying Facilities

Dear Mr. Bring & Ms. Fogale:

The Energy Freedom Coalition of America ("EFCA"), by and through its undersigned attorney, respectfully submits this first set of information requests to Otter Tail Power Company ("Company") in the above-captioned proceeding.

Respectfully submitted March 31, 2016.

/s/ *Jacob J. Schlesinger*

Jacob J. Schlesinger
KEYES, FOX & WIEDMAN LLP
1580 Lincoln St. Suite 880
Denver, CO 80203
Phone: 970-531-2525
Fax: 510-225-3848
E-mail: jschlesinger@kfwlaw.com

Counsel to The Energy Freedom Coalition of America

GENERAL INSTRUCTIONS

The following general instructions apply to all information requests set forth herein:

A. Consider all the Definitions and Instructions herein to be applicable to each information request submitted by the above-referenced parties.

B. These requests for documents and responses are continuing in character so as to require you to file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.

C. Unless otherwise indicated, the documents for which production is sought shall include all documents dated, prepared, sent, or received during the designated period.

D. For each separate information request, please identify the individual(s) responsible (whether primarily or indirectly) for providing the response. Further, please designate the proper witness, if any, to cross-examine at the hearing concerning the response. If witnesses have not yet been selected at the time a data response is provided, please supplement the response once witnesses have been selected to provide the requested information.

E. In producing documents and written responses pursuant to these information requests, designate and restate the request(s) and subpart(s) thereof in response to which each document or response is produced.

F. Where a document or narrative response is relevant to more than one request, a duplicate need not be provided. Where an information request can be answered in whole or in part by reference to a response to a preceding or subsequent information request (or subpart thereof), it is sufficient to indicate by specifying in the response, by number and date, which other information request response answers it, and by specifying whether it is claimed that the response to the preceding or subsequent information request is a full or partial response to the current request being answered. If the latter, the response to the balance of the current information request shall be completed.

G. Whenever these information requests specifically request an answer, rather than the identification of documents, an answer is required and the production of documents in lieu thereof will not substitute for an answer.

H. If information requested is not available in the exact form requested, provide such data or documents as are available and responsive to the particular information request.

I. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.

J. Any objection to an information request should clearly indicate to which part or portion of the information request the objection is directed.

K. For each computer-generated document identified or produced in a response, please state separately (a) what types of data files are included in the input and the source thereof; (b) the computer program; (c) a description of the recordation system employed (including program description, flow charts, etc.); and (d) the identification of the person or persons, during the designated period, who were in charge of the collection of input materials, the processing of input materials, the databases utilized, and/or the programming to obtain such output.

L. If any document described in any request for documents is no longer in your possession or control, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred voluntarily or involuntarily to others; or (d) has been otherwise disposed of.

M. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it and a statement of facts constituting the justification and basis therefore.

N. If, in answering any of these information requests, there is deemed to be any ambiguity in interpreting either the information request or a definition or instruction applicable thereto, please promptly call counsel to EFCA to obtain a clarification.

O. Each document and individual response of more than one page shall be stapled or otherwise bound, and each page thereof consecutively numbered.

P. Please provide a set of responses via e-mail where appropriate, and via hard copy where appropriate, to:

Jacob J. Schlesinger
Keyes, Fox & Wiedman LLP
1580 Lincoln St. Suite 880
Denver, CO 80203
jschlesinger@kfwlaw.com

DEFINITIONS

A. As used herein, the term "Company" means Otter Tail Power Company and any and all of its subsidiaries, parent companies, affiliates, present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.

B. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these information requests any information or documents which might otherwise be considered to be beyond their scope.

C. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these information requests any information or documents that might otherwise be considered to be beyond their scope.

D. The term "communications" includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.

E. The term "document" shall include, without limitation, all writings and records of every type in your possession, control, or custody, including but not limited to the following items, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable: computer data files, information stored in electronic media, including on computer tapes, disks, or diskettes, tapes, inputs, outputs, and printouts; notes; letters; correspondence; communications; telegrams; memoranda; summaries and records of telephonic and telegraphic communications; summaries and records of personal conversations; diaries; appointment books; reports (including any and all draft, preliminary, intermediate, and final reports); surveys; studies (including, but not limited to, load flow, engineering, general economic, and market studies); comparisons; tabulations; budgets; work papers; charts; plans; maps; drawings; engineering and other diagrams (including "one-line" diagrams); photographs; film; microfilm; microfiche; tape and other mechanical and electrical audio and video recordings; data compilations; log sheets; ledgers; vouchers; accounting statements; books; pamphlets; bulletins; minutes and records of meetings; transcripts; stenographic records; testimony and exhibits, including work papers; copies, reports, and summaries of interviews and speeches; reports and summaries of investigations; opinions and reports of consultants; reports and summaries of negotiations; press releases; newspaper clippings; drafts and revisions of draft of documents; and any and all other records, written, electrical, mechanical, and otherwise.

"Documents" shall also refer to copies of documents (even though the originals thereof are not in your possession, custody, or control), every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the originals or any other copy, and all

attachments or appendices to any documents.

F. "Identification" of a document includes stating: (a) the identity of each person who wrote, dictated, or otherwise participated in its preparation, (b) the location of the document; and (c) the identity of each person having custody of or control over the document. "Identification" of a document includes identifying all documents known or believed to exist, whether or not in your custody or the custody of counsel or other representatives.

G. "Identification" of a person includes stating his or her full name, most recent known business address and telephone number, present position, and prior connection to or association with any party to this proceeding, including position at the time of connection to the information requested.

H. "Relate to," "concern," and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, or be connected with, in any way, the subject of these data requests.

I. "Study," "studies," "analyses" or "report(s)" denotes any document, as defined above, which reflects or was utilized in the collection, evaluation, analysis, summarization, or characterization of data in connection with these requests.

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Otter Tail Power		
Date of Request:	March 31, 2016	Information Request No.	1

Data Requested:

In regards to the Company's response to information request MN-PUC-003, please explain in detail the difference in annual operations and maintenance costs for DG metering compared to annual operations and maintenance costs for the Company's standard meter. Please provide any supporting data and electronic worksheets used for the calculation. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Otter Tail Power		
Date of Request:	March 31, 2016	Information Request No.	2

Data Requested:

In regards to the Company's response to information request MN-PUC-003, please explain in detail the difference in annual per-meter administrative costs for DG metering compared to annual per-meter administrative costs for the Company's standard meter. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Otter Tail Power		
Date of Request:	March 31, 2016	Information Request No.	3

Data Requested:

Please provide the total operations and maintenance costs for the DG metering by service type, and how such costs are monitored or calculated. Please provide all data or electronic worksheets used to determine these costs. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Otter Tail Power		
Date of Request:	March 31, 2016	Information Request No.	4

Data Requested:

Please provide the total administrative costs for the DG metering by service type, and how such costs are monitored or calculated. Please provide all data or electronic worksheets used to determine these costs. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Otter Tail Power		
Date of Request:	March 31, 2016	Information Request No.	5

Data Requested:

What is the useful life of meters provided to DG customers? What is the regulatory depreciation life of meters provided to DG customers?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Otter Tail Power		
Date of Request:	March 31, 2016	Information Request No.	6

Data Requested:

Please provide the vendor and model of bi-directional service meters and production meters used for DG customers.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Otter Tail Power		
Date of Request:	March 31, 2016	Information Request No.	7

Data Requested:

How is the Company using the additional functionality of the bi-directional meters and production meters? What data is being collected and how is it being used?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

From: **Philip Jett** pjett@kfwlaw.com
Subject: Energy Freedom Coalition of America - IR Nos. 1- 8 to Connexus; MN PUC Docket No. 15-755
Date: March 31, 2016 at 1:50 PM
To: brian.burandt@connexusenergy.com, bruce.sayler@connexusenergy.com
Cc: Ross Abbey ross@mysunshare.com, michael.allen@allenergysolar.com, canderson@allete.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grenergy.com, kmb@mcgrannshea.com, mbring@otpco.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.com, lcurrie@mncenter.org, davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, james.r.denniston@xcelenergy.com, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy.com, jfarrell@ilsr.org, emma.fazio@stoel.com, sharon.ferguson@state.mn.us, cfogale@otpco.com, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, gleckner@fresh-energy.org, bgower@apx.com, info@winonarenewableenergy.com, anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@MREA.org, lhoyum@mnpower.com, jan.hubbard@comcast.net, cjacobson@bepc.com, jjaffray@jjrpower.com, njones@hcpd.com, mkampmeyer@a-e-group.com, jmkearney@MnSEIA.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsman@wheelerlaw.com, hlevander@felhaber.com, dean@sunriseenergyventures.com, agorud.ecf@ag.state.mn.us, greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@hennepin.us, jmm@dairynet.com, Thomas.Melone@AllcoUS.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, dmoeller@allete.com, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.org, rnordstrom@gpisd.net, samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn.gov, mrathbun@grenergy.com, michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@LLSResources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnRenewables.org, mrgsimon@mrenergy.com, bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.com, paul.white@prcwind.com, jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com

---

Hello,

Sent on behalf of Jacob Schlesinger, please find EFCA's Information Request Nos. 1-8. If you have any questions, please do not hesitate to contact me.

Thank you.

