

January 15, 2020

Ryan Barlow
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/M-19-684

Dear Mr. Barlow:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Minnesota Power's 2019 Integrated Distribution Plan

As discussed in the attached comments, the Department provides its response to the Minnesota Public Utilities Commission's (Commission) November 15, 2019 *Notice of Comment Period on Minnesota Power's 2019 Integrated Distribution Plan*.

The Department recommends that the Commission accept Minnesota Power's IDP Report, and offers certain amendments to the Commission's *Minnesota Integrated Distribution Planning Requirements for Minnesota Power*. The Department is available to respond to any questions the Commission may have on this matter.

Sincerely,

/s/ MATTHEW LANDI
Rates Analyst

ML/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. E015/M-19-684

I. BACKGROUND

Over the past several years, the Minnesota Public Utilities Commission (Commission) has investigated utility distribution system planning and the modernization of the electric grid as it pertains to investor-owned utilities generally in Docket No. E999/CI-15-556 (Grid Modernization docket). The Grid Modernization docket was discussed at the Commission's April 19, 2018 agenda meeting, in which the Commission reviewed the draft Integrated Distribution Plan (IDP) filing requirements developed through a Commission-led stakeholder process and heard party comments. The proposed requirements direct utilities to file plans addressing: long-term distribution system modifications and investments, considerations used in related planning processes, and long-term distribution system future outlooks, among other requirements.

On February 20, 2019, the Commission issued its *Order Adopting Integrated Distribution Plan Filing Requirements* in Docket No. E017/CI-18-253, E015/M-18-254, and E111/CI-18-255 (the Order) establishing IDP filing requirements and deadlines for Otter Tail Power Company, Minnesota Power (MP, or the Company), and Dakota Electric Association, respectively. The Order directed the utilities to file their first IDPs by November 1, 2019.

MP subsequently filed its first IDP as required in this proceeding. On November 15, 2019, the Commission issued a *Notice of Comment Period* (Notice). The notice reaffirmed the purpose of the Commission's Integrated Distribution Plan (IDP) filing requirements:

- Maintain and enhance the safety, security, reliability, and resilience of the electric grid, at fair and reasonable costs, consistent with the state's energy policies;
- Enable greater customer engagement, empowerment, and options for energy services;
- Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies;
- Ensure optimized utilization of electricity grid assets and resources to minimize total system costs; and
- Provide the Commission with the information necessary to understand the utility's short-term and long-term distribution-system plans, the costs and benefits of the specific investments, and a comprehensive analysis of ratepayer cost and value.

The Commission's Notice also included the following topics open for comment:

1. Should the Commission accept or reject Minnesota Power's Integrated Distribution Plan (IDP)?
2. Does the IDP filed by Minnesota Power achieve the planning objectives in the filing requirements approved in the Commission's February 20, 2019 Order?
3. What IDP filing requirements provided the most value to the process and why?
4. Are there filing requirements that are not informative and/or should be deleted or modified, and why?
5. Are there other issues or concerns related to this matter?

II. DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) views the Company's initial foray into producing the IDP Report in compliance with the Commission's Order as foundational: the first IDP Report should be generally viewed as the nascent attempt at an iterative process that will yield greater insight and transparency into the Company's distribution system planning and operations processes.

In this view, the Department believes that the IDP Report is first and foremost an instructive guide to the Company's internal distribution system planning and operations processes. Utility distribution systems have historically functioned without substantial oversight of regulators. Consequently, an informational asymmetry between the utility and regulators has developed, with regulators having minimal understanding of utilities' distribution system planning and operations processes.

Therefore, the Department views MP's first IDP Report as the beginning of a dialogue between the utility, regulators, and stakeholders interested in the orderly, cost-efficient, and synergistic evolution of the distribution system. As emergent technologies lead to new possibilities and paradigms for electric utility customers and the electric utility business model, regulators and other stakeholders need to have a basic understanding of how electric utilities plan and operate their distribution systems.

Therefore, the Department's analysis here is limited to ensuring that the substantive requirements of the IDP Report have been fulfilled, and offering suggestions for potential improvements to future IDP reports and potential modifications to the IDP filing requirements.

The Department's analysis that follows is framed in response to the Commission's Notice.

