



414 Nicollet Mall  
Minneapolis, MN 55401

December 7, 2023

—Via Electronic Filing—

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: REPLY COMMENTS – 2024 VALUE OF SOLAR CALCULATION  
COMMUNITY SOLAR GARDENS PROGRAM  
DOCKET NO. E002/M-13-867

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to the Commission's September 22, 2023 Notice of Comment Period and the Comments submitted by the Department of Commerce (Department). We appreciate the Department's review of our filing and provide a reply below.

#### 1. Environmental Costs

The Department recommended that the 2024 Value of Solar (VOS) calculation be updated to reflect current developments related to social cost of carbon dioxide, based on Minn. Stat. § 216B.2422 Subd 3 and the Commission's vote<sup>1</sup> to update the Commission's January 3, 2018 Order in Docket E999/CI-14-643 to adopt the draft cost of greenhouse gas emissions valuations from the Environmental Protection Agency's External Review Draft of Report on the Social Cost of Greenhouse Gases released in September 2022.

The written order from this hearing has not yet been issued. Based on our review of the recording from this hearing, Commissioner Schuerger's motion, later adopted by the Commission, begins at about 1:58:00 of the recording and includes the following:

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<sup>1</sup> September 14, 2023 Hearing on Docket Nos. E999/CI-07-1199 and E999/DI-22-236

- A. Adopt Decision Option 11, which stated:  
Update the Commission's January 3, 2018 Order in Docket E-999/CI-14-643 to provisionally adopt and apply the draft cost of greenhouse gas emissions valuations presented in the United States Environmental Protection Agency's EPA External Review Draft of Report on the Social Cost of Greenhouse Gases released in September 2022, and its successors. (Agencies)
- B. Adopt a modified version of Staff Alternative 14, and as modified stated:  
Direct the Executive Secretary to open Comment Period(s) as needed in Docket No. E999/CI-14-643 to consider a process for:  
a) application of the draft cost of greenhouse gas emissions valuations presented in the United States Environmental Protection Agency's EPA External Review Draft of Report on the Social Cost of Greenhouse Gases released in September 2022, and its successors, [as required by Minn. Stat. s 216B.2422, subd. 3(b)]; and  
b) adoption of the working group estimates released by the federal Interagency Working Group on the Social Cost of Greenhouse Gases or its successors, [as required by Minn. Stat. § 216B.2422, subd.3(c)].

We also note our understanding that the EPA has recently adopted final values which are the same as the draft values.

The Company does not believe that the provisions of Minn. Stat. § 216B.2422, Subd 3 apply to the calculation of the VOS. Based on the adoption of the modified version of Staff Alternative 14, the Executive Secretary can issue a comment schedule to consider a process for application of these values for purposes of the calculation of the VOS in Docket No. E999/CI-14-643. This statute, 216B.2422, is within the Resource Planning statute, and its provisions relate to Resource Planning. The calculation of update to the VOS is not a Resource Planning function. Subd. 3, as recently amended is shown as follows, with new changes shown in redline:

Subd. 3. Environmental costs.

(a) The commission shall, to the extent practicable, quantify and establish a range of environmental costs associated with each method of electricity generation. A utility shall use the values established by the commission in conjunction with other external factors, including socioeconomic costs, when evaluating and selecting resource options in

all proceedings before the commission, including resource plan and certificate of need proceedings.

(b) The commission shall provisionally adopt and apply the draft cost of greenhouse gas emissions valuations presented in the United States Environmental Protection Agency's EPA External Review Draft of Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances, released in September 2022, including the time horizon, global estimates of damages, and the full range of discount rates from 2.5 to 1.5 percent, with two percent as the central estimate. The commission shall adopt the estimates contained in the final version of the external review draft report when it becomes available.

(c) If, at any time, the estimates adopted by the commission under paragraph (a) are exceeded by estimates released by the federal Interagency Working Group on the Social Cost of Greenhouse Gases or its successors, the commission shall adopt the working group estimates.

(d) The commission shall establish interim environmental cost values associated with each method of electricity generation by March 1, 1994. These values expire on the date the commission establishes environmental cost values under paragraph (a).