Philip Jett
Paralegal
Keyes, Fox & Wiedman LLP
Distributed Generation & Renewable Energy Law
(303) 589-4559 | pjett@kfwlaw.com | www.kfwlaw.com

15-755 EFCA IR Nos. 1-8 to Connexus.pdf
15-755 EFCA IR Nos. 1-8 to Connexus.docx

KEYES, FOX & WIEDMAN LLP

March 31, 2016

Brian Burandt
Vice President, Power Supply and Business Development
Connexus Energy
14602 Ramsey Blvd.
Ramsey, MN 55303

Bruce Sayler
Manager, Regulatory & Government Affairs
Connexus Energy
14601 Ramsey Blvd.
Ramsey, MN 55303

Re: Docket No. E-999/CI-15-755: In the Matter of a Commission Inquiry Into Fees Charged on Qualifying Facilities

Dear Mr. Burandt & Mr. Sayler:

The Energy Freedom Coalition of America ("EFCA"), by and through its undersigned attorney, respectfully submits this first set of information requests to Connexus Energy ("Company") in the above-captioned proceeding.

Respectfully submitted March 31, 2016.

/s/ *Jacob J. Schlesinger*

Jacob J. Schlesinger
KEYES, FOX & WIEDMAN LLP
1580 Lincoln St. Suite 880
Denver, CO 80203
Phone: 970-531-2525
Fax: 510-225-3848
E-mail: jschlesinger@kfwlaw.com

Counsel to The Energy Freedom Coalition of America

GENERAL INSTRUCTIONS

The following general instructions apply to all information requests set forth herein:

A. Consider all the Definitions and Instructions herein to be applicable to each information request submitted by the above-referenced parties.

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E. In producing documents and written responses pursuant to these information requests, designate and restate the request(s) and subpart(s) thereof in response to which each document or response is produced.

F. Where a document or narrative response is relevant to more than one request, a duplicate need not be provided. Where an information request can be answered in whole or in part by reference to a response to a preceding or subsequent information request (or subpart thereof), it is sufficient to indicate by specifying in the response, by number and date, which other information request response answers it, and by specifying whether it is claimed that the response to the preceding or subsequent information request is a full or partial response to the current request being answered. If the latter, the response to the balance of the current information request shall be completed.

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L. If any document described in any request for documents is no longer in your possession or control, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred voluntarily or involuntarily to others; or (d) has been otherwise disposed of.

M. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it and a statement of facts constituting the justification and basis therefore.

N. If, in answering any of these information requests, there is deemed to be any ambiguity in interpreting either the information request or a definition or instruction applicable thereto, please promptly call counsel to EFCA to obtain a clarification.

O. Each document and individual response of more than one page shall be stapled or otherwise bound, and each page thereof consecutively numbered.

P. Please provide a set of responses via e-mail where appropriate, and via hard copy where appropriate, to:

Jacob J. Schlesinger
Keyes, Fox & Wiedman LLP
1580 Lincoln St. Suite 880
Denver, CO 80203
jschlesinger@kfwlaw.com

DEFINITIONS

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B. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these information requests any information or documents which might otherwise be considered to be beyond their scope.

C. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these information requests any information or documents that might otherwise be considered to be beyond their scope.

D. The term "communications" includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.

E. The term "document" shall include, without limitation, all writings and records of every type in your possession, control, or custody, including but not limited to the following items, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable: computer data files, information stored in electronic media, including on computer tapes, disks, or diskettes, tapes, inputs, outputs, and printouts; notes; letters; correspondence; communications; telegrams; memoranda; summaries and records of telephonic and telegraphic communications; summaries and records of personal conversations; diaries; appointment books; reports (including any and all draft, preliminary, intermediate, and final reports); surveys; studies (including, but not limited to, load flow, engineering, general economic, and market studies); comparisons; tabulations; budgets; work papers; charts; plans; maps; drawings; engineering and other diagrams (including "one-line" diagrams); photographs; film; microfilm; microfiche; tape and other mechanical and electrical audio and video recordings; data compilations; log sheets; ledgers; vouchers; accounting statements; books; pamphlets; bulletins; minutes and records of meetings; transcripts; stenographic records; testimony and exhibits, including work papers; copies, reports, and summaries of interviews and speeches; reports and summaries of investigations; opinions and reports of consultants; reports and summaries of negotiations; press releases; newspaper clippings; drafts and revisions of draft of documents; and any and all other records, written, electrical, mechanical, and otherwise.

"Documents" shall also refer to copies of documents (even though the originals thereof are not in your possession, custody, or control), every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the originals or any other copy, and all

attachments or appendices to any documents.

F. "Identification" of a document includes stating: (a) the identity of each person who wrote, dictated, or otherwise participated in its preparation, (b) the location of the document; and (c) the identity of each person having custody of or control over the document. "Identification" of a document includes identifying all documents known or believed to exist, whether or not in your custody or the custody of counsel or other representatives.

G. "Identification" of a person includes stating his or her full name, most recent known business address and telephone number, present position, and prior connection to or association with any party to this proceeding, including position at the time of connection to the information requested.

H. "Relate to," "concern," and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, or be connected with, in any way, the subject of these data requests.

I. "Study," "studies," "analyses" or "report(s)" denotes any document, as defined above, which reflects or was utilized in the collection, evaluation, analysis, summarization, or characterization of data in connection with these requests.

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Connexus		
Date of Request:	March 31, 2016	Information Request No.	1

Data Requested:

In regards to the Company's February 5, 2016 response to Minnesota PUC data request, please explain how the Company has made the determination that the maintenance costs for a bi-directional meter are equivalent to the maintenance costs for a standard meter if the Company does not separately track operations and maintenance costs for bi-directional meters. Please include any data, calculations, electronic worksheets or other tools or documents used to make this determination. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Connexus		
Date of Request:	March 31, 2016	Information Request No.	2

Data Requested:

Please provide the Company's total meter operations & maintenance costs, and total meter count, each by customer class, for 2014 and 2015. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Connexus		
Date of Request:	March 31, 2016	Information Request No.	3

Data Requested:

In regards to the company's February 5, 2016 response to Minnesota PUC data request, please explain how the company has determined there are additional expenses related to billing customers for bi-directional meters if the company does not separately track administrative costs for bi-directional meters. Please provide all data, calculations, electronic worksheets or other tools or documents used to make this determination. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Connexus		
Date of Request:	March 31, 2016	Information Request No.	4

Data Requested:

Please explain the methodology Company uses to determine the appropriate weighting factors to allocate administrative costs. Please provide all data, calculations, electronic worksheets and any other tools or documents used to make this determination.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Connexus		
Date of Request:	March 31, 2016	Information Request No.	5

Data Requested:

Please explain why the metering fee for net energy customers is based on the incremental expense basis that is applied to Load Management rates.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Connexus		
Date of Request:	March 31, 2016	Information Request No.	6

Data Requested:

Please provide the Company's total meter operations & maintenance costs, administrative costs, and total meter count, for the Load Management rates by customer class, for 2014 and 2015. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Connexus		
Date of Request:	March 31, 2016	Information Request No.	7

Data Requested:

What is the useful life of meters provided to DG customers? What is the regulatory depreciation life of meters provided to DG customers?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Connexus		
Date of Request:	March 31, 2016	Information Request No.	8

Data Requested:

Please provide the vendor and model of bi-directional service meters and production meters used for DG customers.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

From: **Philip Jett** pjett@kfwlaw.com
Subject: Energy Freedom Coalition of America - IR Nos. 1-15 to Minnesota Power; MN PUC Docket No. 15-755
Date: March 31, 2016 at 1:48 PM
To: canderson@allete.com, lhoyum@mnpower.com, dmoeller@allete.com
Cc: Ross Abbey ross@mysunshare.com, michael.allen@allenergysolar.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grenergy.com, kmb@mcgrannshea.com, mbring@otpco.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.com, lcurrie@mncenter.org, davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, james.r.denniston@xcelenergy.com, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy.com, jfarrell@ilsr.org, emma.fazio@stoel.com, sharon.ferguson@state.mn.us, cfogale@otpco.com, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, gleckner@fresh-energy.org, bgower@apx.com, info@winonarenewableenergy.com, anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@MREA.org, jan.hubbard@comcast.net, cjacobson@bepc.com, jjaffray@jjrpower.com, njones@hcpd.com, mkampmeyer@a-e-group.com, jmkearney@MnSEIA.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsman@wheelerlaw.com, hlevander@felhaber.com, dean@sunriseenergyventures.com, agorud.ecf@ag.state.mn.us, greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@hennepin.us, jmm@dairynet.com, Thomas.Melone@AllcoUS.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.org, rnordstrom@gpisd.net, samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn.gov, mrathbun@grenergy.com, michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@LLSResources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnRenewables.org, mrgsimon@mrenergy.com, bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.com, paul.white@prcwind.com, jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com

---

Hello,

Sent on behalf of Jacob Schlesinger, please find EFCA's Information Request Nos. 1-15. If you have any questions, please do not hesitate to contact me.

Thank you.

