414 Nicollet Mall
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September 8, 2015

—Via Electronic Filing—

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

RE: ANSWER TO RECONSIDERATION AND CLARIFICATION PETITIONS
COMMUNITY SOLAR GARDENS PROGRAM
DOCKET NO. E002/M-13-867

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Answer to the Petitions for Reconsideration, Rehearing, and Clarification filed by parties on August 26, 2015 in response to the Commission's August 6, 2015 Order in this docket.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at aakash.chandarana@xcelenergy.com or (612) 215-4663 if you have any questions regarding this filing.

Sincerely,

/s/

AAKASH CHANDARANA
REGIONAL VICE PRESIDENT
RATES AND REGULATORY AFFAIRS

Enclosure
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF ITS PROPOSED COMMUNITY SOLAR GARDENS PROGRAM	DOCKET NO. E002/M-13-867

ANSWER TO THE REQUEST FOR CLARIFICATION OF THE MINNESOTA DEPARTMENT OF COMMERCE, DIVISION OF ENERGY RESOURCES, AND SUNRISE ENERGY VENTURES LLC'S PETITION FOR REHEARING AND RECONSIDERATION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, respectfully submits this Answer in response to the Minnesota Department of Commerce, Division of Energy Resources' Request for Clarification and Sunrise Energy Venture LLC's Petition for Rehearing and Reconsideration. For the reasons set forth below, we request the Commission deny the Petitions.

Prior to the Commission's deliberations in late June, the Company and interested stakeholders spent significant time and effort trying to reach a settlement agreement that would help move our community solar gardens program, Solar*Rewards Community, forward. While we and the other parties have disagreed on the program's specific challenges, there was a general understanding and acceptance that the program was heading down a path not contemplated by the Legislature—and one that could ultimately prove to be unworkable.

To help develop a path forward, at least on an interim basis, the Company and several developers agreed to the terms of the Partial Settlement Agreement (PSA).[1] The heart of the PSA, set forth in Sections 2.2 and 2.3, established co-location restrictions, recognized the technical limits of the existing distribution system, established a path for accelerating the application process, created more transparency in the application process, and established a process for refining program rules over the course of next year.[2] Upon reviewing the PSA, the Commission agreed that it "sets forth a workable solution consistent with the public interest and the statutory intent to create a solar-garden program that is community-focused."[3] The Commission's decision to adopt Sections 2.2 and 2.3 of the PSA is well-reasoned and supported by the record.

Since the conclusion of the June deliberations, the Company has focused on administering the program as envisioned by the PSA and is currently working with developers to complete engineering studies, execute interconnection agreements, and begin construction. To that end, in a couple of weeks, we will be providing a status update on the program, including a break-out of all the projects in queue and ideas for meaningful reporting in the future.

With their respective Petitions, the Department, in part, and Sunrise, in total, seek to materially change and substantially undo the workable solutions that the settling parties have brought forward and the Commission has adopted. We candidly admit our disappointment with their decisions to do so. Through their petitions, the Department and Sunrise continue to pursue outcomes that will hinder forward momentum and shift the focus once again to the regulatory process rather than implementation.

The reconsideration petitions call into question the fundamental underpinnings of the PSA and resurrect uncertainty about the program's future. For context, prior to the execution of the PSA, developers and participating customers sought certainty around seeing community solar gardens placed into service before the investment tax credit (ITC) step-down in 2016. The Company also sought certainty that the reliability of our system would not be compromised and the financial impact on our non-participating customers would be appropriately restrained. It was through this mutual desire for certainty that the settling parties were able to reach a near-term solution that moves the program forward in a more balanced way. Through compromise and willingness to work together, we were able to reach reasonable outcomes that allow

[1] *In re Pet. of N. States Power Co. for Approval of Its Proposed Cmty. Solar Gardens Program*, Docket No. E002/M-13-867, Partial Settlement Agreement (June 22, 2015).
[2] *Id.* at 2-5.
[3] Docket No. E002/M-13-867, Order Adopting Partial Settlement as Modified at 13 (Aug. 6, 2015).

the program to move forward rather than seeking recourse from the court of appeals or the Federal Energy Regulatory Commission.

