



33 South Sixth Street, Suite 4200
Minneapolis, Minnesota 55402
main 612.373.8800
fax 612.373.8881
www.stoel.com

August 29, 2013

ANDREW P. MORATZKA
Direct (612) 373-8822
apmoratzka@stoel.com

VIA E-FILING

Burl W. Haar
Public Utilities Commission
121 7th Place East
Suite 350
St. Paul, MN 55101-2147

**Re: In the Matter of the Implementation of Solar Energy Standards Pursuant to 2013
Amendments to Minnesota Statutes, Section 216B.1619
Docket No. E999/CI/13-542**

Dear Dr. Haar:

The Solar Exempt Group (“SEG”), a group of large industrial customers exempt from the Solar Energy Standard obligations under section 216B.1691 subd. 2f (“SES”) submits this very brief comment in response to the Minnesota Public Utilities Commission’s (the “Commission’s”) Notice of Comment dated July 25, 2013 (the “SES Notice”).

SEG understands the topics open for comment under the SES Notice are limited to the utilities’ filings regarding their respective SES obligations. SEG further understands that the Commission will issue future notice(s) regarding implementation of SES, including mechanisms for accurately calculating and excluding SES costs from exempt customers’ bills. SEG looks forward to providing comments on those important issues.

As it pertains to the SES Notice, SEG understands that the Commission seeks comment on, *inter alia*, whether it should establish procedures and/or require utilities to file tariffs relating to customer exclusions, verification procedures, reporting requirements, etc. SEG would not object to the Commission creating a more formal process for review. However, SEG believes it is premature for the Commission to reach a decision on this issue until the utilities, the Minnesota Department of Commerce - Division of Energy Resources, and other stakeholders have had a chance to discuss and provide additional input to the Commission. SEG is happy to partake in that process to ensure any reporting process and applications are not unduly burdensome.



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Very truly yours,

Stoel Rives LLP

/s/ Andrew P. Moratzka

Andrew P. Moratzka

APM:kap
Enclosures
cc: Service List

CERTIFICATE OF SERVICE

I, Kathy Prestidge, hereby certify that I have this day, served a true and correct copy of the following documents 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 at Minneapolis, Minnesota.

SOLAR EXEMPT GROUP (“SEG”) COMMENT IN RESPONSE TO MINNESOTA PUBLIC UTILITIES COMMISSION’S NOTICE OF COMMENT DATED JULY 25, 2013

In the Matter of the Implementation of Solar Energy Standards Pursuant to 2013 Amendments to Minnesota Statutes, Section 216B.1619
Docket No. E999/CI/13-542

Dated this 29th day of August, 2013.