A. *THE COMMISSION SHOULD ACCEPT MINNESOTA POWER'S IDP*

The Department views MP's first IDP Report as detailed, thorough, and instructive. The Department appreciates the Company's considerable efforts in compiling this report and complying with the IDP Requirements set forth in the Commission's February 20, 2019 Order.

The Department recommends that the Commission accept MP's IDP. (Recommendation 1)

B. MINNESOTA POWER'S IDP ACHIEVES THE PLANNING OBJECTIVES OF THE COMMISSION'S ORDER

The Planning Objectives outlined in the filing requirements approved by the Commission's February 20, 2019 Order are as follows:¹

Planning Objectives: The Commission is facilitating comprehensive, coordinated, transparent, integrated distribution plans to:

- Maintain and enhance the safety, security, reliability, and resilience of the electricity grid, at fair and reasonable costs, consistent with the state's energy policies;
- Enable greater customer engagement, empowerment, and options for energy services;
- Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies;
- Ensure optimized utilization of electricity grid assets and resources to minimize total system costs; and
- Provide the Commission with the information necessary to understand the utility's short-term and long-term distribution system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value.

As noted above, the Department views MP's initial IDP Report as foundational: it should be seen as an informational guide to the utility's internal distribution system planning and operations processes. As such, the IDP Report provides a baseline level of detail and discussion that can be used in the qualitative evaluation of future IDP reports.

In addition to this view, and given that that the IDP process is designed to be iterative and will necessarily evolve over time, the question of whether the planning objectives were achieved by the IDP Report is somewhat premature. Establishing the IDP Report as a baseline understanding of MP's internal distribution system planning and operations processes will enable stakeholders to build off of the knowledge gained, and, with each successive report, a better qualitative assessment of whether the planning objectives are achieved can be conducted.

¹ [Order Adopting Integrated Distribution-Plan Filing Requirements](#), dated February 20, 2019, filed in Docket Nos. E017/CI-18-253, E015/CI-18-254, and E111/CI-18-255.

Accordingly, the Department’s review of the IDP Report focuses mainly on whether the Company provided information relevant to the planning objectives listed above such that future analyses can more qualitatively determine whether the outcomes that the planning objectives articulate can materialize over time with the information contained in the IDP report.

In determining whether the planning objectives were furthered by the IDP Report, the Department analyzed whether the Company went into a level of detail that yields a greater understanding of how the Company includes the objectives in: (1) its planning and/or operations processes; and/or (2) its future, planned initiatives and/or investments. While primarily a quantitative analysis, the Department’s assessment nevertheless attempts to qualitatively assess whether the substance of the IDP Report furthers the planning objectives.

1. *Planning Objective #1- Maintain and enhance the safety, security, reliability, and resilience of the electricity grid, at fair and reasonable costs, consistent with the state’s energy policies*

The Department analyzed MP’s IDP Report to see whether the information presented was related to and sufficient in detail to assess the IDP Report’s ability to actualize the first planning objective. Overall the Department notes that the Company’s IDP Report discussed each of the topics listed in the first planning objective: safety, security, reliability, resilience, fair and reasonable costs, and consistency with state energy policies. The Department provides a high-level analysis of the location of these topics in the IDP Report in Table 1 below.

Table 1. Location of Topics of the First Planning Objective in Xcel’s IDP Report

TOPIC	PAGE #
Safety	Section II.B, at 19. Section II.F, at 28.
Security	Section II.F, at 28.
Reliability	Section I, at 5-6. Section I.D.2, at 13. Section II, at 14. Section II.B, at 19-22. Section II.E, at 25-27. Section III.C, at 34-36. Section IV.A., at 36.
Resilience	Section I.B, at 9.
Fair and Reasonable Costs	Section I, at 5-7. Section II, at 14. Section II.C, at 20-24. Section II.E., at 25-27. Section III.A, at 29, 31-32.
Consistent with State Energy Policies	Section II.A, at 15-16. Section IV.B.1, at 37. Section IV.C, at 40-41. Section IV.E, at 44. Section IV.F, at 45. Section IV.G, at 46-47.

As suggested by the high-level analysis of the content of MP’s IDP Report, the Department concludes that the Company addressed each of the topics in the first planning objective in some substantive way.

2. Planning Objective #2 - Enable greater customer engagement, empowerment, and options for energy services

The Department analyzed MP's IDP Report to see whether the information presented was related to and sufficient in detail to assess the IDP Report's ability to actualize the second planning objective. Overall, the Department notes that the Company's IDP Report provided information and discussion related to the second planning objective. The Department highlights some of the elements of the IDP Report that are related to the second planning objective.