To the extent the Department's request for clarification regarding interconnection upgrades or program divesture or Sunrise's Petition for Reconsideration are granted, uncertainty will be recast over the program. We will have to re-engage with stakeholders to consider new solutions for moving the program forward, or pursue options in other venues.

With that being said, neither the Department nor Sunrise has met the Commission's standard for granting a petition for reconsideration or clarification. Each bears the burden of proving that the challenged order is unlawful or unreasonable.[4] In making that assessment, the Commission looks to whether the petition raises new issues, identifies new and relevant evidence, exposes errors or ambiguities, or otherwise provides persuasive justification for rethinking its decisions.[5] The Department and Sunrise have not raised new issues, brought forward new evidence, exposed any errors or ambiguities, or raised any other concern sufficient to reopen this matter. Accordingly, the Petitions should be denied.

DISCUSSION

I. THE DEPARTMENT'S REQUEST FOR CLARIFICATION

In its petition, the Department asks the Commission to reconsider the following: (1) the material upgrade cap; (2) the independent engineer process; (3) application tracking; and (4) divestiture for projects exceeding the five megawatt cap.[6] We believe the Commission need not address any of these issues for the reasons outlined below.

A. Eliminating or Modifying the One-Million-Dollar Upgrade Limit

The Department asks the Commission to clarify the Order by removing or modifying the limits on distribution system upgrades set forth in Section 2.2(b) of the PSA.[7] In support, the Department notes that the state and federal Public Utilities Regulatory Policies Act (PURPA) schemes prohibit restricting interconnection access to the

[4] Minn. Stat. § 216B.27, subd. 3.
[5] *In re Appl. of N. States Power Co., a Minn. Corp., for Auth. to Increase Rates for Gas Serv. in Minn.*, Docket No. G-002/GR-09-1153, Order Denying Recons. (Jan. 28, 2011).
[6] Docket No. E002/M-13-867, Req. for Clarification of the Minn. Dep't of Commerce, Div. of Energy Res. at 1-2 (Aug. 26, 2015).
[7] *Id.* at 4-8.

distribution system.[8] Before explaining our disagreement with the Department's position, we first provide the commercial context supporting section 2.2(b).

The PSA provides that there will be no Material Upgrades to the distribution system for a community solar garden project.[9] The PSA identifies examples of the types of upgrades that are, by definition, material—adding substation transformers, upgrading existing substation transformers, installing new feeder bays, new overhead feeders, or new underground feeders—and provides for an aggregate materiality cap of $1 million per site.[10] Essentially, the Company and settling parties agreed to work within the existing electrical confines of our distribution system. There was recognition that taking the system as it is today would ensure system reliability for all customers and alleviate the need to undertake long-lead time upgrades, resulting in more projects being built. Agreeing to limit distribution upgrades was fundamental to the settlement because the construction of most Material Upgrades is time-consuming. The estimated lead time for constructing substation transformers, for example, is 12 to 15 months. In addition, there is a limited amount of time before the ITC step-down at the end of next year and a significant number of projects in the community solar garden queue. The settling parties also recognized that the language in Section 2.2(b) would serve to enforce the five MW co-location limit. In this way, Section 2.2(b) is the crux of the PSA.

The Department's proposed alternative, which eliminates the restrictions on Material Upgrades, will upset the careful balance struck by the parties and approved by the Commission. At the outset, we note that a settlement provides us, and the Commission, with the flexibility to reach terms that enable the program to move forward notwithstanding PURPA. We further note the Department's reliance on PURPA is selective; there is no discussion about avoided cost pricing and certain purchase exemptions. Neither PURPA nor the Minnesota Administrative Procedure Act permit arbitrary and selective application of existing rules.

To the extent the Department is concerned about our community solar garden program being consistent with state and federal law, we share that concern. In prior filings we raised these concerns and offered to seek guidance from the FERC.[11] The Company remains open to that alternative.

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[8] *Id.* at 7.
[9] Docket No. E002/M-13-867, Partial Settlement Agreement at 4 (June 22, 2015).
[10] *Id.*
[11] *See, e.g.*, Docket No. E002/M-13-867, Comments of Xcel Energy at 6 (May 18, 2015).