/s/ Kathy Prestidge

Kathy Prestidge

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	abbey@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 220 St Paul, MN 55102-1125	Paper Service	No	SPL_SL_13- 542_Interested Parties
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 28th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St Paul, MN 551012134	Electronic Service	Yes	SPL_SL_13- 542_Interested Parties
John	Aune	johna@bluehorizonsolar.com	Blue Horizon Energy	7246 Washington Ave S Eden Prairie, MN 55344	Paper Service	No	SPL_SL_13- 542_Interested Parties
Peter	Belthon	pbelthon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Paper Service	No	SPL_SL_13- 542_Interested Parties
William A.	Blazar	bbblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St Paul, MN 55101	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Michael J.	Bull	N/A	Center for Energy and Environment	212 Third Avenue North, Suite 560 Minneapolis, MN 55401	Paper Service	No	SPL_SL_13- 542_Interested Parties
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St Paul, MN 55101	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Joel	Cammon	jcammon@tenksolar.com	Tenk Solar, Inc.	9549 Penn Avenue S Bloomington, MN 55431	Electronic Service	No	SPL_SL_13- 542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John J.	Carroll	jcarroll@newportpartners.com	Newport Partners, LLC	9 Cushing, Suite 200 Irvine, California 92618	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Steve W.	Chriss	Stephen.chriss@wal-mart.com	Wal-Mart	2001 Southeast 10th St. Bentonville, AZ 72716-5530	Paper Service	No	SPL_SL_13- 542_Interested Parties
Steve	Coleman	scoleman@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Paper Service	No	SPL_SL_13- 542_Interested Parties
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Avenue Minneapolis, MN 55403	Paper Service	No	SPL_SL_13- 542_Interested Parties
Chris	Davis	christopher.davis@state.mn.us	Department of Commerce	Suite 500 85 Seventh Place East St Paul, MN 551012198	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Dustin	Denison	N/A	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Paper Service	No	SPL_SL_13- 542_Interested Parties
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St Paul, MN 55101	Electronic Service 1400	Yes	SPL_SL_13- 542_Interested Parties
Dan	Donkers	N/A	Saint Paul - Ramsey County Public Health	Environmental Health Section 2785 White Bear Ave., Suite 350 Maplewood, MN 55109	Paper Service	No	SPL_SL_13- 542_Interested Parties
Bill	Droessler	N/A	Izaak Walton League of America-MWO	1619 Dayton Ave Ste 202 Saint Paul, MN 55104	Paper Service	No	SPL_SL_13- 542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Paper Service	No	SPL_SL_13- 542_Interested Parties
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Paper Service	No	SPL_SL_13- 542_Interested Parties
Benjamin	Gerber	bgerber@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St Paul, Minnesota 55101	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St Paul, MN 551011667	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Bill	Grant	Bill.Grant@state.mn.us	Minnesota Department of Commerce	85 7th Place East, Suite 500 St Paul, MN 55101	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Lloyd	Grooms	lgrooms@winthrop.com	Winthrop and Weinstine	Suite 3500 225 South Sixth Street Minneapolis, MN 554024629	Paper Service	No	SPL_SL_13- 542_Interested Parties
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St Paul, MN 551012147	Electronic Service	Yes	SPL_SL_13- 542_Interested Parties
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 Fourth Ave. S., Ste 700 Minneapolis, MN 55415-1842	Paper Service	No	SPL_SL_13- 542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Paper Service	No	SPL_SL_13- 542_Interested Parties
Samuel	Hanson	N/A	Biggs And Morgan, P.A.	2200 IDS Center E 80 South Eighth Street Minneapolis, MN 55402	Paper Service	No	SPL_SL_13- 542_Interested Parties
Jack	Hays	nathan.franzen@westwood ps.com	Westwood Professional Services	7699 Anagram Drive Eden Prairie, MN 55344	Paper Service	No	SPL_SL_13- 542_Interested Parties
Brandon	Heath	bheath@misoenergy.org	MISO Energy	1125 Energy Park Drive St Paul, MN 55108-5001	Paper Service	No	SPL_SL_13- 542_Interested Parties
Lynn	Hinkle	lhinkle@mmseia.org	Minnesota Solar Energy Industries Association	2512 33rd Ave South #2 Minneapolis, MN 55406	Paper Service	No	SPL_SL_13- 542_Interested Parties
Holly	Hinman	holly.r.hinman@xcelenergy .com	Xcel Energy	414 Nicollet Mall, 6th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Margaret	Hodnik	mhodnik@mmpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Jan	Hubbard	Jan@AppliedEnergyInnova tions.org	Applied Energy Innovations, LLC	4000 Minnehaha Avenue South Minneapolis, MN 55406	Paper Service	No	SPL_SL_13- 542_Interested Parties
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of Saint Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	SPL_SL_13- 542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ralph	Jacobson	N/A	Innovative Power Systems, Inc.	1413 Hunting Valley Rd Ste 1 Saint Paul, MN 55109-1555	Paper Service	No	SPL_SL_13-542_Interested Parties
Dwight	Jelle	dkjelle@gmail.com	Best Power International, LLC	P.O. 5126 Hopkins, MN 55343	Electronic Service	No	SPL_SL_13-542_Interested Parties