On page 7 of the IDP Report, MP discussed its efforts to develop and enhance its customers' experience of its digital platform in response to surveys it conducted with Rapp Strategies. The Company found that customers desire to engage in digital platforms, and as a result, implemented online credit card payments, provided additional MyAccount tools for customers to start, stop, and transfer service, created a mobile-app-based function for outage notification and MyAccount access, and created a "Voice of the Customer" online discussion board to gain direct customer feedback.²

On pages 10 through 13, MP provided an overview of its distribution system and detailed the existing and planned programs, processes, and technologies that are geared toward providing customers with additional services and platforms and provide MP with additional information about its system to better plan for and provide new technologies that enable greater customer interaction.

MP also discussed potential pilot programs it may offer in forthcoming proposals on pages 37 through 39 of the IDP Report. Some of these potential pilot programs create new types of services for customers, such as Demand Response programs, and use of its meter data management (MDM) system to inform program design and rate structures for specific electric end uses and allow for sub-metering applications.

The IDP Report provides detailed references to how MP's distribution system planning processes are in part designed to enable greater customer engagement, empowerment, and options for energy services. The Department notes that this list is not exhaustive of the items discussed in the IDP Report that relate to the second planning objective. The Department concludes that the Company provided extensive information and discussion of items related to the second planning objective.

3. Planning Objective #3 - Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies

The Department analyzed MP's IDP Report to see whether the information presented was related to and in sufficient detail to assess the IDP Report's ability to actualize the third planning objective. Overall, the Department notes that the Company's IDP Report provided information and discussion related to the third planning objective.

² IDP Report, at 8.

On pages 10 through 13 of the IDP Report, and later in the IDP Report on pages 22 through 24, the Company provided information related to its Customer to Meter (C2M) project, an advanced meter billing system that provides additional capabilities and platforms for customer interaction. MP indicated that the C2M project will enable customers to enjoy the following benefits:³

- Capability to automate billing for Time of Day and other time-varying rates.
- Energy use data in MyAccount will appear more clearly.
- Billing estimates will be more accurate.
- Remote service connections and disconnections will be simplified.
- New programs and rates for innovative technology such as electric vehicles will be more easily designed

The Company also explained that the C2M platform will “provided the foundation to respond more quickly to changing regulatory and marketing demand” and “will improve the Company’s understanding of its customers via data analytics, rate guidance and targeted program offerings to customers, as well as the efficiency and accuracy of the meter asset management process.”⁴

The Department notes that this list is not exhaustive of the items discussed in the IDP Report that relate to the third planning objective. The Department concludes that the Company provided extensive information and discussion of items related to the third planning objective.

4. Planning Objective #4 - Ensure optimized utilization of electricity grid assets and resources to minimize total system costs

The Department analyzed MP’s IDP Report to see whether the information presented was related to and sufficient in detail to assess the IDP Report’s ability to actualize the fourth planning objective. Overall, the Department notes that the Company’s IDP Report provided information and discussion related to the fourth planning objective.

The Company explained that its planned Meter Data Management (MDM) will integrate several metering systems that the Company currently uses and combine them into one platform, resulting in far greater consistency and accuracy with customer billing and organized operational data for system sharing.⁵ Additionally, the Company’s plan to fully deploy Advanced Metering Infrastructure (AMI) by 2023 will further improve the utilization of the distribution system. The Company explained that AMI is “an advanced, two way metering system that provides metering, operational, and real-time notification of system conditions at customer premises for all retail customers”⁶ in which the “meters

³ IDP Report, at 23.

⁴ IDP Report, at 24.

⁵ IDP Report, at 10.

⁶ IDP Report, at 10.

act as ‘smart nodes’ at each customer’s premises, allowing a number of benefits including: efficient deployment of advanced time-based customer rate offerings; outage notifications; notification of service issues (such as low/high voltage, over current, and tamper warnings); improved load control; more frequent customer usage data; and the ability to more quickly reconnect customers who may have been involuntarily disconnected due to non-payment.”⁷

Another item described by MP related to the fourth planning objective is the Distribution Management System, which would enable new capabilities such as volt/VAR optimization and conservation voltage management.⁸ The Company explained later in the IDP Report that this capability could result in energy savings: the Company is considering a plan to implement a conservation voltage reduction/volt-VAR optimization (CVR/VVO) pilot that would reduce demand and delivered energy through the intentional operation of the distribution system in such a way that lowers the voltage profile along a feeder.”⁹ While the Company has not performed a cost-benefit analysis, it stated that “other utilities have observed a 1-4 percent savings on initial deployment.”¹⁰

The Department notes that this list is not exhaustive of the items discussed in the IDP Report that relate to the fourth planning objective. The Department concludes that the Company provided extensive information and discussion of items related to the fourth planning objective.

5. *Planning Objective #5 - Provide the Commission with the information necessary to understand the utility’s short-term and long-term distribution system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value*

The Department notes that the Company’s IDP Report provided information and discussion related to the fifth planning objective, however defers to the Commission as to whether the information provided was sufficiently comprehensive.

6. Conclusion

The Department again notes that our analysis of the IDP Report and the Commission’s Planning Objectives is not an exhaustive review of the IDP Report. Instead, as stated, since this is MP’s first IDP Report, the Department’s review focused on whether the Company provided information relevant to the planning objectives listed above and provided a starting point for future analyses that seek to ascertain whether the outcomes of the planning objectives are being actualized with each iteration of the IDP Report. The Department concludes that the information contained in the IDP Report is relevant to the Commission’s planning objectives and contains a sufficient amount of information to assess whether outcomes that the planning objectives articulate can materialize over time.

⁷ IDP Report, at 27.

⁸ IDP Report, at 12.

⁹ IDP Report, at 39.

¹⁰ IDP Report, at 40.

The Department also notes that, in Docket No. E002/CI-18-251, the Commission required Xcel Energy to perform a self-assessment of whether its IDP Report meets the Commission's planning objectives. Order Point #5 of the Commission's Order in that proceeding states:¹¹

Xcel shall discuss in future filings how the IDP meets the Commission's Planning Objectives, including:

- A. An analysis of how the information presented in the IDP related to each Planning Objective,
- B. The location in the IDP,
- C. Analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives, and
- D. Suggestions as to any refinements to the IDP filing requirements that would enhance Xcel's ability to meet the Planning Objectives.

Should the Commission continue to be interested in determining whether MP's IDP Report achieves the Commission's planning objectives, the Department recommends adopting the above-referenced Order Point from Xcel's IDP proceeding in this one as well.

The Department recommends that the Commission require Minnesota Power to discuss in future filings how the IDP meets the Commission's Planning Objectives, including:

- A. An analysis of how the information presented in the IDP related to each Planning Objective,**
- B. The location in the IDP,**
- C. Analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives, and**
- D. Suggestions as to any refinements to the IDP filing requirements that would enhance Minnesota Power's ability to meet the Planning Objectives. (Recommendation 2)**

C. FILING REQUIREMENTS PROVIDING THE MOST VALUE

In general, the Department's position regarding distribution system planning has focused on three overarching themes: (1) distribution system planning should itself be cost-effective and lead to outcomes that are also cost-effective; (2) distribution system planning reporting should correct a historic, long-term information asymmetry between regulators and utilities; and (3) IDP requirements between utilities should be consistent to the greatest extent practicable.

¹¹ [Order Accepting Report, and Amending Requirements](#), dated July 16, 2019, filed in Docket No. E002/CI-18-251.

IDP requirements that are responsive to these three themes are ones that the Department supports in principle. In practice, however, there exists the possibility that specific IDP requirements may be ineffective, superfluous, or worse, contravene the intent of distribution system planning and create opportunities for utilities to justify unnecessary expenditures of ratepayer funds.

At this nascent stage of the IDP process, however, it may be difficult to conclude which filing requirements provide the most value to the process, and conversely, which filing requirements do not provide value. It is important to ensure that IDP requirements and investments are reasonable and expected to lead to greater technical or economic efficiencies that are demonstrably beneficial to ratepayers and in the public interest. The Department expects future iterations of IDP Reports, and any utility investment proposals that are derivative of the IDP Reports, to shed light onto whether the distribution system planning process created by the Commission is leading to the intended outcomes.

Likewise, to the extent that this first IDP Report serves as a baseline to which future IDP Reports can be compared, the Department views MP's first IDP Report as foundational and expects to be able to assess the value of the distribution system planning process in general and the IDP requirements specifically in a more comprehensive and measured way in its review of subsequent IDP Reports.