Philip Jett
Paralegal
Keyes, Fox & Wiedman LLP
Distributed Generation & Renewable Energy Law
(303) 589-4559 | pjett@kfwlaw.com | www.kfwlaw.com

15-755 EFCA IR Nos. 1-15 to Minne…ower.docx
2015 QF_IR MINNESOT…3116.docx

KEYES, FOX & WIEDMAN LLP

March 31, 2016

Christopher Anderson
Lori Hoyum
David Moeller
Minnesota Power
30 W. Superior St.
Duluth, MN 55802-2093

Re: Docket No. E-999/CI-15-755: In the Matter of a Commission Inquiry Into Fees Charged on Qualifying Facilities

Dear Mr. Anderson, Ms. Hoyum & Mr. Moeller:

The Energy Freedom Coalition of America ("EFCA"), by and through its undersigned attorney, respectfully submits this first set of information requests to Minnesota Power ("Company") in the above-captioned proceeding.

Respectfully submitted March 31, 2016.

/s/ *Jacob J. Schlesinger*

Jacob J. Schlesinger
KEYES, FOX & WIEDMAN LLP
1580 Lincoln St. Suite 880
Denver, CO 80203
Phone: 970-531-2525
Fax: 510-225-3848
E-mail: jschlesinger@kfwlaw.com

Counsel to The Energy Freedom Coalition of America

GENERAL INSTRUCTIONS

The following general instructions apply to all information requests set forth herein:

A. Consider all the Definitions and Instructions herein to be applicable to each information request submitted by the above-referenced parties.

B. These requests for documents and responses are continuing in character so as to require you to file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.

C. Unless otherwise indicated, the documents for which production is sought shall include all documents dated, prepared, sent, or received during the designated period.

D. For each separate information request, please identify the individual(s) responsible (whether primarily or indirectly) for providing the response. Further, please designate the proper witness, if any, to cross-examine at the hearing concerning the response. If witnesses have not yet been selected at the time a data response is provided, please supplement the response once witnesses have been selected to provide the requested information.

E. In producing documents and written responses pursuant to these information requests, designate and restate the request(s) and subpart(s) thereof in response to which each document or response is produced.

F. Where a document or narrative response is relevant to more than one request, a duplicate need not be provided. Where an information request can be answered in whole or in part by reference to a response to a preceding or subsequent information request (or subpart thereof), it is sufficient to indicate by specifying in the response, by number and date, which other information request response answers it, and by specifying whether it is claimed that the response to the preceding or subsequent information request is a full or partial response to the current request being answered. If the latter, the response to the balance of the current information request shall be completed.

G. Whenever these information requests specifically request an answer, rather than the identification of documents, an answer is required and the production of documents in lieu thereof will not substitute for an answer.

H. If information requested is not available in the exact form requested, provide such data or documents as are available and responsive to the particular information request.

I. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.

J. Any objection to an information request should clearly indicate to which part or portion of the information request the objection is directed.

K. For each computer-generated document identified or produced in a response, please state separately (a) what types of data files are included in the input and the source thereof; (b) the computer program; (c) a description of the recordation system employed (including program description, flow charts, etc.); and (d) the identification of the person or persons, during the designated period, who were in charge of the collection of input materials, the processing of input materials, the databases utilized, and/or the programming to obtain such output.

L. If any document described in any request for documents is no longer in your possession or control, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred voluntarily or involuntarily to others; or (d) has been otherwise disposed of.

M. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it and a statement of facts constituting the justification and basis therefore.

N. If, in answering any of these information requests, there is deemed to be any ambiguity in interpreting either the information request or a definition or instruction applicable thereto, please promptly call counsel to EFCA to obtain a clarification.

O. Each document and individual response of more than one page shall be stapled or otherwise bound, and each page thereof consecutively numbered.

P. Please provide a set of responses via e-mail where appropriate, and via hard copy where appropriate, to:

Jacob J. Schlesinger
Keyes, Fox & Wiedman LLP
1580 Lincoln St. Suite 880
Denver, CO 80203
jschlesinger@kfwlaw.com

DEFINITIONS

A. As used herein, the term "Company" means Minnesota Power and any and all of its subsidiaries, parent companies, affiliates, present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.

B. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these information requests any information or documents which might otherwise be considered to be beyond their scope.

C. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these information requests any information or documents that might otherwise be considered to be beyond their scope.

D. The term "communications" includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.

E. The term "document" shall include, without limitation, all writings and records of every type in your possession, control, or custody, including but not limited to the following items, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable: computer data files, information stored in electronic media, including on computer tapes, disks, or diskettes, tapes, inputs, outputs, and printouts; notes; letters; correspondence; communications; telegrams; memoranda; summaries and records of telephonic and telegraphic communications; summaries and records of personal conversations; diaries; appointment books; reports (including any and all draft, preliminary, intermediate, and final reports); surveys; studies (including, but not limited to, load flow, engineering, general economic, and market studies); comparisons; tabulations; budgets; work papers; charts; plans; maps; drawings; engineering and other diagrams (including "one-line" diagrams); photographs; film; microfilm; microfiche; tape and other mechanical and electrical audio and video recordings; data compilations; log sheets; ledgers; vouchers; accounting statements; books; pamphlets; bulletins; minutes and records of meetings; transcripts; stenographic records; testimony and exhibits, including work papers; copies, reports, and summaries of interviews and speeches; reports and summaries of investigations; opinions and reports of consultants; reports and summaries of negotiations; press releases; newspaper clippings; drafts and revisions of draft of documents; and any and all other records, written, electrical, mechanical, and otherwise.

"Documents" shall also refer to copies of documents (even though the originals thereof are not in your possession, custody, or control), every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the originals or any other copy, and all

attachments or appendices to any documents.

F. "Identification" of a document includes stating: (a) the identity of each person who wrote, dictated, or otherwise participated in its preparation, (b) the location of the document; and (c) the identity of each person having custody of or control over the document. "Identification" of a document includes identifying all documents known or believed to exist, whether or not in your custody or the custody of counsel or other representatives.

G. "Identification" of a person includes stating his or her full name, most recent known business address and telephone number, present position, and prior connection to or association with any party to this proceeding, including position at the time of connection to the information requested.

H. "Relate to," "concern," and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, or be connected with, in any way, the subject of these data requests.

I. "Study," "studies," "analyses" or "report(s)" denotes any document, as defined above, which reflects or was utilized in the collection, evaluation, analysis, summarization, or characterization of data in connection with these requests.

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	1

Data Requested:

In regards to the Company's December 10, 2015 response to Minnesota PUC data request and discussion of "incorrect" cost calculations prior to 2015 (pg. 3 of comment), please provide all data, calculations, electronic worksheets or other tools or documents used to calculate monthly service charge rates for 2015, and prior to 2015. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	2

Data Requested:

In regards to page 3 of the Company's February 8, 2016 response to Minnesota PUC data request, please explain the additional distributed and general engineering costs associated with DG systems. Please provide all distribution and general engineering cost data that is specific to the Company's DG customers, for 2014 and 2015. Please provide all data, calculations, electronic worksheets or other tools or documents used to determine that 12% of the meter cost and installation and removal fee is an appropriate measure of distribution and general engineering costs for DG customers. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	3

Data Requested:

In regards to page 4 of the Company's February 8, 2016 response to Minnesota PUC data request, please provide all data, calculations, electronic worksheets or other tools or documents showing that "meters required for DG systems require additional labor compared to standard meters." Please explain how the Company tracks this data and, if the Company does not track this data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	4

Data Requested:

Does the Company charge specific residential customers a higher monthly fee if the installation or programing of their standard meter takes more time or is more costly than the average installation due to building materials, property access or other factors that may increase installation time and costs?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	5

Data Requested:

Please provide an itemized accounting of standard meter installation costs, removal costs, operations and maintenance costs, and administration costs. Please provide this data and any associated electronic worksheets by customer class for 2014 and 2015. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	6

Data Requested:

Please provide an explanation of administrative costs for a DG customer's meter and how it differs from a standard meter. Please provide all administrative cost data that is specific to the Company's DG customers, for 2014 and 2015. Please provide all data, calculations and electronic worksheets used to determine that 0.17% of the meter cost and installation and removal fee is an appropriate measure of administrative costs for DG customers. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	7

Data Requested:

Please explain why average costs associated with O&M for the life of the meter, including maintenance and administrative costs is an appropriate measure for the costs to install and remove a meter.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	8

Data Requested:

Please provide total costs for meter installation and removal, respectively, for each customer class for 2014 and 2015. Please provide total meter installs and meter removals, respectively, for each customer class for 2014 and 2015. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	9

Data Requested:

Regarding the Company's Exhibit 1 submitted on February 5, 2016, please explain the $1,408,791.29 in meter maintenance costs on page 1, line 7. Is the value an annual figure? Is the maintenance for DG meters only?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	10

Data Requested:

Regarding the Company's Exhibit 1 submitted on February 5, 2016, are the total customer account expense and customer service & info expense entries on lines 6 and 7, respectively, associated with only DG customers? Or do the entries represent all residential and general service customers?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	11

Data Requested:

Does the Company account for DG customer account expenses, DG meter reading expenses, and DG customer account revenue requirements separately from other customers?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	12

Data Requested:

Is the Company's 2010 Cost of Service study the most recent and up-to-date Cost of Service study that the company is utilizing?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	13

Data Requested:

What is the useful life of meters provided to DG customers? What is the regulatory depreciation life of meters provided to DG customers?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	14

Data Requested:

Please provide the vendor and model of bi-directional service meters and production meters used for DG customers.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Minnesota Power		
Date of Request:	March 31, 2016	Information Request No.	15