We also disagree with the Department's second alternative that asks the Commission to create exceptions to the agreement regarding Material Upgrades.[12] Accepting this alternative will render the parties' Section 2.2(b) useless. If necessary, the Commission may explore these issues during the contested case process recently proposed by the Company.[13]

B. The Independent Engineer Process

The Department proposes to clarify Section 2.2.a.(v) to minimize the delay resulting from resolving disputes and to ensure applicants of the dispute resolution process are not responsible for costs of the independent engineer to the extent the Company behaves unreasonably.[14] To accomplish this, the Department advances the following three specific changes to Section 2.2.a.(v): (1) the independent engineer's decision is final and binding unless appealed to the Commission, (2) the independent engineer can require the Company to pay the costs of the dispute resolution if the Company caused "excess costs" in the dispute resolution process, and (3) the Company will not be able to recover the costs for dispute resolution if the Company deviates from certain technical standards which cause delay.[15] We respectfully disagree with the Department's proposal as being premature and vague.

In negotiating the PSA, we understood that material disputes regarding the application process and the technical details in the interconnection studies could arise. For that reason the parties agreed to the dispute resolution process in Section 2.2.a(v), which further requires the parties to identify a "clear dispute resolution process" following the Effective Date.[16] Thus, the Department's clarification is premature. In the near term, the Company will submit for comment and consideration a proposed tariff containing provisions which, if accepted by the Commission, would implement the August 6 Order, including the provisions on the independent engineer review process. The concerns raised by the Department would be better addressed in comments to this upcoming draft tariff filing.

To the extent the Commission is considering adopting the Department's proposal, we note that it is too vague to provide meaningful guidance to the Company or

[12] Docket No. E002/M-13-867, Req. for Clarification of the Minn. Dep't of Commerce, Div. of Energy Res. at 7-8 (Aug. 26, 2015).
[13] Docket No. E002/M-13-867, Prospective Program Design – Req. for Investigation Cmty. Solar Gardens at 1-2 (July. 23, 2015).
[14] Docket No. E002/M-13-867, Req. for Clarification of the Minn. Dep't of Commerce, Div. of Energy Res. at 8-10 (Aug. 26, 2015).
[15] *Id.* at 9-10.
[16] Docket No. E002/M-13-867, Partial Settlement Agreement at 3-4 (June 22, 2015).

stakeholders. For example, if the Company seeks review from the Commission after an independent engineer's decision, is that "failure to cooperatively work toward a solution" such that the Company will bear all of the costs of dispute resolution? Additionally, by what standard will the independent engineer decide if the Company was cooperatively working toward a solution? Avoiding these pitfalls is exactly the reason the Company believes a collaborative effort is the preferred approach for establishing a dispute resolution process.

Furthermore, the Department's proposal could result in bad public policy. The role of the independent engineer would be expanded to a fact finder about matters beyond their technical expertise (i.e., "find that excess costs of dispute resolution were the result of the Company's failure to be responsive to requests for information or its failure to cooperatively work toward a solution"). The Department's proposal could also incentivize more – not fewer – disputes since the costs could be shifted entirely onto the Company. What is more, it creates a construct that could penalize the Company for building facilities consistent with its own standards, which could exceed the minimum requirements set forth in the codes, standards and rules that would serve as the measuring stick in the Department's proposal. The Company publishes system standards for safety, power quality, reliability, and long-term stable operations. An independent engineer will need to take into account the installation and use standards we require of our system.

Additionally, we note the Department's proposal does not raise any new issues or material facts that would prompt granting reconsideration or clarification.

C. The Application-Tracking Process

The Department's clarifications as to application-tracking should be denied for the same reasons.[17] Namely, the request for reconsideration raises no new facts or issues, and the suggested modifications are premature. As with the dispute resolution process, the parties should be given an opportunity to jointly develop an application-tracking process, and that process should be given an opportunity to work.

D. Ownership Transfers

The Department seeks clarification on whether a developer can divest the megawatts it has in the queue above the five MW co-location limit.[18] To the extent the

[17] Docket No. E002/M-13-867, Req. for Clarification of the Minn. Dep't of Commerce, Div. of Energy Res. at 10-11 (Aug. 26, 2015).
[18] *Id.* at 11-12.