As shown above, the context of the new language is for the Utility to use the environmental costs in Subd. 3 for “evaluating and selecting resource options”, and the VOS calculation does not fit in that category.

The Company continues to believe that the federal social cost of carbon is not suitable for use in ratemaking, and that it would be more appropriate to use the regulatory cost of CO<sub>2</sub> if environmental costs are to be considered in rates. Even so, the Company followed the Department’s methodology and filed the 2024 VOS calculation using the current environmental costs available at the time of filing. The Company notes that many of the data assumptions in the VOS change over the course of time, but the VOS is not updated throughout the year due to the existence of new information, nor should it be in the 2024 VOS if a new federal social cost of carbon is adopted after the VOS is filed. The Company recommends that our September 1, 2023 filing on the 2024 VOS be approved as filed, and any changes to the federal social cost of carbon be incorporated into a future VOS if applicable.

## 2. Future VOS Filings

The Department recommends that the Company continue to recalculate and file the VOS annually, citing Minnesota Stat § 216B.164 subd 10, part (h), that says utilities shall recalculate an alternative tariff on an annual cycle and file for Commission approval. However, subdivision 10 relates to approval of an alternative tariff at the Company's request.<sup>2</sup> At this time the Company does not have a need or request for this bill credit compensation tariff beyond the approved VOS rates in the Community Solar Garden tariff today for Legacy Community Solar Gardens. Absent a Company need and/or request, subdivision 10 part (h) is not applicable on its own and should therefore not be applied in this instance. The Company also notes that other utilities have not indicated a need or presented a request for approval of an alternative tariff, nor are they required to file the alternative tariff calculation under the Department's VOS methodology.

If the Commission prefers that the Company continue to file the annual VOS calculation, we believe that the appropriate docket for future VOS filings would be Docket No. E999/M-14-65. In Attachment A of this filing, the Company provides recommendations of treatment of compliance obligations if the calculation is to continue.

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 Lynnette Sweet at 651-208-3268 or [Lynnette.m.sweet@xcelenergy.com](mailto:Lynnette.m.sweet@xcelenergy.com) or contact me at 612-330-2905 or [nick.paluck@xcelenergy.com](mailto:nick.paluck@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

NICK PALUCK  
MANAGER, REGULATORY ANALYSIS

Enclosure  
cc: Service List

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<sup>2</sup> See, Subd. 10, (a) of this statute, which states in part: "A public utility may apply for commission approval for an alternative tariff that compensates customers through a bill credit mechanism for the value to the utility, its customers, and society for operating distributed solar photovoltaic resources interconnected to the utility system and operated by customers primarily for meeting their own energy needs."

Minnesota Public Utilities Commission's April 6, 2023 Order Approving Xcel's 2023 Value-of-Solar Rate			
Order Point	Current Requirements	Compliance	Future Compliance Obligation
2.	The Commission declines to adopt changes to the avoided distribution cost calculation component of the existing VOS methodology.	2024 VOS methodology was not changed	No future compliance obligation.
3.	The Commission authorizes expiration of the residential adder with the 2022 VOS vintage, recognizing that the Commission will consider the issue of the adder for the 2023 VOS vintage after Xcel files its May 2023 adder final evaluation.	5/1/23 Resi Adder Filing 7/24/23 Initial Comments 8/21/23 Reply Comments	No future compliance obligation.
4.	The Commission accepts the offer from developers and interested parties to file information related to the residential adder differentials by April 1, 2023.	5/1/23 Resi Adder Filing 7/24/23 Initial Comments 8/21/23 Reply Comments	No future compliance obligation.
5.	Xcel must work with the Department and stakeholders on possible adders including but not limited to (1) an income-qualified adder, (2) required allocation for residential/income-qualified customers, and (3) a cost-neutral mixed adder; the Commission accepts the Department's offer to file a summary by May 1, 2023.	5/1/23 Resi Adder Filing 7/24/23 Initial Comments 8/21/23 Reply Comments	No future compliance obligation.
6.	In its May 1, 2023, compliance filing that includes language for exempting the adder for new Building Subscription Model subscribers, Xcel must include a date for implementation; the Commission delegates authority to the Executive Secretary to approve Xcel's proposed language. If no objections to the language are filed within 30 days, Xcel must update its tariffs as needed.	5/1/23 Resi Adder Filing 7/24/23 Initial Comments 8/21/23 Reply Comments	No future compliance obligation.

Minnesota Public Utilities Commission's April 6, 2022 Order Approving Xcel's 2022 Value-of-Solar Rate			No future compliance obligation.
<i>No new compliance requirements.</i>			

Minnesota Public Utilities Commission's March 9, 2021 Order Approving Xcel's 2021 Value-of-Solar Rate			
Order Point	Current Requirements	Compliance	Compliance Obligation
3.	Xcel, the Minnesota Department of Commerce, Division of Energy Resources (the Department), and stakeholders shall discuss the application of the actual photovoltaic fleet shape to effective load carrying capability, peak load reduction, loss savings, and solar-weighted heat rate, as well as the possibility of developing a new profile-based approach as described by Xcel. Xcel shall file a proposal for potential changes for the 2022 value of solar by July 1, 2021.	5/18/21 SRCMN Stakeholder Workgroup Meeting 7/1/21 PV Fleet Shape Proposal 7/2/21 PV Fleet Shape Supplement	No future compliance obligation.

<b>Minnesota Public Utilities Commission's March 4, 2020 Order Approving Xcel's Update to the 2020 Value-of-Solar Rate</b>			
<b>Order Point</b>	<b>Current Requirements</b>	<b>Compliance</b>	<b>Compliance Obligation</b>
3.	For future annual VOS update filings, Xcel shall do the following:	-	
a.	File by September 1.	9/1/22 2024 VOS Calculation	No future compliance obligation, but if required move to 14-65
b.	Include in the filing:	-	
i.	A list of all changed parameters as permitted by the approved VOS Methodology, and any updated input values;	9/1/22 2024 VOS Calculation, Letter, Part B - VOS Input Parameters	No future compliance obligation, but if required move to 14-65
ii.	A discussion, along with any necessary tables, charts, and explanations, of how these changes will affect the VOS rate, as well as variables within the rate;	9/1/22 2024 VOS Calculation, Letter, Part B - VOS Input Parameters	No future compliance obligation, but if required move to 14-65
iii.	Hourly PV fleet production data for PV systems 1 MW and under in the utility service territory, including:	Commission's March 9, 2021 Order, Point 3, superseded the 2020 Order regarding PV Fleet Shape.	No future compliance obligation, but if required move to 14-65
	synchronized, time-stamped hourly values of average	Commission's March 9, 2021 Order, Point 3, superseded the 2020 Order regarding PV Fleet Shape.	No future compliance obligation, but if required move to 14-65
1.	power over the same load analysis period and corresponding to the same hourly intervals,	Commission's March 9, 2021 Order, Point 3, superseded the 2020 Order regarding PV Fleet Shape.	No future compliance obligation, but if required move to 14-65
2.	data for every hour of the load analysis period, and	Commission's March 9, 2021 Order, Point 3, superseded the 2020 Order regarding PV Fleet Shape.	No future compliance obligation, but if required move to 14-65
3.	a load analysis period including multiple contiguous years, with complete one-year periods, using available and correct data; and	Commission's March 9, 2021 Order, Point 3, superseded the 2020 Order regarding PV Fleet Shape.	No future compliance obligation, but if required move to 14-65
iv.	Sufficient evidence and data to support these changes.	Provided throughout September 1, 2022 filing	No future compliance obligation, but if required move to 14-65

<b>Minnesota Public Utilities Commission's March 22, 2019 Order Approving Changes to Distributed Solar Value Methodology as Modified and Requiring Further Filings</b>			
<b>Order Point</b>	<b>Non-Expired Requirements</b>	<b>Compliance</b>	<b>Compliance Obligation</b>
4.	For future annual VOS update filings, Xcel shall do the following:	-	
c	Convene a meeting no later than August 1 to explain in detail to those in attendance each of the items identified above.	7/28/2022 Q3 SRCMN Stakeholder Workgroup Meeting; 8/9/2022 emailed revised calculation to the Solar*Rewards Community Implementation Workgroup.	No future compliance obligation.