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	SPL_SL_13-542_Interested Parties
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	SPL_SL_13-542_Interested Parties
Richard	Johnson	johnsonr@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Center 90 South Seventh Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13-542_Interested Parties
Mara	Koeller	mara.n.koeller@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-542_Interested Parties
Jon	Kramer	jk2surf@aol.com	Sundial Solar	4708 york ave. S Minneapolis, MN 55410	Electronic Service	No	SPL_SL_13-542_Interested Parties
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-542_Interested Parties
Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_13-542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Lindell	agonud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	SPL_SL_13- 542_Interested Parties
Bob	Long	rlong@larkinhoffman.com	Larkin Hoffman (Silicon Energy)	1500 Wells Fargo Plaza 7900 Xerxes Ave S Bloomington, MN 55431	Paper Service	No	SPL_SL_13- 542_Interested Parties
Rebecca	Lundberg	rebecca.lundberg@powerfullygreen.com	Powerfully Green	11451 Oregon Ave N Champlin, MN 55316	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Paula	Maccabee	Pmaccabee@visi.com	Just Change Law Offices	1961 Selby Avenue St. Paul, MN 55104	Paper Service	No	SPL_SL_13- 542_Interested Parties
Casey	Maccullum	casey@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Paper Service	No	SPL_SL_13- 542_Interested Parties
Susan	Mackenzie	susan.mackenzie@state.mn.us	Public Utilities Commission	Suite 350121 7th Place East St. Paul, MN 551012147	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Paper Service	No	SPL_SL_13- 542_Interested Parties
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 St. Paul, MN 55104-1850	Paper Service	No	SPL_SL_13- 542_Interested Parties
Brian	Millberg	Brian.Millberg@minneapolismn.gov	City of Minneapolis	350 South 5th St, #315 Minneapolis, MN 55415	Paper Service	No	SPL_SL_13- 542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Stacy	Miller	stacy.miller@state.mn.us	Department of Commerce	State Energy Office 85 7th Place East, Suite 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_13- 542_Interested Parties
David	Moeller	dmoeller@gallate.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Martin	Morud	mmorud@trunorthsolar.co m	Tru North Solar	5115 48th Ave S Minneapolis, MN 55417	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Michael	Noble		Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Paper Service	No	SPL_SL_13- 542_Interested Parties
Rolf	Nordstrom	rnordstrom@gplisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Kate	O'Connell	kate.oconnell@state.mn.us	Department of Commerce	Suite 50085 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Donna	Pickard	dpickard@aladdinsolar.co m	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Charlie	Pickard	cpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_13- 542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gayle	Prest	gayle.prest@minneapolis.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Paper Service	No	SPL_SL_13- 542_Interested Parties
Kent	Ragsdale	kenragsdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Enio	Ricci	ericci@inenergyllc.com	Inenergy LLC	17830 New Hampshire Ave Ste 300 Ashton, MD 20861	Paper Service	No	SPL_SL_13- 542_Interested Parties
Michelle	Rosier	michelle.rosier@sierraclub.org	Sierra Club	2327 E. Franklin Avenue Minneapolis, MN 554061024	Paper Service	No	SPL_SL_13- 542_Interested Parties
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137 Minneapolis, MN 55402	Paper Service	No	SPL_SL_13- 542_Interested Parties
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129 St. Paul, MN 55116	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Janet	Shaddix Eiling	jshaddix@janeshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Bloomington, MN 55431	Electronic Service Fwy	No	SPL_SL_13- 542_Interested Parties
Gary	Shaver	N/A	Silicon Energy	3506 124th St NE Marysville, WA 98271	Paper Service	No	SPL_SL_13- 542_Interested Parties
Erin	Shea	eshea@silicon-energy.com	Silicon Energy	11168 Sumter Circle Bloomington, MN 55438	Electronic Service	No	SPL_SL_13- 542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Doug	Shoemaker	dougs@mmRenewables.org	MRES	2928 5th Avenue South Minneapolis, MN 55408	Paper Service	No	SPL_SL_13- 542_Interested Parties
Chanti	Sourignavong	chantipal.sourignavong@honeywell.com	Honeywell	1985 Douglas Drive North MN10-111A Golden Valley, MN 55422-3992	Paper Service	No	SPL_SL_13- 542_Interested Parties
Erin	Stojan Ruccolo		Fresh Energy	408 Saint Peter St Ste 220 Saint Paul, MN 55102-1125	Paper Service	No	SPL_SL_13- 542_Interested Parties
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Deb	Sundin	deb.sundin@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13- 542_Interested Parties
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401 1993	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Jason	Willet	N/A	Metropolitan Council	390 Robert St N Saint Paul, MN 55101-1805	Paper Service	No	SPL_SL_13- 542_Interested Parties
Daniel	Williams	N/A	Powerfully Green	11451 Oregon Avenue N Champlin, MN 55316	Paper Service	No	SPL_SL_13- 542_Interested Parties
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_13- 542_Interested Parties