Data Requested:

How is the Company using the additional functionality of the bi-directional meters and production meters? What data is being collected and how is it being used?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

From: **Philip Jett** pjett@kfwlaw.com
Subject: Energy Freedom Coalition of America - IR Nos. 1-22 to Xcel; MN PUC Docket No. 15-755
Date: March 31, 2016 at 1:51 PM
To: james.r.denniston@xcelenergy.com, Amy.S.Fredregill@xcelenergy.com, Regulatory.records@xcelenergy.com
Cc: Ross Abbey ross@mysunshare.com, michael.allen@allenergysolar.com, canderson@allete.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grenergy.com, kmb@mcgrannshea.com, mbring@otpco.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.com, lcurrie@mncenter.org, davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy.com, jfarrell@ilsr.org, emma.fazio@stoel.com, sharon.ferguson@state.mn.us, cfogale@otpco.com, nathan@geronimoenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, gleckner@fresh-energy.org, bgower@apx.com, info@winonarenewableenergy.com, anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@MREA.org, lhoyum@mnpower.com, jan.hubbard@comcast.net, cjacobson@bepc.com, jjaffray@jjrpower.com, njones@hcpd.com, mkampmeyer@a-e-group.com, jmkearney@MnSEIA.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsman@wheelerlaw.com, hlevander@felhaber.com, dean@sunriseenergyventures.com, agorud.ecf@ag.state.mn.us, greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@hennepin.us, jmm@dairynet.com, Thomas.Melone@AllcoUS.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, dmoeller@allete.com, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.org, rnordstrom@gpisd.net, samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn.gov, mrathbun@grenergy.com, michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@LLSResources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnRenewables.org, mrgsimon@mrenergy.com, bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.com, paul.white@prcwind.com, jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com

Hello,

Sent on behalf of Jacob Schlesinger, please find EFCA's Information Request Nos. 1-22. If you have any questions, please do not hesitate to contact me.

Thank you.

Philip Jett
Paralegal
Keyes, Fox & Wiedman LLP
Distributed Generation & Renewable Energy Law
(303) 589-4559 | pjett@kfwlaw.com | www.kfwlaw.com

15-755 EFCA IR Nos. 1-22 to Xcel.pdf

2015 QF_IR XCEL_COS...3116.docx

KEYES, FOX & WIEDMAN LLP

March 31, 2016

Amy Fredergill
James Denniston
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401

Re: Docket No. E-999/CI-15-755: In the Matter of a Commission Inquiry Into Fees Charged on Qualifying Facilities

Dear Ms. Fredergill & Mr. Denniston:

The Energy Freedom Coalition of America ("EFCA"), by and through its undersigned attorney, respectfully submits this first set of information requests to Xcel Energy ("Company") in the above-captioned proceeding.

Respectfully submitted March 31, 2016.

/s/ *Jacob J. Schlesinger*

Jacob J. Schlesinger
KEYES, FOX & WIEDMAN LLP
1580 Lincoln St. Suite 880
Denver, CO 80203
Phone: 970-531-2525
Fax: 510-225-3848
E-mail: jschlesinger@kfwlaw.com

Counsel to The Energy Freedom Coalition of America

GENERAL INSTRUCTIONS

The following general instructions apply to all information requests set forth herein:

A. Consider all the Definitions and Instructions herein to be applicable to each information request submitted by the above-referenced parties.

B. These requests for documents and responses are continuing in character so as to require you to file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.

C. Unless otherwise indicated, the documents for which production is sought shall include all documents dated, prepared, sent, or received during the designated period.

D. For each separate information request, please identify the individual(s) responsible (whether primarily or indirectly) for providing the response. Further, please designate the proper witness, if any, to cross-examine at the hearing concerning the response. If witnesses have not yet been selected at the time a data response is provided, please supplement the response once witnesses have been selected to provide the requested information.

E. In producing documents and written responses pursuant to these information requests, designate and restate the request(s) and subpart(s) thereof in response to which each document or response is produced.

F. Where a document or narrative response is relevant to more than one request, a duplicate need not be provided. Where an information request can be answered in whole or in part by reference to a response to a preceding or subsequent information request (or subpart thereof), it is sufficient to indicate by specifying in the response, by number and date, which other information request response answers it, and by specifying whether it is claimed that the response to the preceding or subsequent information request is a full or partial response to the current request being answered. If the latter, the response to the balance of the current information request shall be completed.

G. Whenever these information requests specifically request an answer, rather than the identification of documents, an answer is required and the production of documents in lieu thereof will not substitute for an answer.

H. If information requested is not available in the exact form requested, provide such data or documents as are available and responsive to the particular information request.

I. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.

J. Any objection to an information request should clearly indicate to which part or portion of the information request the objection is directed.

K. For each computer-generated document identified or produced in a response, please state separately (a) what types of data files are included in the input and the source thereof; (b) the computer program; (c) a description of the recordation system employed (including program description, flow charts, etc.); and (d) the identification of the person or persons, during the designated period, who were in charge of the collection of input materials, the processing of input materials, the databases utilized, and/or the programming to obtain such output.

L. If any document described in any request for documents is no longer in your possession or control, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred voluntarily or involuntarily to others; or (d) has been otherwise disposed of.

M. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it and a statement of facts constituting the justification and basis therefore.

N. If, in answering any of these information requests, there is deemed to be any ambiguity in interpreting either the information request or a definition or instruction applicable thereto, please promptly call counsel to EFCA to obtain a clarification.

O. Each document and individual response of more than one page shall be stapled or otherwise bound, and each page thereof consecutively numbered.

P. Please provide a set of responses via e-mail where appropriate, and via hard copy where appropriate, to:

Jacob J. Schlesinger
Keyes, Fox & Wiedman LLP
1580 Lincoln St. Suite 880
Denver, CO 80203
jschlesinger@kfwlaw.com

DEFINITIONS

A. As used herein, the term "Company" means Xcel Energy and any and all of its subsidiaries, parent companies, affiliates, present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.

B. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these information requests any information or documents which might otherwise be considered to be beyond their scope.

C. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these information requests any information or documents that might otherwise be considered to be beyond their scope.

D. The term "communications" includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.

E. The term "document" shall include, without limitation, all writings and records of every type in your possession, control, or custody, including but not limited to the following items, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable: computer data files, information stored in electronic media, including on computer tapes, disks, or diskettes, tapes, inputs, outputs, and printouts; notes; letters; correspondence; communications; telegrams; memoranda; summaries and records of telephonic and telegraphic communications; summaries and records of personal conversations; diaries; appointment books; reports (including any and all draft, preliminary, intermediate, and final reports); surveys; studies (including, but not limited to, load flow, engineering, general economic, and market studies); comparisons; tabulations; budgets; work papers; charts; plans; maps; drawings; engineering and other diagrams (including "one-line" diagrams); photographs; film; microfilm; microfiche; tape and other mechanical and electrical audio and video recordings; data compilations; log sheets; ledgers; vouchers; accounting statements; books; pamphlets; bulletins; minutes and records of meetings; transcripts; stenographic records; testimony and exhibits, including work papers; copies, reports, and summaries of interviews and speeches; reports and summaries of investigations; opinions and reports of consultants; reports and summaries of negotiations; press releases; newspaper clippings; drafts and revisions of draft of documents; and any and all other records, written, electrical, mechanical, and otherwise.

"Documents" shall also refer to copies of documents (even though the originals thereof are not in your possession, custody, or control), every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the originals or any other copy, and all

attachments or appendices to any documents.

F. "Identification" of a document includes stating: (a) the identity of each person who wrote, dictated, or otherwise participated in its preparation, (b) the location of the document; and (c) the identity of each person having custody of or control over the document. "Identification" of a document includes identifying all documents known or believed to exist, whether or not in your custody or the custody of counsel or other representatives.

G. "Identification" of a person includes stating his or her full name, most recent known business address and telephone number, present position, and prior connection to or association with any party to this proceeding, including position at the time of connection to the information requested.

H. "Relate to," "concern," and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, or be connected with, in any way, the subject of these data requests.

I. "Study," "studies," "analyses" or "report(s)" denotes any document, as defined above, which reflects or was utilized in the collection, evaluation, analysis, summarization, or characterization of data in connection with these requests.