Department seeks clarification on this issue, we would ask the Commission to confirm that a developer cannot divest its megawatts in excess of the five MW cap and, for those divested projects, remain in the queue.

To the extent the Department seeks a modification of the rule, the Commission should deny reconsideration. Divestiture was the subject of a robust debate and, following lengthy deliberations, the Commission decided the issue.[19] In the absence of new or different facts, the Department should not have the opportunity to reargue a settled issue.

We also note the Department's suggestion that for a "limited period of time," applicants may transfer "any or all" of their ownership interests without loss of queue position could create an end run around the five MW co-location restriction contained in the PSA, and approved by the Commission. From a public policy perspective, the August 6 Order recognized that the purpose of our community solar garden program is to help foster community based programs – not utility scale solar.[20] Allowing ownership transfers will impede that public policy goal rather than foster it. Indeed, one can envision a scenario where developers parcel out ten, 5-MW applications to other developers through alternate ownership schemes resulting in a 50-MW project in ten, 5-MW increments, rather than fifty, 1-MW increments. Such a result would place the program in the same position it was prior to the June deliberations.

For all of these reasons, reconsideration should be denied.

II. SUNRISE'S REQUEST FOR RECONSIDERATION

The Commission procedures, culminating in the August 6 Order, were proper and Sunrise's suggestions to the contrary are not credible. Sunrise has not and cannot identify a basis for reconsideration; its petition should be denied.

As an initial matter, the Commission is vested with both quasi-judicial and quasi-legislative powers under Minn. Stat. § 216A.05, subd 1. Whether acting in either capacity or a combination thereof, there can be no question that the Commission has met its burden here. If the Commission's actions are viewed as quasi-legislative, to be overturned there must be a showing that the Commission abused its discretion.[21] No abuse of discretion has even been alleged. If the Order is quasi-judicial in nature it

[19] June 25 Hearing Tr. at 210-13, 220, 228-29. Transcript was filed in this Docket July 20, 2015.
[20] Docket No. E002/M-13-867, Order Adopting Partial Settlement as Modified at 13 (Aug. 6, 2015).
[21] *In re the Appls. for Auth. to Provide Alternative Operator Servs. in Minn.,* 490 N.W.2d 920, 925 (Minn. Ct. App. 1992).

will be upheld if it is supported by substantial evidence.[22] The extensive record developed in this docket and the well-reasoned and detailed Order establishes a robust record that meets the substantial evidence test.

A. Procedural Claims

Sunrise argues that the Commission's August 6 Order is unenforceable for six reasons.[23] As set forth below, Sunrise fails to satisfy its burden on any of the six grounds and, therefore, is not entitled to reconsideration or a stay.

1. The August 6 Order was not an unpromulgated rule

First, Sunrise argues the Commission's August 6 Order is an unpromulgated rule and, thus, void.[24] Sunrise's position is contrary to well-established law. Indeed, administrative policy may be formulated by promulgating rules or through case-by-case determination.[25] "Whether to proceed by rulemaking or adjudication is a decision left to the informed discretion of the agency."[26] In this case, the Commission decided to promulgate the program rules through its Order. Because the community solar gardens program is new and any Commission decision would apply only to Xcel Energy, the Commission's decision to promulgate program rules through a case-by-case determination was appropriate and does not provide grounds for reconsideration.[27] Particularly where, as here, Sunrise acknowledged that a case-by-case determination was appropriate.[28]

2. Issuance of August 6 Order does not violate statute

Sunrise also argues that the August 6 Order is improper because the Commission "failed to make the findings required by the Solar Garden Statute."[29] Sunrise's position is contradicted by the record. In addition to addressing the statutory factors