Last, it is important that IDP Requirements between utilities should be as consistent as possible for a number of reasons: (1) to avoid creating a confusing regulatory morass of varied and disjunctive IDP Requirements between utilities; (2) to enable utilities, regulators, and Minnesota's stakeholder community to learn best practices and share lessons learned based on consistent information; (3) to enable a more uniform, transparent, and reproducible analysis of costs and benefits of utility investments in their distribution systems; and (4) to lead to uniform and interoperable technological solutions or planning processes that create economies of scale, enable more efficient and cost-effective distributed energy resource integration, improve system efficiency, and ultimately, reduce costs and increase benefits for Minnesota's ratepayers.

The Department maintains that an important focus for MP and other stakeholders should be on the "low-hanging fruit" of the distribution system: improvements that are likely to be beneficial to ratepayers regardless of the speed or scale of the technological change affecting the distribution system. These "no regrets" policies are demonstrably positive for ratepayers and utilities, and could result in better technical and economic efficiencies, and would not preclude even more beneficial outcomes (i.e. any action or investment avoids any lock-in effects). The Department expects to be able to assess which IDP Requirements are most beneficial and lead to a focus on the "low-hanging fruit" as the IDP process evolves and future iterations are made.

D. FILING REQUIREMENTS THAT REQUIRE MODIFICATION OR DELETION

Consistent with the Department's position that utility IDP Requirements should be as consistent to the greatest extent practicable, the Department has two recommendations regarding modifications that the Commission made to Xcel's IDP Requirements in Docket No. E002/CI-18-251 in its July 16, 2019

Order that the Department believes would be appropriate to make to MP's IDP Requirements. They are as follows:

Order Point #3 of the Commission's July 16, 2019 Order in Docket No. E002/CI-18-251 amended IDP Requirement 3.D.2 (xi) to read as follows:

For each grid modernization project in its 5-year Action Plan, require Xcel to provide a cost-benefit analysis based on the best information it has at the time and include a discussion of non-quantifiable benefits. Xcel shall provide all information to support its analysis.

The Department recommends that the Commission amend IDP Requirement 3.D.2 (xi) of Minnesota Power's IDP Requirements to read as follows:

For each grid modernization project in its 5-year Action Plan, require Minnesota Power to provide a cost-benefit analysis based on the best information it has at the time and include a discussion of non-quantifiable benefits. Minnesota Power shall provide all information to support its analysis. (Recommendation 3)

Order Point #4 of the Commission's July 16, 2019 Order in Docket No. E002/CI-18-251 merged IDP Requirements 3.D.1 and 3.D.2 to read as follows:

Xcel shall provide a 5-year Action Plan as part of a 10-year long-term plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures analysis, hosting capacity analysis, and non-wire alternatives analysis. The 5-year Action Plan should include a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (expanding on topics and categories listed above). Xcel should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum: [footnote omitted]

The Department recommends that the Commission merge IDP Requirement 3.D.1 and 3.D.2 of Minnesota Power's IDP Requirements to read as follows:

Minnesota Power shall provide a 5-year Action Plan as part of a 10-year long-term plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures analysis, hosting capacity analysis, and non-wire alternatives analysis. The 5-year Action Plan should include

a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (expanding on topics and categories listed above). Minnesota Power should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum: (Recommendation 4)

E. OTHER ISSUES

The fifth topic of the Commission's Notice asks whether there are other issues or concerns related to this matter.

The Department does not have any other issues or concerns related to this matter at this time.

IV. DEPARTMENT RECOMMENDATIONS

The Department appreciates the opportunity to comment on MP's 2019 IDP and looks forward to the review of other stakeholder comments. The Department makes the following, initial recommendations:

- **The Department recommends that the Commission accept MP's IDP. (Recommendation 1)**
- **The Department recommends that the Commission require Minnesota Power to discuss in future filings how the IDP meets the Commission's Planning Objectives, including:**
 - A. An analysis of how the information presented in the IDP related to each Planning Objective,**
 - B. The location in the IDP,**
 - C. Analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives, and**
 - D. Suggestions as to any refinements to the IDP filing requirements that would enhance Minnesota Power's ability to meet the Planning Objectives. (Recommendation 2)**
- **The Department recommends that the Commission amend IDP Requirement 3.D.2 (xi) of Minnesota Power's IDP Requirements to read as follows:**