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	1

Data Requested:

In regards to the Company's February 5, 2016 response to MN PUC question 1, please provide information about the total number of DG customers being charged a fee, and how many of the customers are Solar*Rewards, and Solar*Rewards Community, Made in Minnesota, and Renewable Development Fund DG projects, respectively. Please explain how the Company tracks this data and, if the Company does not track this data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	2

Data Requested:

Do all DG customers in the Company's service territory have bi-directional service meters and production meters? If not, how many only have bi-directional service meters? Please explain how the Company tracks this data and, if the Company does not track this data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	3

Data Requested:

What is the useful life of meters provided to DG customers? What is the regulatory depreciation life of meters provided to DG customers?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	4

Data Requested:

Does the Company account for DG customer account expenses, DG meter reading expenses, and DG customer account revenue requirements separately from other customers? If so, please provide all itemized DG customer related expenses and any associated electronic worksheets for 2014 and 2015. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	5

Data Requested:

Does the Company charge a specific non-DG residential customer a higher monthly fee if their standard meter is replaced?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	6

Data Requested:

Please explain the programing costs associated with meters required by DG customers. Please provide all data, calculations and electronic worksheets used to determine the $22 of additional costs for programming a DG customer's meter. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	7

Data Requested:

Please provide all data, calculations, and electronic worksheets used to determine the $93.16 installed cost of a service meter. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	8

Data Requested:

Please provide all data, calculations, and electronic worksheets used to determine the $93.16 cost of a production meter. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	9

Data Requested:

Please provide all data, calculations, and electronic worksheets used to determine the $36.31 installation cost of bi-directional service meters. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	10

Data Requested:

Please explain in Company's exhibit "20162-118043002 Xcel.xlsx," why the Company charges an installation cost for a DG customer's meter, but does not charge an installation cost for a service billing meter.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	11

Data Requested:

Please provide all data, calculations, and electronic worksheets used to determine the Company's 13.88% Carrying Charge. Please explain how the Company tracks these costs and data and, if the Company does not track these costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	12

Data Requested:

Please explain why bi-directional meter programming and installation costs are subject to a carrying charge.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	13

Data Requested:

Please explain how service meters for non DG or cogeneration customers are read, and describe the associated costs. Please explain how the Company tracks these costs and, if the Company does not track these costs, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	14

Data Requested:

Please explain how bi-directional service meters for DG or cogeneration customers are read, and describe the associated costs. Please explain how the Company tracks these costs and, if the Company does not track these costs, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	15

Data Requested:

Please describe the costs associated with "Customer Records – FERC 903." Please explain how the Company tracks these costs and, if the Company does not track these costs, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	16

Data Requested:

Does the Company maintain two separate customer records for DG or cogeneration customers?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	17

Data Requested:

Does the Company maintain two separate Customer Assistance accounts for DG or cogeneration customers?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	18

Data Requested:

Do DG or cogeneration customers count as two customers?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	19

Data Requested:

Please explain how the current monthly cogeneration meter charge was determined for each rate code. Please provide all data, calculations, and electronic worksheets used to determine the current monthly cogeneration meter charge for:

a. A50 Rate Code – Single Phase: $3.15/month
b. A50 Rate Code – Three Phase: $6.40/month
c. A51 Rate Code – Single Phase: $5.50/month
d. A51 Rate Code – Three Phase: $8.00/month
e. A52 Rate Code – Single Phase: $5.50/month
f. A52 Rate Code – Three Phase: $8.00/month

Please explain how the Company tracks all relevant costs and data and, if the Company does not track certain costs and data, please explain why not.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	20

Data Requested:

Please provide the vendor and model of bi-directional service meters and production meters used for DG customers.

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	21

Data Requested:

Please describe the process for the DG customer meter-swap. Does this work occur during the same site visit as Xcel's inspection and witness testing? How long does the process take? How is the work scheduled?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

Energy Freedom Coalition of America
Information Request

Docket No.:	E999/CI-15-755		
Requestor:	Jacob Schlesinger		
Requested From:	Xcel		
Date of Request:	March 31, 2016	Information Request No.	22

Data Requested:

How is the Company using the additional functionality of the bi-directional meters and production meters? What data is being collected and how is it being used?

Response:

Preparer:
Title:
Department:
Telephone:
Date:

From: **Jacob Schlesinger** jschlesinger@kfwlaw.com
Subject: Fwd: Energy Freedom Coalition of America - IR No. 1 to Goodhue County; MN PUC Docket No. 15-755
Date: April 18, 2016 at 2:49 PM
To: df@gccea.com
Cc: Ross Abbey ross@mysunshare.com, michael.allen@allenergysolar.com, canderson@allete.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grenergy.com, kmb@mcgrannshea.com, mbring@otpco.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.com, lcurrie@mncenter.org, davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, james.r.denniston@xcelenergy.com, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy.com, jfarrell@ilsr.org, emma.fazio@stoel.com, sharon.ferguson@state.mn.us, cfogale@otpco.com, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, Allen Gleckner gleckner@fresh-energy.org, bgower@apx.com, info@winonarenewableenergy.com, anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@mrea.org, lhoyum@mnpower.com, jan.hubbard@comcast.net, cjacobson@bepc.com, jjaffray@jjrpower.com, njones@hcpd.com, mkampmeyer@a-e-group.com, jmkearney@mnseia.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, Bradley Klein bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsman@wheelerlaw.com, hlevander@felhaber.com, dean@sunriseenergyventures.com, agorud.ecf@ag.state.mn.us, greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, Erica S. McConnell mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@hennepin.us, jmm@dairynet.com, Thomas.Melone@allcous.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, dmoeller@allete.com, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.org, rnordstrom@gpisd.net, samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn.gov, mrathbun@grenergy.com, michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@llsresources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnrenewables.org, mrgsimon@mrenergy.com, bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.com, paul.white@prcwind.com, jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com, Twite, Andrew (PUC) Andrew.twite@state.mn.us, Philip Jett pjett@kfwlaw.com
Bcc: Sam Harvey sharvey@kfwlaw.com, Patrick Bean pbean@solarcity.com, Toba Pearlman epearlman@solarcity.com, Rebecca Stanfield rstanfield@solarcity.com

---

Greetings,

I hope this email finds you well. I am inquiring about the Energy Freedom Coalition of America's IRs served upon Goodie County on March 31, 2016 in the above captioned docket. It is my understanding that IR responses are typically due 10 business days from the date of service. By we have not yet heard from your Company regarding the need for an extension. Please advise when you expect to generate these responses. As you know, comments in this docket are due on May 6 so your prompt attention to this matter is greatly appreciated.

Thank you,

Jake Schlesinger
Keyes, Fox & Wiedman LLP
Distributed Generation & Renewable Energy Law
1580 Lincoln St., Suite 880 Denver, CO 80203
Office (NEW): (720) 639-2190 Mobile: (970) 531-2525
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Begin forwarded message:

From: Philip Jett <pjett@kfwlaw.com>
Subject: **Fwd: Energy Freedom Coalition of America - IR No. 1 to Goodhue County; MN PUC Docket No. 15-755**
Date: March 31, 2016 at 3:28:46 PM PDT
To: Sam Harvey <sharvey@kfwlaw.com>

Philip Jett
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Keyes, Fox & Wiedman LLP
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(303) 589-4559 | pjett@kfwlaw.com | www.kfwlaw.com

Begin forwarded message:

From: Philip Jett <pjett@kfwlaw.com>
Subject: **Energy Freedom Coalition of America - IR No. 1 to Goodhue County; MN PUC Docket No. 15-755**
Date: March 31, 2016 at 1:50:10 PM MDT
To: df@gccea.com
Cc: Ross Abbey <ross@mysunshare.com>, michael.allen@allenergysolar.com, canderson@allete.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grene
mbring@otpco.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.
davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, james.r.denniston@xcelenergy.com, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy
sharon.ferguson@state.mn.us, cfogale@otpco.com, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, gleckner@fresh-energy.org, bgowe
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njones@hcpd.com, mkampmeyer@a-e-group.com, jmkearney@MnSEIA.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsm
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Thomas.Melone@AllcoUS.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, dmoeller@allete.com, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.
samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn
michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@LLSResources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnRen
bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.co
jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com

> Hello,
>
> Sent on behalf of Jacob Schlesinger, please find EFCA's Information Request No. 1. If you have any questions, please do not hesitate to contact me.
>
> Thank you.

Philip Jett
Paralegal
Keyes, Fox & Wiedman LLP
Distributed Generation & Renewable Energy Law
(303) 589-4559 | pjett@kfwlaw.com | www.kfwlaw.com

15-755 EFCA IR No. 1 to Goodhue County.pdf

From: **Jacob Schlesinger** jschlesinger@kfwlaw.com
Subject: Fwd: Energy Freedom Coalition of America - IR No. 1 to Mille Lacs; MN PUC Docket No. 15-755
Date: April 18, 2016 at 2:49 PM
To: jporter@mlecmn.com
Cc: Ross Abbey ross@mysunshare.com, michael.allen@allenergysolar.com, canderson@allete.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grenergy.com, kmb@mcgrannshea.com, mbring@otpco.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.com, lcurrie@mncenter.org, davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, james.r.denniston@xcelenergy.com, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy.com, jfarrell@ilsr.org, emma.fazio@stoel.com, sharon.ferguson@state.mn.us, cfogale@otpco.com, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, Allen Gleckner gleckner@fresh-energy.org, bgower@apx.com, info@winonarenewableenergy.com, anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@mrea.org, lhoyum@mnpower.com, jan.hubbard@comcast.net, cjacobson@bepc.com, jjaffray@jjrpower.com, njones@hcpd.com, mkampmeyer@a-e-group.com, jmkearney@mnseia.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, Bradley Klein bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsman@wheelerlaw.com, hlevander@felhaber.com, dean@sunriseenergyventures.com, agorud.ecf@ag.state.mn.us, greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, Erica S. McConnell mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@hennepin.us, jmm@dairynet.com, Thomas.Melone@allcous.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, dmoeller@allete.com, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.org, rnordstrom@gpisd.net, samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn.gov, mrathbun@grenergy.com, michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@llsresources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnrenewables.org, mrgsimon@mrenergy.com, bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.com, paul.white@prcwind.com, jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com, Twite, Andrew (PUC) Andrew.twite@state.mn.us, Philip Jett pjett@kfwlaw.com
Bcc: Sam Harvey sharvey@kfwlaw.com, Patrick Bean pbean@solarcity.com, Toba Pearlman epearlman@solarcity.com, Rebecca Stanfield rstanfield@solarcity.com

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Greetings,

I hope this email finds you well. I am inquiring about the Energy Freedom Coalition of America's IRs served upon Millie Lacs on March 31, 2016 in the above captioned docket. It is my understanding that IR responses are typically due 10 business days from the date of service. By my calculation these responses were due on April 14 but we have not yet heard from your Company regarding the need for an extension. Please advise when you expect to generate these responses. As you know, comments in this docket are due on May 6 so your prompt attention to this matter is greatly appreciated.

Thank you,

Jake Schlesinger
Keyes, Fox & Wiedman LLP
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Begin forwarded message:

From: Philip Jett <pjett@kfwlaw.com>
Subject: Fwd: Energy Freedom Coalition of America - IR No. 1 to Mille Lacs; MN PUC Docket No. 15-755
Date: March 31, 2016 at 3:28:56 PM PDT
To: Sam Harvey <sharvey@kfwlaw.com>

Philip Jett
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Begin forwarded message:

From: Philip Jett <pjett@kfwlaw.com>
Subject: Energy Freedom Coalition of America - IR No. 1 to Mille Lacs; MN PUC Docket No. 15-755
Date: March 31, 2016 at 1:49:39 PM MDT
To: jporter@mlecmn.com
Cc: Ross Abbey <ross@mysunshare.com>, michael.allen@allenergysolar.com, canderson@allete.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grenergy.com, kmb@mcgrannshea.com, mbring@otpco.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.com, lcurrie@mncenter.org, davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, james.r.denniston@xcelenergy.com, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy.com, jfarrell@ilsr.org, emma.fazio@stoel.com, sharon.ferguson@state.mn.us, cfogale@otpco.com, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, gleckner@fresh-energy.org, bgower@apx.com, info@winonarenewableenergy.com, anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@MREA.org, lhoyum@mnpower.com, jan.hubbard@comcast.net, cjacobson@bepc.com, jjaffray@jjrpower.com, njones@hcpd.com, mkampmeyer@a-e-group.com, jmkearney@MnSEIA.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsman@wheelerlaw.com, hlevander@felhaber.com, dean@sunriseenergyventures.com, agorud.ecf@ag.state.mn.us, greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@hennepin.us, jmm@dairynet.com, Thomas.Melone@AllcoUS.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, dmoeller@allete.com, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.org, rnordstrom@gpisd.net, samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn.gov, mrathbun@grenergy.com, michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@LLSResources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnRenewables.org, mrgsimon@mrenergy.com, bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.com, paul.white@prcwind.com, jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com

Hello,

Sent on behalf of Jacob Schlesinger, please find EFCA's Information Request No. 1. If you have any questions, please do not hesitate to contact me.

Thank you.

Philip Jett
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From: **Jacob Schlesinger** jschlesinger@kfwlaw.com
Subject: Fwd: Energy Freedom Coalition of America - IR Nos. 1- 7 to Otter Tail Power; MN PUC Docket No. 15-755
Date: April 18, 2016 at 2:49 PM
To: mbring@otpco.com, cfogale@otpco.com
Cc: Ross Abbey ross@mysunshare.com, michael.allen@allenergysolar.com, canderson@allete.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grenergy.com, kmb@mcgrannshea.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.com, lcurrie@mncenter.org, davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, james.r.denniston@xcelenergy.com, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy.com, jfarrell@ilsr.org, emma.fazio@stoel.com, sharon.ferguson@state.mn.us, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, Allen Gleckner gleckner@fresh-energy.org, bgower@apx.com, info@winonarenewableenergy.com, anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@mrea.org, lhoyum@mnpower.com, jan.hubbard@comcast.net, cjacobson@bepc.com, jjaffray@jjrpower.com, njones@hcpd.com, mkampmeyer@a-e-group.com, jmkearney@mnseia.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, Bradley Klein bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsman@wheelerlaw.com, hlevander@felhaber.com, dean@sunriseenergyventures.com, agorud.ecf@ag.state.mn.us, greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, Erica S. McConnell mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@hennepin.us, jmm@dairynet.com, Thomas.Melone@allcous.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, dmoeller@allete.com, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.org, rnordstrom@gpisd.net, samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn.gov, mrathbun@grenergy.com, michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@llsresources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnrenewables.org, mrgsimon@mrenergy.com, bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.com, paul.white@prcwind.com, jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com, Twite, Andrew (PUC) Andrew.twite@state.mn.us, Philip Jett pjett@kfwlaw.com
Bcc: Sam Harvey sharvey@kfwlaw.com, Patrick Bean pbean@solarcity.com, Toba Pearlman epearlman@solarcity.com, Rebecca Stanfield rstanfield@solarcity.com, Kelly Crandall kcrandall@kfwlaw.com, Kevin Fox kfox@kfwlaw.com

---

Greetings,

I hope this email finds you well. I am inquiring about the Energy Freedom Coalition of America's IRs served upon Otter Tail Power on March 31, 2016 in the above captioned docket. It is my understanding that IR responses are typically due 10 business days from the date of service. B extension. Please advise when you expect to generate these responses. As you know, comments in this docket are due on May 6 so your prompt attention to this matter is greatly appreciated.

Thank you,

Jake Schlesinger
Keyes, Fox & Wiedman LLP
Distributed Generation & Renewable Energy Law
1580 Lincoln St., Suite 880 Denver, CO 80203
Office (NEW): (720) 639-2190 Mobile: (970) 531-2525
| jschlesinger@kfwlaw.com | www.kfwlaw.com |

Begin forwarded message:

From: Philip Jett <pjett@kfwlaw.com>
Subject: Fwd: Energy Freedom Coalition of America - IR Nos. 1- 7 to Otter Tail Power; MN PUC Docket No. 15-755
Date: March 31, 2016 at 3:29:41 PM PDT
To: Sam Harvey <sharvey@kfwlaw.com>

Philip Jett
Paralegal
Keyes, Fox & Wiedman LLP
Distributed Generation & Renewable Energy Law
(303) 589-4559 | pjett@kfwlaw.com | www.kfwlaw.com

Begin forwarded message:

From: Philip Jett <pjett@kfwlaw.com>
Subject: Energy Freedom Coalition of America - IR Nos. 1- 7 to Otter Tail Power; MN PUC Docket No. 15-755
Date: March 31, 2016 at 1:47:00 PM MDT
To: mbring@otpco.com, cfogale@otpco.com
Cc: Ross Abbey <ross@mysunshare.com>, michael.allen@allenergysolar.com, canderson@allete.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grene
jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.com, lcurrie@mncenter.org, davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@a
meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy.com, jfarrell@ilsr.org, emma.fazio@stoel.com, sharon.ferguson@state.mn.us, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@ava
info@winonarenewableenergy.com, anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@MREA.org, lhoyum@mnp
mkampmeyer@a-e-group.com, jmkearney@MnSEIA.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsman@wheelerlaw.com
greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@hennepin.us, jmm@dairynet.com, Thomas.Melone@AllcoUS.com, stac
mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.org, rnordstrom@gpisd.net, samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcpl
gayle.prest@minneapolismn.gov, mrathbun@grenergy.com, michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@LLSResources.com, kjs@dairynet.com, cp.sc
bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.co
cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com

Hello,

Sent on behalf of Jacob Schlesinger, please find EFCA's Information Request No. 1. If you have any questions, please do not hesitate to contact me.

Thank you.

Philip Jett
Paralegal
Keyes, Fox & Wiedman LLP

Keyes, Fox & Wiedman LLP
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15-755 EFCA IR Nos. 1-7 to Otter T... Power.pdf

15-755 EFCA IR Nos. 1-7 to Otter T...Power.docx

From: **Jacob Schlesinger** jschlesinger@kfwlaw.com
Subject: Fwd: Energy Freedom Coalition of America - IR Nos. 1- 8 to Connexus; MN PUC Docket No. 15-755
Date: April 18, 2016 at 2:49 PM
To: brian.burandt@connexusenergy.com, bruce.sayler@connexusenergy.com
Cc: Ross Abbey ross@mysunshare.com, michael.allen@allenergysolar.com, canderson@allete.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grenergy.com, kmb@mcgrannshea.com, mbring@otpco.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.com, lcurrie@mncenter.org, davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, james.r.denniston@xcelenergy.com, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy.com, jfarrell@ilsr.org, emma.fazio@stoel.com, sharon.ferguson@state.mn.us, cfogale@otpco.com, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, Allen Gleckner gleckner@fresh-energy.org, bgower@apx.com, info@winonarenewableenergy.com, anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@mrea.org, lhoyum@mnpower.com, jan.hubbard@comcast.net, cjacobson@bepc.com, jjaffray@jjrpower.com, njones@hcpd.com, mkampmeyer@a-e-group.com, jmkearney@mnseia.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, Bradley Klein bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsman@wheelerlaw.com, hlevander@felhaber.com, dean@sunriseenergyventures.com, agorud.ecf@ag.state.mn.us, greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, Erica S. McConnell mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@hennepin.us, jmm@dairynet.com, Thomas.Melone@allcous.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, dmoeller@allete.com, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.org, rnordstrom@gpisd.net, samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn.gov, mrathbun@grenergy.com, michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@llsresources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnrenewables.org, mrgsimon@mrenergy.com, bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.com, paul.white@prcwind.com, jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com, Twite, Andrew (PUC) Andrew.twite@state.mn.us, Philip Jett pjett@kfwlaw.com
Bcc: Sam Harvey sharvey@kfwlaw.com, Patrick Bean pbean@solarcity.com, Toba Pearlman epearlman@solarcity.com, Rebecca Stanfield rstanfield@solarcity.com

---

Greetings,

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have not yet heard from your Company regarding the need for an extension. Please advise when you expect to generate these responses. As you know, comments in this docket are due on May 6 so your prompt attention to this matter is greatly appreciated.

Thank you,

Jake Schlesinger
Keyes, Fox & Wiedman LLP
Distributed Generation & Renewable Energy Law
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Office (NEW): (720) 639-2190 Mobile: (970) 531-2525
| jschlesinger@kfwlaw.com | www.kfwlaw.com |

Begin forwarded message:

From: Philip Jett <pjett@kfwlaw.com>
Subject: **Fwd: Energy Freedom Coalition of America - IR Nos. 1- 8 to Connexus; MN PUC Docket No. 15-755**
Date: March 31, 2016 at 3:28:39 PM PDT
To: Sam Harvey <sharvey@kfwlaw.com>

Philip Jett
Paralegal
Keyes, Fox & Wiedman LLP
Distributed Generation & Renewable Energy Law
(303) 589-4559 | pjett@kfwlaw.com | www.kfwlaw.com

Begin forwarded message:

From: Philip Jett <pjett@kfwlaw.com>
Subject: **Energy Freedom Coalition of America - IR Nos. 1- 8 to Connexus; MN PUC Docket No. 15-755**
Date: March 31, 2016 at 1:50:57 PM MDT
To: brian.burandt@connexusenergy.com, bruce.sayler@connexusenergy.com
Cc: Ross Abbey <ross@mysunshare.com>, michael.allen@allenergysolar.com, canderson@allete.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grene
mbring@otpco.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.
davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, james.r.denniston@xcelenergy.com, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy
sharon.ferguson@state.mn.us, cfogale@otpco.com, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, gleckner@fresh-energy.org, bgowe
anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@MREA.org, lhoyum@mnpower.com, jan.hubbard@comcast.ne
njones@hcpd.com, mkampmeyer@a-e-group.com, jmkearney@MnSEIA.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsm
dean@sunriseenergyventures.com, agorud.ecf@ag.state.mn.us, greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@henn
Thomas.Melone@AllcoUS.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, dmoeller@allete.com, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.
samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn
michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@LLSResources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnRen
bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.co
jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com

> Hello,
>
> Sent on behalf of Jacob Schlesinger, please find EFCA's Information Request Nos. 1-8. If you have any questions, please do not hesitate to contact me.
>
> Thank you.

Philip Jett
Paralegal
Keyes, Fox & Wiedman LLP
Distributed Generation & Renewable Energy Law
(303) 589-4559 | pjett@kfwlaw.com | www.kfwlaw.com

15-755 EFCA IR Nos. 1-8 to Connexus.pdf

15-755 EFCA IR Nos. 1-8 to Connexus.docx

From: **Jacob Schlesinger** jschlesinger@kfwlaw.com
Subject: Fwd: Energy Freedom Coalition of America - IR Nos. 1-15 to Minnesota Power; MN PUC Docket No. 15-755
Date: April 18, 2016 at 2:49 PM
To: canderson@allete.com, lhoyum@mnpower.com, dmoeller@allete.com
Cc: Ross Abbey ross@mysunshare.com, michael.allen@allenergysolar.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grenergy.com, kmb@mcgrannshea.com, mbring@otpco.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.com, lcurrie@mncenter.org, davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, james.r.denniston@xcelenergy.com, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy.com, jfarrell@ilsr.org, emma.fazio@stoel.com, sharon.ferguson@state.mn.us, cfogale@otpco.com, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, Allen Gleckner gleckner@fresh-energy.org, bgower@apx.com, info@winonarenewableenergy.com, anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@mrea.org, jan.hubbard@comcast.net, cjacobson@bepc.com, jjaffray@jjrpower.com, njones@hcpd.com , mkampmeyer@a-e-group.com, jmkearney@mnseia.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, Bradley Klein bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsman@wheelerlaw.com, hlevander@felhaber.com, dean@sunriseenergyventures.com, agorud.ecf@ag.state.mn.us, greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, Erica S. McConnell mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@hennepin.us, jmm@dairynet.com, Thomas.Melone@allcous.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.org, rnordstrom@gpisd.net, samanthanorris@alliantenergy.com, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn.gov, mrathbun@grenergy.com, michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@llsresources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnrenewables.org, mrgsimon@mrenergy.com, bsoholt@windonthewires.org, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.com, paul.white@prcwind.com, jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com, Twite, Andrew (PUC) Andrew.twite@state.mn.us, Philip Jett pjett@kfwlaw.com
Bcc: Sam Harvey sharvey@kfwlaw.com, Patrick Bean pbean@solarcity.com, Toba Pearlman epearlman@solarcity.com, Rebecca Stanfield rstanfield@solarcity.com

---

Greetings,

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1580 Lincoln St., Suite 880 Denver, CO 80203
Office (NEW): (720) 639-2190 Mobile: (970) 531-2525
| jschlesinger@kfwlaw.com | www.kfwlaw.com |

Begin forwarded message:

From: Philip Jett <pjett@kfwlaw.com>
Subject: Fwd: Energy Freedom Coalition of America - IR Nos. 1-15 to Minnesota Power; MN PUC Docket No. 15-755
Date: March 31, 2016 at 3:29:18 PM PDT
To: Sam Harvey <sharvey@kfwlaw.com>

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Begin forwarded message:

From: Philip Jett <pjett@kfwlaw.com>
Subject: Energy Freedom Coalition of America - IR Nos. 1-15 to Minnesota Power; MN PUC Docket No. 15-755
Date: March 31, 2016 at 1:48:55 PM MDT
To: canderson@allete.com, lhoyum@mnpower.com, dmoeller@allete.com
Cc: Ross Abbey <ross@mysunshare.com>, michael.allen@allenergysolar.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grenergy.com, kmb@mcgrannshea.com, cbrusven@fredlaw.com, mbull@mncee.org, jessica.burdette@state.mn.us, jcannon@tenksolar.com, dmc@mcgrannshea.com, jcarroll@newportpartners.com, kcolburn@symbioticstrategies.com, gwillc@nawo.org, Crowell.arthur@yahoo.com, lcurrie@mncenter.org, davedahlberg@nweco.com, james.darabi@solarfarm.com, dustin@appliedenergyinnovations.org, james.r.denniston@xcelenergy.com, curt.dieren@dgr.com, ian.dobson@ag.state.mn.us, meggl@bepc.com, betsy@geronimoenergy.com, oncu.er@avantenergy.com, jfarrell@ilsr.org, emma.fazio@stoel.com, cfogale@otpco.com, nathan@geronimoenergy.com, Amy.S.Fredregill@xcelenergy.com, halgalvin@comcast.net, Gary.Garbe@avantenergy.com, egarry@peoplesrec.com, garveyed@aol.com, gleckner@fresh-energy.org, bgower@apx.com, info@winonarenewableenergy.com, anthony.hainault@co.hennepin.mn.us, duane.hebert@novelenergy.biz, helmers.john@co.olmsted.mn.us, hendricksj@owatonnautilities.com, mui@mnutilityinvestors.org, lhinkle@mnseia.org, Jim@MREA.org, jan.hubbard@comcast.net, cjacobson@bepc.com, mkampmeyer@a-e-group.com, jmkearney@MnSEIA.org, kevin.keene@cummins.com, jkegel@mmua.org, mklein@socoreenergy.com, bklein@elpc.org, jwkluempke@winlectric.com, jk2surf@aol.com, michaelkrause61@yahoo.com, jlandsman@wheelerlaw.com, dean@sunriseenergyventures.com, agorud.ecf@ag.state.mn.us, greenenergyproductsllc@gmail.com, rebecca.lundberg@powerfullygreen.com, casey@appliedenergyinnovations.org, mcconnell@smwlaw.com, smcgrane@felhaber.com, David.McNary@hennepin.us, Thomas.Melone@AllcoUS.com, stacy.miller@state.mn.us, momentums@aol.com, darrick@mrea.org, apmoratzka@stoel.com, mmorud@trunorthsolar.com, david.niles@avantenergy.com, nissen@fresh-energy.org, noble@fresh-energy.org, rnordstrom@gpisd.net, jeff.oneill@ci.monticello.mn.us, rolson@hcpd.com, dpatry@sunedison.com, jeff.jcplaw@comcast.net, john.pendray@cummins.com, mperanteau@wheelerlaw.com, dpickard@aladdinsolar.com, gayle.prest@minneapolismn.gov, mrathbun@grenergy.com, michael.reinertson@avantenergy.com, kreuther@mncenter.org, crustad@minnkota.com, bsahr@eastriver.coop, rsavelkoul@martinsquires.com, Larry@LLSResources.com, kjs@dairynet.com, cp.schoenherr@smmpa.org, shaff081@gmail.com, dougs@mnRenewables.org, mrgsimon@mrenergy.com, eswanson@winthrop.com, tom.sweeney@easycleanenergy.com, Regulatory.records@xcelenergy.com, stevet@cmmpa.org, pat.jcplaw@comcast.net, dalene@mncable.net, sdvillella@gmail.com, warehimer@owatonnautilities.com, paul.white@prcwind.com, jason.willett@metc.state.mn.us, DanWilliams.mg@gmail.com, rwinter@felhaber.com, cwinton@mnchamber.com, robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com

> Hello,
>
> Sent on behalf of Jacob Schlesinger, please find EFCA's Information Request Nos. 1-15. If you have any questions, please do not hesitate to contact me.
>
> Thank you.

