

November 19, 2025

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. E002,E015,E017/CI-24-288

Dear Ms. Bergman,

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*In the Matter of Establishing Tariffs for Distribution System Cost Sharing for
Interconnection in Constrained Areas*

The commission investigation was initiated by the Commission on August 30, 2024.

The Department recommends approval of the Reactive DER Upgrade Cost Sharing Standards, and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

AZ/ar
Attachment



Before the Minnesota Public Utilities Commission

Reply Comments of the Minnesota Department of Commerce

Docket No. E002,E015,E017/CI-24-288

I. INTRODUCTION

The Minnesota Public Utilities Commission (Commission) will consider the first distributed energy resource (DER) reactive cost share framework. The cost share framework results from the passage of Laws of Minn. 2024, ch. 126, art. 4, sec. 53,¹ which requires the Commission to establish generic standards designed to accelerate the adoption of DER by sharing distribution upgrade costs amongst a pool of DER developers instead of a single cost causer that pays for the benefits received by subsequent interconnections.

The Distribution System Reactive Upgrade Process (DSRUP) was developed by a stakeholder process led by the Commission, and outlines the rules by which reactive DER cost sharing will take place. The majority of the DSRUP was developed under a consensus process, however there are still several areas where consensus requirements were not reached, and require the Commission's decision.

The Department developed the majority of its positions with the Office of the Attorney General – Residential Utilities Division (OAG-RUD) and is aligned with OAG-RUD on the majority of issues.

The Department submits its reply comments to further align its positions with OAG-RUD.

II. PROCEDURAL BACKGROUND

May 4, 2024	Laws of Minn. 2024, ch. 126, art. 4, sec. 53 is passed.
August 30, 2024	Commission opens the current proceeding as required by law. ²
September 26, 2024	Commission invites stakeholders to join the DER Cost Sharing Workgroup to write the DSRUP. ³
September 26, 2025	Commission issues its Notice of Comment Period. ⁴
November 7, 2025	Department Submits its Initial Comments. ⁵

¹ [Laws of Minn. 2024, ch. 126, art. 4, sec. 53](#)

² *In the Matter of a Commission Inquiry into a Framework for Proactive Distribution Grid Upgrades and Cost Allocation for Xcel Energy*, Notice of Docket Opening, August 30, 2024, Docket No. E002,E015,E017/CI-24-288, (eDockets) [20248-209885-01](#).

³ *Notice Soliciting Stakeholder Members*, September 26, 2024, Docket No. E002,E015,E017/CI-24-288, (eDockets) [20249-210501-01](#).

⁴ *Notice of Comment Period*, September 26, 2025, Docket No. E002,E015,E017/CI-24-288, (eDockets), [20259-223328-01](#), (hereinafter "Notice").

⁵ Minnesota Department of Commerce, Initial Comments, November 7, 2025, Docket No. E002,E015,E017/CI-24-288, (eDockets) [202511-224768-01](#), (hereinafter "Department Initial Comments").

Topic(s) open for comment:

- Notice Topic 1: What draft generic standards, outlined in Attachment A and Attachment B should the Commission adopt for the DSRUP? Please provide a rationale for why you support, oppose, or take no position on contested sections of the Standards.
 - A word document of the draft standards is available upon request
 - Staff requests commenters provide a list of all sections their organization supports, opposes, or takes no position on in their comments
 - If there are modifications to sections, please include a redline of changed language
- Notice Topic 2: Do the draft standards address and accomplish the goals and requirements described in the Minnesota Session Laws - 2024, Regular Session, CHAPTER 126—S.F.No. 4292, Article 6, Section 53?
- Notice Topic 3: Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

A. *WHAT DRAFT GENERIC STANDARDS, OUTLINED IN ATTACHMENT A AND ATTACHMENT B SHOULD THE COMMISSION ADOPT FOR THE DSRUP? PLEASE PROVIDE A RATIONALE FOR WHY YOU SUPPORT, OPPOSE, OR TAKE NO POSITION ON CONTESTED SECTIONS OF THE STANDARDS.*

A.1. *Section G. Upgrade Prioritization*

Section F. of the DSRUP covers the process by which projects are prioritized if there are more projects than available funding. There are no subsections that require a Commission decision in this section.