Minnesota Public Utilities Commission's December 3, 2019 Order Approving Changes to Distributed Solar Value Methodology as Modified and Requiring Further Filings			
Order Point	Current Requirements	Compliance	Compliance Obligation
1.	The Commission approves Xcel's proposed methodology for calculating the avoided distribution cost component for the 2020 VOS rate applied to the CSG program, except for the 50% deferral-reduction factor.	-	No future compliance obligation, but if required move to 14-65
b.	Xcel shall report annually on its planned and actual distribution spending, along with the placement of CSGs to assist with evaluating Xcel's avoided distribution cost calculation methodology for possible future use in locational differentiation.	Attachment B	No future compliance obligation, but if required move to 14-65

## CERTIFICATE OF SERVICE

I, Ella Giefer, 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

or

xx electronic filing

**Docket No.        E002/M-13-867**

Dated this 7<sup>th</sup> day of December 2023

/s/

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Ella Giefer  
Regulatory Administrator



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	ross.abbey@us-solar.com	United States Solar Corp.	100 North 6th St Ste 222C  Minneapolis, MN 55403	Electronic Service	No	OFF_SL_13-867_Official
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211  Minneapolis, MN 55405	Electronic Service	No	OFF_SL_13-867_Official
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St  Denver, CO 80204-8020	Electronic Service	No	OFF_SL_13-867_Official
Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP	396 Hayes Street  San Francisco, CA 94102	Electronic Service	No	OFF_SL_13-867_Official
Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC	855 Village Center Drive #256  North Oaks, MN 55127	Electronic Service	No	OFF_SL_13-867_Official
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
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_13-867_Official
Gabriel	Chan	gabechan@umn.edu	University of Minnesota	130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, MN 55455	Electronic Service	No	OFF_SL_13-867_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-867_Official
Kevin	Cray	kevin@communitysolaraccess.org	CCSA	1644 Platte St  Denver, CO 80202	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Timothy	DenHerder Thomas	timothy@cooperativeenerg yfutures.com	Cooperative Energy Futures	3500 Bloomington Ave. S  Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
James	Denniston	james.r.denniston@xcelen ergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_13-867_Official
Brian	Edstrom	briane@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_13-867_Official
Betsy	Engelking	betsy@nationalgridrenewa bles.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd  Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_13-867_Official
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_13-867_Official
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_13-867_Official
Nathan	Franzen	nathan@nationalgridrenew ables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd  Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_13-867_Official
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway  Minneapolis, MN 55405	Electronic Service	No	OFF_SL_13-867_Official
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_13-867_Official
Sean	Gosiewski	sean@afors.org	Alliance for Sustainability	2801 21st Ave S Ste 100 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
Scott	Greenbert	scott@nautilussolar.com	Nautilus Solar Energy, LLC	396 Springfield Aver, Ste 2 Summit, NJ 07901	Electronic Service	No	OFF_SL_13-867_Official
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_13-867_Official
Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments	8100 Boone Blvd Suite 430 Vienna, VA 22182	Electronic Service	No	OFF_SL_13-867_Official
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_13-867_Official
Julie	Jorgensen	juliejorgensen62@gmail.com	Greenmark Solar	4630 Quebec Ave N New Hope, MN 55428-4973	Electronic Service	No	OFF_SL_13-867_Official
Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC	4710 Blaylock Way Inver Grove Heights, MN 55076	Electronic Service	No	OFF_SL_13-867_Official
Ralph	Kaehler	Ralph.Kaehler@gmail.com		13700 Co. Rd. 9 Eyota, MN 55934	Electronic Service	No	OFF_SL_13-867_Official