For each grid modernization project in its 5-year Action Plan, require Minnesota Power to provide a cost-benefit analysis based on the best information it has at the time and include a discussion of non-quantifiable benefits. Minnesota Power shall provide all information to support its analysis. (Recommendation 3)

- **The Department recommends that the Commission merge IDP Requirement 3.D.1 and 3.D.2 of Minnesota Power's IDP Requirements to read as follows: to read as follows:**

Minnesota Power shall provide a 5-year Action Plan as part of a 10-year long-term plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures analysis, hosting capacity analysis, and non-wire alternatives analysis. The 5-year Action Plan should include a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (expanding on topics and categories listed above). Minnesota Power should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum: (Recommendation 4)

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CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E015/M-19-684

Dated this 15th day of **January 2020**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_19-684_M-19-684
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St Denver, CO 80204-8020	Electronic Service	No	OFF_SL_19-684_M-19-684
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-684_M-19-684
Ellen	Anderson	ellena@umn.edu	325 Learning and Environmental Sciences	1954 Buford Ave Saint Paul, MN 55108	Electronic Service	No	OFF_SL_19-684_M-19-684
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_19-684_M-19-684
Donna	Attanasio	dattanasio@law.gwu.edu	George Washington University	2000 H Street NW Washington, DC 20052	Electronic Service	No	OFF_SL_19-684_M-19-684
John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance	1313 5th St SE Ste 303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_19-684_M-19-684
Kenneth	Baker	Ken.Baker@walmart.com	Wal-Mart Stores, Inc.	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_19-684_M-19-684
Sara	Baldwin Auck	sarab@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156 Latham, NY 12110	Electronic Service	No	OFF_SL_19-684_M-19-684
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ryan	Barlow	ryan.barlow@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101214	Electronic Service	Yes	OFF_SL_19-684_M-19-684
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_19-684_M-19-684
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	OFF_SL_19-684_M-19-684
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-684_M-19-684
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-684_M-19-684
Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric	2411 W. Bridge St PO Box 485 Owatonna, MN 55060-0485	Electronic Service	No	OFF_SL_19-684_M-19-684
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-684_M-19-684
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-684_M-19-684
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-684_M-19-684
Jason	Burwen	j.burwen@energystorage.org	Energy Storage Association	1155 15th St NW, Ste 500 Washington, DC 20005	Electronic Service	No	OFF_SL_19-684_M-19-684
LORI	CLOBES	lclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_19-684_M-19-684
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_19-684_M-19-684
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_19-684_M-19-684
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_19-684_M-19-684
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-684_M-19-684
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-684_M-19-684
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Solar	14333 Orchard Rd. Minnetonka, MN 55345	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_19-684_M-19-684
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-684_M-19-684
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_19-684_M-19-684
Carlton	Doyle Fontaine	carlon.doyle.fontaine@senate.mn	MN Senate	75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul, MN 55155	Electronic Service	No	OFF_SL_19-684_M-19-684
Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No	OFF_SL_19-684_M-19-684
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_19-684_M-19-684
Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte	100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul, MN 55155	Electronic Service	No	OFF_SL_19-684_M-19-684
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_19-684_M-19-684
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_19-684_M-19-684
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-684_M-19-684
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-684_M-19-684
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_19-684_M-19-684
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_19-684_M-19-684
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-684_M-19-684
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-684_M-19-684
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_19-684_M-19-684
Timothy	Gulden	timothy.gulden@yahoo.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	OFF_SL_19-684_M-19-684
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.	701 E. Cary Street Richmond, VA 23219	Electronic Service	No	OFF_SL_19-684_M-19-684
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_19-684_M-19-684
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-684_M-19-684
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_19-684_M-19-684
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_19-684_M-19-684
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-684_M-19-684
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_19-684_M-19-684
Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue Saint Paul, Minnesota 55104	Electronic Service	No	OFF_SL_19-684_M-19-684
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_19-684_M-19-684
John S.	Jaffray	jjaffray@jrpowers.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_19-684_M-19-684
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_19-684_M-19-684
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_19-684_M-19-684
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_19-684_M-19-684
Jennifer	Kefer	jennifer@dgardiner.com	Alliance for Industrial Efficiency	David Gardiner & Associates, LLC 2609 11th St N Arlington, VA 22201-2825	Paper Service	No	OFF_SL_19-684_M-19-684
Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave Ste 200 Lakeville, MN 55044	Paper Service	No	OFF_SL_19-684_M-19-684
Ted	Kjos	tkjos@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_19-684_M-19-684
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_19-684_M-19-684
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_19-684_M-19-684
Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_19-684_M-19-684
Jon	Kramer	sundialjon@gmail.com	Sundial Solar	3209 W 76th St Edina, MN 55435	Electronic Service	No	OFF_SL_19-684_M-19-684
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_19-684_M-19-684
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
Matthew	Lacey	mlacey@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-684_M-19-684
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-684_M-19-684
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Wayzata, MN 55391	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annie	Levenson Falk	annielf@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-684_M-19-684
Benjamin	Lowe	N/A	Alevo USA Inc.	101 S Stratford Rd Ste 210 Winston Salem, NC 27107-4224	Paper Service	No	OFF_SL_19-684_M-19-684
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-684_M-19-684
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-684_M-19-684
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-684_M-19-684
Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	OFF_SL_19-684_M-19-684
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_19-684_M-19-684
John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_19-684_M-19-684
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-684_M-19-684
Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_19-684_M-19-684
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_19-684_M-19-684
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-684_M-19-684
Dale	Niezwaag	dniezwaag@bepec.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503	Electronic Service	No	OFF_SL_19-684_M-19-684
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy	426 17th Street, Suite 700 Oakland, CA 94612	Electronic Service	No	OFF_SL_19-684_M-19-684
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_19-684_M-19-684
David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400 Burlington, MA 01803	Electronic Service	No	OFF_SL_19-684_M-19-684
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_19-684_M-19-684
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_19-684_M-19-684
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_19-684_M-19-684
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_19-684_M-19-684
Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-684_M-19-684
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_19-684_M-19-684
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute	1000 Vermont Ave, Third Floor Washington, DC 20005	Electronic Service	No	OFF_SL_19-684_M-19-684
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-684_M-19-684
Gregory	Randa	granda@lakecountrypower.com	Lake Country Power	26039 Bear Ridge Drive Cohasset, MN 55721	Electronic Service	No	OFF_SL_19-684_M-19-684
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-684_M-19-684
Michael	Reinertson	michael.reinertson@avanteenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_19-684_M-19-684
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-684_M-19-684
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_19-684_M-19-684
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-684_M-19-684
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_19-684_M-19-684
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-684_M-19-684
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_19-684_M-19-684
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_19-684_M-19-684
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_19-684_M-19-684
Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology	120 Tredegar Street Richmond, Virginia 23219	Electronic Service	No	OFF_SL_19-684_M-19-684
William	Seuffert	Will.Seuffert@state.mn.us		75 Rev Martin Luther King Jr Blvd 130 State Capitol St. Paul, MN 55155	Electronic Service	No	OFF_SL_19-684_M-19-684
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.	180 N. LaSalle Street Suite 3700 Chicago, Illinois 60601	Electronic Service	No	OFF_SL_19-684_M-19-684
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-684_M-19-684
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-684_M-19-684
Audra	Skalet	askalet@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_19-684_M-19-684
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_19-684_M-19-684
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No	OFF_SL_19-684_M-19-684
Ken	Smith	ken.smith@evergreenenergy.com	Ever Green Energy	305 Saint Peter St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-684_M-19-684
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-684_M-19-684
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_19-684_M-19-684
Tom	Stanton	tstanton@nrri.org	NRRI	1080 Carmack Road Columbus, OH 43210	Electronic Service	No	OFF_SL_19-684_M-19-684
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-684_M-19-684
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_19-684_M-19-684
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-684_M-19-684
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-684_M-19-684
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_19-684_M-19-684
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-684_M-19-684

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Karen	Turnboom	karen.turnboom@versocom	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_19-684_M-19-684
Andrew	Twite	twite@fresh-energy.org	Fresh Energy	408 St. Peter Street, Ste. 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-684_M-19-684
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-684_M-19-684
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_19-684_M-19-684
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_19-684_M-19-684
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_19-684_M-19-684
Thomas J.	Zaremba	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_19-684_M-19-684
Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwy Court Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_19-684_M-19-684