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[22] *St. Paul Area Chamber of Commerce v. Minn. Pub. Serv. Comm'n*, 251 N.W.2d 350, 358 (Minn. 1977).
[23] Docket No. E002/M-13-867, Sunrise Energy Ventures LLC's Pet. for Reh'g & Recons. (Aug. 26, 2015).
[24] *Id.* at 12-16.
[25] *Bunge Corp. v. Comm'r of Revenue*, 305 N.W. 2d 779, 785 (Minn. 1981).
[26] *In re Investigation into Intra-LATA Equal Access & Presubscription*, 532 N.W. 2d 583, 590 (Minn. Ct. App. 1995).
[27] *See id.* (noting that promulgating a rule through case-by-case adjudication is appropriate if "the agency . . . has insufficient experience with a particular program" or the issue is unique to the particular facts of the case).
[28] Docket No. E002/M-13-867, Sunrise Energy Ventures LLC's Pet. for Reh'g & Recons. at 18(Aug. 26, 2015).
[29] *Id.* at 24.

during deliberations, the Commission analyzed the factors in its September 17 Order approving the program.[30] In the August 6 Order, the Commission simply exercised its statutory authority to revisit a previous order.[31] The Commission's failure to mechanically recite the statutory factors in making these limited changes to the program is not a basis for reconsidering the Order.

3. Referral of case to the Office of Administrative Hearings

Sunrise next argues that the Commission was required, pursuant to Minn. Stat. § 216B.09, subd. 1, to refer the case to the Office of Administrative Hearings (OAH) for an evidentiary hearing. Section 216B.09, however, does not provide Sunrise or any other party with a right to an evidentiary hearing. Instead, the Commission can choose, as it did in this case, to develop a record.[32] Here the Commission opened multiple comment rounds on these issues and held two days of oral argument and deliberations. In light of this record, the Commission's decision not to refer the matter to an evidentiary hearing does not form a basis for reconsideration.

4. Procedural due process claims are without merit

Sunrise contends the Commission's procedures violated its due process rights. Again, that argument finds no support in the record. The Commission opened multiple comment rounds in this docket and held two days of oral argument and deliberations. In light of the robust record and extensive hearings—*in which Sunrise participated*—its claim that the Commission violated procedural due process are unfounded.[33] "The fundamental requirements of due process are notice and an opportunity to be heard at a meaningful time and in a meaningful manner."[34] What is more, "quasi-judicial proceedings do not invoke the full panoply of procedures required in regular judicial proceedings."[35]

Even so, as established, Sunrise received notice of the Commission's hearing, submitted multiple comments in this docket, and appeared at the hearings both

[30] Docket No. E002/M-13-867, Order Approving Solar-Garden Plan with Modifications (Sept. 17, 2014).
[31] Minn. Stat. § 216B.25.
[32] Minn. Stat. § 216.16.
[33] *See, e.g.*, Docket No. E002/M-13-867 Letter from Sunrise Energy Ventures LLC, Fresh Energy, and SunShare, LLC (Feb. 20, 2015); Docket No. E002/M-13-867, Comment of Solar Garden Community (Apr. 2, 2015); Docket No. E002/M-13-867, Comment of Solar Garden Community (May 18, 2015).
[34] *Rew v. Bergstrom*, 845 N.W.2d 764, 786 (Minn. 2014) (internal quotation marks omitted).
[35] *Barton Contracting Co., v. City of Afton*, 268 N.W.2d 712, 716 (Minn. 1978).

through its Chief Executive Officer[36] and as a member of the Solar Gardens Community.[37] Sunrise's participation demonstrates that the Commission not only provided Sunrise with a meaningful opportunity to be heard, but that Sunrise was, in fact, heard on multiple occasions and in multiple forms. Reconsideration on this basis is not warranted.

5. No entitlement to reconsideration based on an Open Meeting Law claim

Sunrise argues that the Commission violated Minnesota's Open Meeting Law. Sunrise refers to the ten-minute break in the June 23 hearing and suggests the Commission's proceedings were "irregular."[38] In the draft Complaint submitted with its Petition, Sunrise goes further—accusing the Commission of having violated Minnesota's Open Meeting Law.[39] Even assuming Sunrise's unsubstantiated allegations have merit—which Xcel does not believe—Sunrise still has not stated a basis for reconsideration. The law is clear; the sole remedy for an Open Meeting Law violation is a civil fine—not invalidation of a resulting order.[40]