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, MN 55118	Electronic Service	No	OFF_SL_13-867_Official
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9  Chicago, IL 60604	Electronic Service	No	OFF_SL_13-867_Official
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_13-867_Official
Aaron	Knoll	aknoll@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200  Wayzata, MN 55391	Electronic Service	No	OFF_SL_13-867_Official
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-867_Official
Alice	Madden	alice@communitypowermn.org	Community Power	2720 E 22nd St  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_13-867_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 E 7th St  St Paul, MN 55106	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jason	Maur	jason.maur@renesolapower.com	Renesola Power Holdings, LLC	850 Canal Street 3rd Floor Stamford, CT 06902	Electronic Service	No	OFF_SL_13-867_Official
Matthew	Melewski	matthew@nokomisenergy.com	Nokomis Energy LLC & Ole Solar LLC	2639 Nicollet Ave Ste 200  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, MN 55120	Electronic Service	No	OFF_SL_13-867_Official
Michael	Menzel	mike.m@sagiliti.com	Sagiliti	23505 Smithtown Rd. Suite 280 Excelsior, MN 55331	Electronic Service	No	OFF_SL_13-867_Official
Marc	Miller	mmiller@soltage.com	Soltage, LLC	66 York Street, 5th Floor  Jersey City, NJ 07302	Electronic Service	No	OFF_SL_13-867_Official
Marcus	Mills	Marcus@communitypowermn.org	Community Power	2720 E 22nd St  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_13-867_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Pouya	Najmaie	pouya@cooperativeenergyfutures.com	Cooperative Energy Futures	3416 16th Ave S  Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220  Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_13-867_Official
Logan	O'Grady	logrady@mNSEIA.org	Minnesota Solar Energy Industries Association	2288 University Ave W  St. Paul, MN 55114	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patty	O'Keefe	patty.okeefe@sierraclub.org		2525 Emerson Ave S Apt 2  Minneapolis, MN 55405	Electronic Service	No	OFF_SL_13-867_Official
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_13-867_Official
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_13-867_Official
Eric	Pasi	ericp@ips-solar.com	IPS Solar	2670 Patton Rd  Roseville, MN 55113	Electronic Service	No	OFF_SL_13-867_Official
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive  Belmont, CA 94002	Electronic Service	No	OFF_SL_13-867_Official
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_13-867_Official
Morgan	Pitz	morgan.pitz@us-solar.com	US Solar	100 N 6th St #410B Minneapolis, MN 55403	Electronic Service	No	OFF_SL_13-867_Official
Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now	N/A	Electronic Service	No	OFF_SL_13-867_Official
Paula	Prahl	paula.prahl@dominiuminc.com	Dominium	2905 Northwest Blvd Ste 150 Plymouth, MN 55441	Electronic Service	No	OFF_SL_13-867_Official
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_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_13-867_Official
Jonathan	Roberts	jroberts@soltage.com	Soltage	66 York St 5th Floor Jersey City, NJ 07302	Electronic Service	No	OFF_SL_13-867_Official
Delaney	Russell	delaney@mnipl.org	Just Solar Coalition	4407 E Lake Street  Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
Kyle	Samejima	kyle@mplsclimate.org	Minneapolis Climate Action	N/A	Electronic Service	No	OFF_SL_13-867_Official
Ian	SantosMeeker	ians@ips-solar.com	IPS Solar	N/A	Electronic Service	No	OFF_SL_13-867_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_13-867_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-867_Official
David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions	2303 Wycliff St Ste 300  St. Paul, MN 55114	Electronic Service	No	OFF_SL_13-867_Official
Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC	233 Park Ave S Ste 201  Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_13-867_Official
Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light	N/A	Electronic Service	No	OFF_SL_13-867_Official
Anna	Tobin	atobin@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Zack	Townsend	zachary.townsend@brookfi eldrenewable.com	Brookfield Renewable	200 Liberty St FL 14  New York, NY 10281	Electronic Service	No	OFF_SL_13-867_Official
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_13-867_Official
John	Vaughn	Nik@rreal.org	Rural Renewable Energy Alliance	3963 8th Street SW  Backus, MN 55435	Electronic Service	No	OFF_SL_13-867_Official
Kevin	Walker	KWalker@beaconinterfaith. org	Beacon Interfaith Housing Collaborative	N/A	Electronic Service	No	OFF_SL_13-867_Official
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_13-867_Official
Jessica	Welk	jwelk@sherman- associates.com	Sherman Associates	233 Park Avenue South Suite 201 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Curtis P	Zaun	curtis@cpzlaw.com	Attorney At Law	3254 Rice Street  Little Canada, MN 55126	Electronic Service	No	OFF_SL_13-867_Official