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15-755 EFCA IR Nos. 1-15 to Minne...Power.pdf

15-755 EFCA IR Nos. 1-15 to Minne...ower.docx

2015 QF_IR MINNESOT...3116.docx

From: **Jacob Schlesinger** jschlesinger@kfwlaw.com
Subject: Fwd: Energy Freedom Coalition of America - IR Nos. 1-22 to Xcel; MN PUC Docket No. 15-755
Date: April 18, 2016 at 2:49 PM
To: james.r.denniston@xcelenergy.com, Amy.S.Fredregill@xcelenergy.com, Regulatory.records@xcelenergy.com
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Bcc: Sam Harvey sharvey@kfwlaw.com, Patrick Bean pbean@solarcity.com, Toba Pearlman epearlman@solarcity.com, Rebecca Stanfield rstanfield@solarcity.com, Kevin Fox kfox@kfwlaw.com, Kelly Crandall kcrandall@kfwlaw.com

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Greetings,

I hope this email finds you well. I am inquiring about the Energy Freedom Coalition of America's IRs served upon Xcel on March 31, 2016 in the above captioned docket. It is my understanding that IR responses are typically due 10 business days from the date of service. By my calcula
Please advise when you expect to generate these responses. As you know, comments in this docket are due on May 6 so your prompt attention to this matter is greatly appreciated.

Thank you,

Jake Schlesinger

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Begin forwarded message:

From: Philip Jett <pjett@kfwlaw.com>
Subject: **Fwd: Energy Freedom Coalition of America - IR Nos. 1-22 to Xcel; MN PUC Docket No. 15-755**
Date: March 31, 2016 at 3:29:30 PM PDT
To: Sam Harvey <sharvey@kfwlaw.com>

Philip Jett
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Begin forwarded message:

From: Philip Jett <pjett@kfwlaw.com>
Subject: **Energy Freedom Coalition of America - IR Nos. 1-22 to Xcel; MN PUC Docket No. 15-755**
Date: March 31, 2016 at 1:51:44 PM MDT
To: james.r.denniston@xcelenergy.com, Amy.S.Fredregill@xcelenergy.com, Regulatory.records@xcelenergy.com
Cc: Ross Abbey <ross@mysunshare.com>, michael.allen@allenergysolar.com, canderson@allete.com, Julia.Anderson@ag.state.mn.us, sarab@irecusa.org, derek.bertsch@mrenergy.com, bblazar@mnchamber.com, kbradley1965@gmail.com, jbrekke@grene
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robynwoeste@alliantenergy.com, dan.wolf@state.mn.us, TZaremba@wheelerlaw.com

> Hello,
>
> Sent on behalf of Jacob Schlesinger, please find EFCA's Information Request Nos. 1-22. If you have any questions, please do not hesitate to contact me.
>
> Thank you.

Philip Jett
Paralegal

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From: **Edman, Timothy J** Timothy.J.Edman@xcelenergy.com
Subject: Xcel Energy Response to EFCA Discovery Request - MPUC Docket No. E999/CI-15-755
Date: April 21, 2016 at 9:27 AM
To: jschlesinger@kfwlaw.com
Cc: pjett@kfwlaw.com

ET

Dear Mr. Schlesinger:

Attached please find our letter regarding the discovery request of the Energy Freedom Coalition of America in the above-referenced docket.

Please contact me if you have any questions regarding our response.

Thank you.

Tim

Timothy J. Edman
Xcel Energy | Regulatory Administration
414 Nicollet Mall, 7 Minneapolis, MN 55401
P: 612.330.2952 **C:** 612.207.2080 **F:** 612.215.7601
E: Timothy.J.Edman@xcelenergy.com

414 Nicollet Mall
Minneapolis, Minnesota 55401-1993

April 21, 2016

Jake Schlesinger
Keyes, Fox & Wiedman LLP
Distributed Generation & Renewable Energy Law
1580 Lincoln St., Suite 880
Denver, CO 80203

RE: Docket No. E999/ CI-15-755
Commission Inquiry into Fees Charged on Qualifying Facilities

Dear Mr. Schlesinger:

We appreciate your interest in this docket, and we welcome input regarding the information that has been provided to the Minnesota Public Utilities Commission as part of their inquiry, which is available on e-dockets.

In terms of regulatory procedure for this and other dockets, "participants" have the opportunity to submit comments and appear at Commission hearings, while stakeholders recognized as a "party" may submit discovery requests. It is our understanding that you have not yet been recognized as a party in this docket. Additionally, in this particular docket the Commission Notice issued on December 23, 2015 setting forth the comment schedule stated that "The Commission also authorized staff to request additional information as staff deems appropriate." At this time, there is no provision in this Notice for other participants to issue information requests.

We note that some of the information you are requesting can already be found in what we have e-filed in this docket. We also wish to note, however, that some of the information you have requested does not seem relevant to the inquiry and we reserve the right to object if you do obtain status and authorization to issue information requests. Finally, we note that some of the requested information is likely trade secret data and there would need to be either a non-disclosure agreement or protective order issued that would govern the release of such data.

Again, thank you for your interest in this docket. Please contact Tim Edman at timothy.j.edman@xcelenergy.com or 612-330-2952 if you have any questions.

Sincerely,

/S/

Amy S. Fredregill
Manager, Resource Planning and Strategy

CERTIFICATE OF SERVICE

I, Philip Jett, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail.

INITIAL COMMENTS OF THE ENERGY FREEDOM COALITION OF AMERICA

In the Matter of a Commission Inquiry into Fees Charged on Qualifying Facilities
MPUC Docket No. E999/CI-15-755

Dated this 6th day of May, 2016.

/s/ Philip Jett

Philip Jett
Paralegal
Keyes, Fox & Wiedman, LLP
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Print Close

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Nordstrom	Rolf	rnordstrom@gpisd.net	Great Plains Institute	Electronic Service	No
Norris	Samantha	samanthanorris@alliantenergy.com	Interstate Power and Light Company	Electronic Service	No
O'Neill	Jeff	jeff.oneill@ci.monticello.mn.us	City of Monticello	Electronic Service	No
Olson	Russell	rolson@hcpd.com	Heartland Consumers Power District	Electronic Service	No
Patry	Dan	dpatry@sunedison.com	SunEdison	Electronic Service	No
Paulson	Jeffrey C	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	Electronic Service	No
Pendray	John	john.pendray@cummins.com	N/A	Electronic Service	No
Peranteau	Mary Beth	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	Electronic Service	No

Pickard	Donna	dpickardgsss@gmail.com	Citizen	Electronic Service	No
Prazak	David G.	dprazak@otpco.com	Otter Tail Power Company	Electronic Service	No
Prest	Gayle	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	Electronic Service	No
Rathbun	Mark	mrathbun@grenergy.com	Great River Energy	Electronic Service	No
Reinertson	Michael	michael.reinertson@avantenergy.com	Avant Energy	Electronic Service	No
Reuther	Kevin	kreuther@mncenter.org	MN Center for Environmental Advocacy	Electronic Service	No
Rustad	Craig	crustad@minnkota.com	Minnkota Power	Electronic Service	No
Sahr	Robert K.	bsahr@eastriver.coop	East River Electric Power Cooperative	Electronic Service	No
Savelkoul	Richard	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	Electronic Service	No

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Paper Service Member(s)

Last Name	First Name	Company Name	Address	Delivery Method	View Trade Secret
Eide Tollefson	Kristen	R-CURE	28477 N Lake Ave, Frontenac, MN-55026-1044	Paper Service	No
Houston	Ashley	N/A	120 Fairway Rd, Chestnut Hill, MA-24671850	Paper Service	No
Ketchum	Julie	Waste Management	20520 Keokuk Ave, Lakeville, MN-55044	Paper Service	No
Levchak	Deborah Fohr	Basin Electric Power Cooperative	1717 East Interstate Avenue, Bismarck, ND-585030564	Paper Service	No
Miller	Alan	N/A	2210 20th St NE, Stewartville, MN-55976	Paper Service	No
Nelson	Ben	CMMPA	459 South Grove Street, Blue Earth, MN-56013	Paper Service	No
Reinhardt	John C.	Laura A. Reinhardt	3552 26Th Avenue South, Minneapolis, MN-55406	Paper Service	No
Sedgwick	Dean	Itasca Power Company	PO Box 457, Bigfork, MN-56628-0457	Paper Service	No

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