6. The five MW limitation is not arbitrary or capricious

Sunrise also argues that the Commission's five MW limitation on co-location is arbitrary and capricious.[41] A decision is arbitrary and capricious if "the decision lacks any rational basis."[42] The standard is a deferential one which assumes that, so long as an agency engaged in reasoned decision making, the decision is proper.[43]

Here, the Commission relied on the statute's express one MW cap to conclude that "large groups of co-located 1 MW solar gardens are inconsistent with the statute's clear community-focused purpose."[44] The Commission explained that "allowing unlimited co-location [would] render the 1 MW limitation superfluous."[45] The Commission also noted that, without restrictions on co-location, non-participating customers would face significant bill impacts—a conclusion supported by the factual

[36] June 25 Hearing Tr. at 14-32, Comments of Dean Leischow.
[37] June 23 Hearing Tr. at 114, Comments of Andrew Moratzka.
[38] Docket No. E002/M-13-867, Sunrise Energy Ventures LLC's Petition for Rehearing & Reconsideration at 7(Aug. 26, 2015).
[39] *Id.* at Ex. C at 25-26.
[40] *Pet. of D&A Truck Line, Inc.*, 524 N.W.2d 1, 6 (Minn. Ct. App. 1994).
[41] Docket No. E002/M-13-867, Sunrise Energy Ventures LLC's Pet. for Reh'g and Recons. at 25 (Aug. 26, 2015).
[42] *City of Mankato v. Mahoney*, 542 N.W.2d 689, 692 (Minn. Ct. App. 1996).
[43] *Reserve Mining Co. v. Herbst*, 256 N.W.2d 808, 825 (Minn. 1977).
[44] Docket No. E002/M-13-867, Order Adopting Partial Settlement as Modified at 13 (Aug. 6, 2015).
[45] *Id.*

record.[46] For all of these reasons, the Commission's Order is not subject to reconsideration on this basis.

B. Applicability of PURPA

Sunrise, like the Department, asserts that FERC's PURPA interconnection regulations should apply to the community solar gardens program.[47] We explained above our disagreement with selectively arguing for PURPA applicability and reiterate, by reference, those arguments here.

CONCLUSION

Despite the procedural uncertainty created by the Petitions, we are fully engaged with advancing the Solar*Rewards Community program. We look forward to providing the Commission and interested stakeholders with an update on the progress of the program within two weeks.

The decisions included in the August 6 Order were reasonable, necessary for the continued viability of the program, and nothing in the Petitions should cause the Commission to grant reconsideration.

Dated: September 8, 2015

Northern States Power Company

[46] *Id.*

[47] Docket No. E002/M-13-867, Sunrise Energy Ventures LLC's Pet. for Reh'g & Recons. at 28 (Aug. 26, 2015).

CERTIFICATE OF SERVICE

I, Jim Erickson, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

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

xx electronic filing

Docket No. E002/M-13-867

Dated this 8th day of September 2015

/s/

_____

Jim Erickson
Regulatory Administrator

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Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Madeleine	Klein	mklein@socoreenergy.com	SoCore Energy	225 W Hubbard Street Suite 200 Chicago, IL 60654	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
John	Kluempke	jwkluempke@winlectric.com	Elk River Winlectric	12777 Meadowvale Rd Elk River, MN 55330	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jon	Kramer	jk2surf@aol.com	Sundial Solar	4708 york ave. S Minneapolis, MN 55410	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Holly	Lahd	lahd@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 St. Paul, MN 55102	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Dean	Leischow	dean@sunriseenergyventures.com	Sunrise Energy Ventures	601 Carlson Parkway, Suite 1050 Minneapolis, MN 55305	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Rebecca	Lundberg	rebecca.lundberg@powerfullygreen.com	Powerfully Green	11451 Oregon Ave N Champlin, MN 55316	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

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Erica	McConnell	emcconnell@kfwlaw.com	Keyes, Fox & Wiedman LLP	436 14th Street, Suite 1305 Oakland, California 94612	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
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Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
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Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
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SaGonna	Thompson	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
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Jason	Willett	jason.willett@metc.state.mn.us	Metropolitan Council	390 Robert St N Saint Paul, MN 55101-1805	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Daniel	Williams	DanWilliams.mg@gmail.com	Powerfully Green	11451 Oregon Avenue N Champlin, MN 55316	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel