



Minnesota Center for Environmental Advocacy

The legal and scientific voice protecting and defending Minnesota's environment

26 East Exchange Street - Suite 206
Saint Paul, MN 55101-1667

651.223.5969
651.223.5967 fax

mcea@mncenter.org
www.mncenter.org

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February 10, 2014

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

VIA ELECTRONIC SERVICE

*Re: In the Matter of Implementation of Solar Energy Standards Pursuant to
the 2013 Amendments to Minnesota Statutes Section 216B.1691.
PUC Docket No. E999/CI-13-542*

Dear Dr. Haar:

In connection to the above-referenced matter please find the enclosed Reply Comments filed on behalf of Fresh Energy, Izaak Walton League of America – Midwest Office, and the Environmental Law and Policy Center. Also attached is the Affidavit of Service.

Thank you.

Sincerely,

s/Beth Goodpaster
Beth Goodpaster
Energy Program Director

BG/lh

Enclosure

cc: Attached service list

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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**In the Matter of Implementation of Solar
Energy Standards Pursuant to 2013 Amendments
to Minnesota Statutes, Section 216B.1691**

Docket No. E999/CI-13-542

**REPLY COMMENTS OF ENVIRONMENTAL LAW
AND POLICY CENTER, FRESH ENERGY,
AND IZAAK WALTON LEAGUE OF AMERICA**

1. Should the Commission issue any clarifications on SREC shelf life?

As stated in our initial comments, we believe it is important to clarify what shelf life will apply to SRECs generated during the period between August 31, 2013 and January 1, 2020 that are not retired towards the 2020 compliance requirement.

In its initial filing, the Department of Commerce highlighted language from a 2007 Commission Order that explained that adopting an explicit REC shelf life:

achieves a balance between the goals of encouraging new generation and allowing utilities to reap incentives and efficiencies from longer-range planning in the development of new renewable resources and compliance strategies, while avoiding the creation of a glut of renewable energy credits on the emerging market.¹

We find this logic to be persuasive, and as applicable to solar PV as to renewable energy more generally. Because we are unaware of a convincing argument against applying the four-year REC shelf life to SRECs, as a general matter we recommend that course of action.

The Department suggests that a shelf life begin attaching to SRECs generated in 2020 and thereafter.² But we do not read the statute as requiring a 2020 start date. Instead, the statute merely requires that no shelf life expire by January 1, 2020. Thus, a shelf life could initially adhere to new SRECs in 2016 and those SRECs would not expire by January 1, 2020.³

¹ December 18, 2007 Order in Docket No. E999/CI-04-1616 (establishing a four-year shelf life for RECs meaning that RECs could be retired for RES compliance in "the year of generation plus four years").

² Department Comments at 3. ("In other words, S-RECs with a vintage falling between the effective date of the statute and January 2020 would not have the time prior to January 2020 count against their four-year shelf life.")

³ For example, the "the year of generation plus four years" for a system installed in 2016 would be 2020.

Consistent with this approach, we support Geronimo Energy's recommendation outlined in their initial comments:

Geronimo recommends that the Commission find that S-RECs generated after August 1, 2013 through December 31, 2015 be allowed to be used for compliance in 2020. For S-RECs generated in 2016 and beyond, S-RECs should retain the same shelf life – year of generation + four years – as all other RECs.⁴

This approach will help avoid a predictable SREC over-supply problem that would otherwise occur in the post-2020 period, while also supporting near-term solar investments in order to capture the enhanced federal Investment Tax Credit currently set to expire at the end of 2016.

1b. Solar facility location.

We acknowledge and support Xcel Energy's position that “[S]RECs associated with energy generated by solar facilities outside of Minnesota that serve [Xcel's] Minnesota retail customers may be counted toward compliance[.]”⁵ Our support is based in part on our understanding that this is the standard practice applied to RECs under the RES.

2. Should the Commission issue a clarification on the compliance enforcement provision's application to the SES?

See initial comments at 2-3.⁶

3. What information should be provided in the utilities' annual reports on the SES?

As noted by the Department of Commerce and others, the answer to this question may change over time, as Minnesota experiences solar market growth and gains more experience in tracking utility performance towards the 2020 solar standard.

For this reason, we agree with the Department's recommendation that the Commission (1) require utilities subject to the SES to include their SES reporting requirements in their annual RES filing (due June 1 of each year), while (2) preserving the Commission's ability to revise SES reporting requirements as advisable once accelerated development gets underway and the 2020 deadline approaches.

In terms of SES report content, we reiterate the additional considerations discussed in our initial comments, including:

- Compliance toward the 10 percent SES carve out for systems sized under 20 kW; and
- Data breakouts by relevant sub-categories (*e.g.*, solar project scale and type).⁷

⁴ Geronimo Energy initial comments at 2.

⁵ Xcel Energy initial comments at 4.

⁶ Initial Comments of Environmental Law and Policy Center, Fresh Energy, and Izaak Walton League of America (Docket No. E999/CI-13-542) at 2-3.

⁷ *Id.* at 3-4.

We also suggest that SES reports include a list of customers that have opted out of the SES.

4. Should the Commission authorize an additional tracking system to track compliance with the SES?

We agree with the Department of Commerce's recommendation that the Commission "not establish[] a separate tracking system solely for SES compliance, as it will be administratively inefficient and unnecessarily costly. . . ."⁸

In addition, it is important that participation and transaction fees be reviewed and appropriately adjusted to fairly incorporate the relevant solar-generator categories expected as part of the SES (*e.g.*, homeowner, small commercial, etc.), recognizing that the small facilities are likely to have fewer resources and be less sophisticated than many of the "repeat" players, such as REC marketers and utilities.

We appreciate the opportunity to provide these reply comments to the Commission.

Very truly yours,

/s/ Ross Abbey
Ross Abbey
Policy Associate
Fresh Energy
408 St. Peter Street, Suite 220
St. Paul, MN 55102
(651) 294-7144
abbey@fresh-energy.org

/s/ Allen Gleckner
Allen Gleckner
Staff Attorney
Environmental Law & Policy Center
2356 University Ave W, Suite 403
St. Paul, MN 55114
(651) 789-1407

/s/ Eric Jensen
Eric Jensen
Energy Associate
Izaak Walton League of America –
Midwest Office
1619 Dayton Avenue, Suite 202
St. Paul, MN 55104
(651) 649-1446

⁸ Department of Commerce initial comments at 4.

STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

In the Matter of Implementation of Solar
Energy Standards Pursuant to the 2013
Amendments to Minnesota Statutes Section
216B.1691.

AFFIDAVIT OF SERVICE

PUC Docket No. E999/CI-13-542

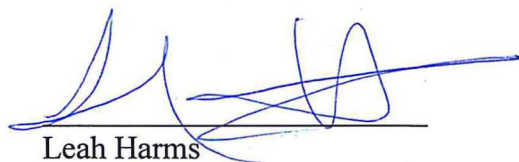
STATE OF MINNESOTA)
)ss.
COUNTY OF RAMSEY)

Leah Harms being duly sworn, says that on the 10th day of February, 2014 she served via U.S. mail and e-dockets the following:

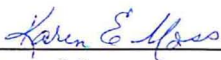
- Reply Comments on behalf of Fresh Energy, Izaak Walton League of America – Midwest Office, and the Environmental Law and Policy Center

on the following persons, in this action, by filing through e-dockets or mailing to them a copy thereof, enclosed in an envelope, postage prepaid, and by depositing the same in the post office at St. Paul, Minnesota, directed to said persons at the last known mailing address of said persons:

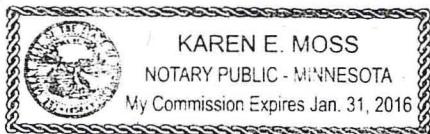
Attached Service List.


Leah Harms

Subscribed and sworn to before me
this 10th day of February, 2014



Karen Moss



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	Electronic Service	No	SPL_SL_13-542_Interested Parties
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th 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	Beithon	pbeithon@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	Electronic Service	No	SPL_SL_13-542_Interested Parties
William A.	Blazar	bblazar@mnychamber.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@stata.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	Cannon	jcannon@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	Electronic 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	dustin@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Electronic 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	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	Electronic 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	Electronic 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	Electronic 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 4th Ave S Ste 700 Minneapolis, MN 55415-1842	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
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	SPL_SL_13-542_Interested Parties
Samuel	Hanson	N/A	Briggs 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	jack.hays@westwoodps.com	Westwood Professional Services	7699 Anagram Drive Eden Prairie, MN 55344	Electronic Service	No	SPL_SL_13-542_Interested Parties
Brandon	Heath	bheath@misoenergy.org	MISO Energy	1125 Energy Park Drive St. Paul, MN 55108-5001	Electronic Service	No	SPL_SL_13-542_Interested Parties
Lynn	Hinkle	lhinkle@mnseia.org	Minnesota Solar Energy Industries Association	2512 33rd Ave South #2 Minneapolis, MN 55406	Electronic 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@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	SPL_SL_13-542_Interested Parties
Jan	Hubbard	Jan@AppliedEnergyInnovations.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	Rick.Johnson@lawmoss.com	Moss & Barnett	90 South 7th Street Suite #4800 Minneapolis, MN 554024129	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
John	Lindell	agorud.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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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@justchangela w.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	kmairi@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	Electronic 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
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

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	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.com	Tru North Solar	5115 45th Ave S Minneapolis, MN 55417	Electronic Service	No	SPL_SL_13-542_Interested Parties
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	SPL_SL_13-542_Interested Parties
Rolf	Nordstrom	rnordstrom@gpsid.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
Charlie	Pickard	cpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_13-542_Interested Parties
Donna	Pickard	dpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_13-542_Interested Parties
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Paper Service	No	SPL_SL_13-542_Interested Parties
Kent	Ragsdale	kentragdale@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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Enio	Ricci	ericci@invenergyllc.com	Invenergy 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	Electronic 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 Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	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
Doug	Shoemaker	dougs@mnRenewables.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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Erin	Stojan Ruccolo	ruccolo@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 220 Saint Paul, MN 55102-1125	Electronic 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 554011993	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	Willett	jason.willett@metc.state.mn.us	Metropolitan Council	390 Robert St N Saint Paul, MN 55101-1805	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Daniel	Williams	DanWilliams.mg@gmail.com	Powerfully Green	11451 Oregon Avenue N Champlin, MN 55316	Electronic 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