In its Initial Comments, the Department did not take a position on any items this section.⁶ The Department changes its position to align with OAG-DER, specifically in reference to subsection G.5, which states:

Approval through the prioritization process chosen in Section G shall create a rebuttable presumption of prudence in any cost recovery proceeding.⁷

In its Initial Comments, OAG RUD states:

The OAG opposes Item G.5 as written because of the lack of clarity regarding the utility's statutory burden of proof and ongoing duty of prudence. The OAG therefore strongly recommends amending Item G.5 to make clear that utilities have an ongoing burden to demonstrate prudence

⁶ *Id.*, at 11.

⁷ Notice Attachment A at 8.

for the construction of approved upgrades. The OAG proposes the following redline:

OAG G.5: Approval Selection through the prioritization process chosen in Section G shall create a rebuttable presumption ~~of prudence~~ **that pursuing construction of an approved Upgrade was prudent** in any cost recovery proceeding. **The utility retains the burden of proof.**

The original Item G.5 poses a risk of undermining the Commission's oversight authority and enabling imprudent actions after an upgrade has been mobilized, and risks obfuscating the utility's burden of proof. Simply stating there is a "rebuttable presumption of prudence in any cost recovery proceeding" is ambiguous, and a utility is likely to argue that the presumption applies to everything that occurs with the upgrade after it has gone through the prioritization process. The OAG does not believe this was the intention of the draft language, and this would effectively remove the Commission's ability to ensure that upgrades remain prudent through the end of construction because of the asymmetry of information.⁸ [Citations Omitted]

The Department supports the OAG's justification and modification of subsection G.5. The Department also seeks to clarify that a rebuttable presumption of prudence would leave little opportunity to scrutinize utility decisions regarding upgrade capacity selected. In alignment with OAG-RUD, the Department does not dispute the prudence of upgrade decisions themselves, but rather seeks to create an incentive for utilities to select the proper amount of capacity created. In practical terms, the Department and OAG-RUD will not review the engineering prudence of a utility's decisions, but will rather focus on the duration for which carrying costs are accrued and the proportion of the Annual Ratepayer Cost Cap that is recovered in rates.

There are two risks that the Department seeks to mitigate. The first risk is when a utility either overbuilds capacity or builds capacity that is too expensive for Reactive Cost Share Participants to pay for. The key factor in this example is the project scope, as discussed by the Department in its Initial Comments.⁹ If the prudence determination is made before mobilization, then the utility is free to scope a more expensive project than necessary or to build more capacity than can reasonably be expected to be subscribed. So long as the Mobilization Threshold is met, the project is on its face prudent, because the market is willing to pay for the upgrade costs. In this scenario, there would be limited ability for intervenors to challenge these decisions, which would likely be paid for by ratepayers. The second risk is when a utility underbuilds capacity when it knows that subsequent upgrades will be required. This risk is borne by Reactive Cost Share Participants, and unnecessarily inflates their costs.

⁸ Office of the Attorney General – Residential Utilities Division, Initial Comments, November 7, 2025, Docket No. E002,E015,E017/CI-24-288, (eDockets) [202511-224775-01](#), at 15-16.

⁹ Department Initial Comments at 2-5.

These two examples highlight the difficult process of upgrade decisions, for which the utilities deserve deference. However, given that utilities have an incentive to build excess capacity, which they would then be able to recover the remaining capital costs in rate base or riders and the related the carrying costs, there should be a review process to ensure that utilities make their best attempt to build capacity that is used and useful.

The Department recommends the Commission adopt OAG G.5.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the DSRUP and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheading of Section III above. All of the Department's recommendations are summarized below.

A. *WHAT DRAFT GENERIC STANDARDS, OUTLINED IN ATTACHMENT A AND ATTACHMENT B SHOULD THE COMMISSION ADOPT FOR THE DSRUP? PLEASE PROVIDE A RATIONALE FOR WHY YOU SUPPORT, OPPOSE, OR TAKE NO POSITION ON CONTESTED SECTIONS OF THE STANDARDS.*

- A.1. The Department recommends the Commission adopt C.2.a, F.1.b, OAG G.5, H.4, I.1.b, I.2.a, I.2.b, J.1, K.1., K.3.b, K.5.a., K.5.b, K.6.b, L.2 and L.3.

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce
Comments

Docket No. E002, E015, E017/CI-24-288

Dated this 19th day of **November 2025**

/s/Sharon Ferguson

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18	Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	24-288Official 24-288
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108	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	24-288Official 24-288
109	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	24-288Official 24-288
110	Reuben	Hunter	bhunter@madisonai.com	Madison Energy Investments		8100 Boone Blvd Suite 430 Vienna VA, 22182 United States	Electronic Service		No	24-288Official 24-288
111	Casey	Jacobson	cjacobson@bepec.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	24-288Official 24-288
112	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	24-288Official 24-288
113	Robert	Jagus	rjagus@mmua.org	MMUA		3025 Harbor Lane N Minneapolis MN, 55447 United States	Electronic Service		No	24-288Official 24-288
114	Chris	Jarosch	chris@carrcreekelectricservice.com	Carr Creek Electric Service, LLC		209 Sommers Street North Hudson WI, 54016 United States	Electronic Service		No	24-288Official 24-288
115	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
116	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
117	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
118	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	24-288Official 24-288
119	Philip	Jones	phil@evtransportationalliance.org			1402 Third Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	24-288Official 24-288
120	Julie	Jorgensen	julie@greenmark.us.com	Greenmark Solar		4630 Quebec Ave N New Hope MN, 55428-4973 United States	Electronic Service		No	24-288Official 24-288
121	Kevin	Joyce	kjoyce@tesla.com			null null, null United States	Electronic Service		No	24-288Official 24-288
122	Mahmoud	Kabalan	mahmoud.kabalan@stthomas.edu	University of St Thomas		2115 Summit Ave. Mail OSS100 School of Engineering Saint Paul MN, 55105 United States	Electronic Service		No	24-288Official 24-288
123	Camille	Kadoch	ckadoch@raponline.org	Regulatory Assistance Project		50 State Street Suite 3 Montpelier VT, 05602 United States	Electronic Service		No	24-288Official 24-288
124	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	24-288Official 24-288
125	Ralph	Kaehler	ralph.kaehler@gmail.com			13700 Co. Rd. 9 Eyota MN, 55934 United States	Electronic Service		No	24-288Official 24-288
126	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	24-288Official 24-288
127	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	24-288Official 24-288
128	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	24-288Official 24-288
129	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	24-288Official 24-288
130	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven,		150 S 5th St Ste 700	Electronic Service		No	24-288Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Chartered		Minneapolis MN, 55402 United States				24-288
131	Tom	Key	tkey@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	24-288Official 24-288
132	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	24-288Official 24-288
133	Jack	Kluempke	jack.kluempke@state.mn.us		Department of Commerce	85 7th Place East Suite 600 St. Paul MN, 55101 United States	Electronic Service		No	24-288Official 24-288
134	Aaron	Knoll	aknoll@greeneespel.com	Greene Espel PLLP		222 South Ninth Street Suite 2200 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
135	Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power		1725 US Hwy 12 E Litchfield MN, 55355 United States	Electronic Service		No	24-288Official 24-288
136	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	24-288Official 24-288
137	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	24-288Official 24-288
138	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
139	Corrina	Kumpe	ckumpe@mysunshare.com			null null, null United States	Electronic Service		No	24-288Official 24-288
140	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-288Official 24-288
141	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
142	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	24-288Official 24-288
143	Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar		3209 W. 76th St #305 Edina MN, 55435 United States	Electronic Service		No	24-288Official 24-288
144	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
145	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	24-288Official 24-288
146	Benjamin	Levine	blevine@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-288Official 24-288
147	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	24-288Official 24-288
148	Carl	Linville	clinville@raponline.org			50 State Street Suite #3 Montpelier VT, 05602 United States	Electronic Service		No	24-288Official 24-288
149	Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products		PO Box 108 Springfield MN, 56087 United States	Electronic Service		No	24-288Official 24-288
150	Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy		414 Nicillet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	24-288Official 24-288
151	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-288Official 24-288
152	Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.		PO Box 1156 Latham NY, 12110-1156 United States	Electronic Service		No	24-288Official 24-288
153	Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.		10710 Town Square Dr NE Ste 201 Minneapolis MN, 55449 United States	Electronic Service		No	24-288Official 24-288
154	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	24-288Official 24-288
155	Alex	Magerko	amagerko@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	24-288Official 24-288
156	Kavita	Maini	kmainsi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-288Official 24-288
157	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	24-288Official 24-288
158	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
159	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	24-288Official 24-288
160	Jason	Maur	jason.maur@renesolapower.com	Renesola Power Holdings, LLC		850 Canal Street 3rd Floor Stamford CT, 06902 United States	Electronic Service		No	24-288Official 24-288
161	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	24-288Official 24-288
162	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	24-288Official 24-288
163	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	24-288Official 24-288
164	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service		No	24-288Official 24-288
165	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	24-288Official 24-288
166	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	24-288Official 24-288
167	Michael	Menzel	mike.m@sagiliti.com	Sagiliti		23505 Smithtown Rd. Suite 280 Excelsior MN, 55331 United States	Electronic Service		No	24-288Official 24-288
168	Tim	Mergen	tmergen@meeker.coop	Meeker Cooperative Light And Power		1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield MN, 55355 United States	Electronic Service		No	24-288Official 24-288
169	Pontius	Mike	mpontius@mnpower.com			null null, null United States	Electronic Service		No	24-288Official 24-288
170	Brian	Millberg	fwengineering@comcast.net			695 Grand Ave #222 Saint Paul MN, 55105 United States	Electronic Service		No	24-288Official 24-288
171	Luther	Miller	luther.c.miller@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	24-288Official 24-288
172	Marc	Miller	mmiller@soltage.com	Soltage, LLC		66 York Street, 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	24-288Official 24-288
173	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55415 United States				
174	Marcus	Mills	marcus@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	24-288Official 24-288
175	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	24-288Official 24-288
176	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24-288Official 24-288
177	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	24-288Official 24-288
178	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
179	Susan	Mudd	smudd@elpc.org	Environmental Law and Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	24-288Official 24-288
180	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	24-288Official 24-288
181	Alex	Nelson	anelson@dakotaelectric.com	Dakota Electric Association		4300 220nd St Farmington MN, 55024 United States	Electronic Service		No	24-288Official 24-288
182	Anthony	Nelson	amnelson@otpc.com	Ottertail Power		53233 Sunrise Ln Park Rapids MN, 56470 United States	Electronic Service		No	24-288Official 24-288
183	Ben	Nelson	benn@cmpasgroup.org	CMPMA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	24-288Official 24-288
184	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-288Official 24-288
185	Darin	Nelson	dnelson@minnetonkamn.gov	City of Minnetonka		14600 Minnetonka Blvd Minnetonka MN, 55345 United States	Electronic Service		No	24-288Official 24-288
186	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
187	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	24-288Official 24-288
188	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
202	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	24-288Official 24-288
203	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	24-288Official 24-288
204	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	24-288Official 24-288
205	Susan	Peirce	susan.peirce@state.mn.us		Department of Commerce	85 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	24-288Official 24-288
206	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	24-288Official 24-288
207	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-288Official 24-288
208	Wess	Pfaff	wes.pfaff@mrenergy.com			null null, null United States	Electronic Service		No	24-288Official 24-288
209	Morgan	Pitz	morgan.pitz@us-solar.com	US Solar		100 N 6th St #410B Minneapolis MN, 55403 United States	Electronic Service		No	24-288Official 24-288
210	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	24-288Official 24-288
211	Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel		null null, null United States	Electronic Service		No	24-288Official 24-288
212	Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now		null null, null United States	Electronic Service		No	24-288Official 24-288
213	Paula	Prahl	paula.prahl@dominiuminc.com	Dominium		2905 Northwest Blvd Ste 150 Plymouth MN, 55441 United States	Electronic Service		No	24-288Official 24-288
214	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-288Official 24-288
215	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	24-288Official 24-288
216	Elizabeth	Psihos	elizabeth.psihos@idealenergies.com			null null, null United States	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
217	Bridget	Rathsack	bridget.rathsack@burnsvillemn.gov	City of Burnsville, MN		100 Civic Center Parkway Burnsville MN, 55337 United States	Electronic Service		No	24-288Official 24-288
218	Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC		3363 Republic Ave Saint Louis Park MN, 55426 United States	Electronic Service		No	24-288Official 24-288
219	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-288Official 24-288
220	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	24-288Official 24-288
221	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-288Official 24-288
222	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	24-288Official 24-288
223	Micah	Revell	micah.revell@stinson.com	Stinson LLP		50 South Sixth St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
224	Michael	Riewer	mriewer@otpc.com	Otter Tail Power Company		PO Box 4496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	24-288Official 24-288
225	Jonathan	Roberts	jroberts@soltage.com	Soltage		66 York St 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	24-288Official 24-288
226	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	24-288Official 24-288
227	Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC		1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	24-288Official 24-288
228	Daniel	Rogers	dan@nokomispartners.com			2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	24-288Official 24-288
229	Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	24-288Official 24-288
230	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	24-288Official 24-288
231	Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electrical Association		PO Box 529 24386 State Highway 4	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Sleepy Eye MN, 56085 United States				
232	Delaney	Russell	delaney@mnipl.org	Just Solar Coalition		4407 E Lake Street Minneapolis MN, 55407 United States	Electronic Service		No	24-288Official 24-288
233	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	24-288Official 24-288
234	Ian	SantosMeeker	ians@ips-solar.com	IPS Solar		null null, null United States	Electronic Service		No	24-288Official 24-288
235	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
236	Kenric	Scheevel	kjs@dairynet.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602 United States	Electronic Service		No	24-288Official 24-288
237	Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	24-288Official 24-288
238	Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	24-288Official 24-288
239	Jeff	Schoenecker	jschoenecker@dakotaelectric.com	Dakota Electric Association		4300 220th Street W Farmington MN, 55024 United States	Electronic Service		No	24-288Official 24-288
240	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	24-288Official 24-288
241	Matthew	Schuerger	matthew.schuerger@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	24-288Official 24-288
242	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-288Official 24-288
243	Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	24-288Official 24-288
244	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	24-288Official 24-288
245	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	24-288Official 24-288
246	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
247	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	24-288Official 24-288
248	Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC		233 Park Ave S Ste 201 Minneapolis MN, 55415 United States	Electronic Service		No	24-288Official 24-288
249	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	24-288Official 24-288
250	Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power		1725 US Highway 12 E Suite 100 Litchfield MN, 55355 United States	Electronic Service		No	24-288Official 24-288
251	Glen	Skarbakka	glen@s-pllc.com	Skarbakka PLLC		5411 Bartlett Blvd Mound MN, 55364 United States	Electronic Service		No	24-288Official 24-288
252	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	24-288Official 24-288
253	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	24-288Official 24-288
254	Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	24-288Official 24-288
255	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-288Official 24-288
256	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
257	Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy		800 LaSalle Avenue P.O. Box 59038 Minneapolis MN, 55459-0038 United States	Electronic Service		No	24-288Official 24-288
258	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-288Official 24-288
259	Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Association		24386 State Hwy. 4, PO Box 529 Sleepy Eye MN, 56085 United States	Electronic Service		No	24-288Official 24-288
260	Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies		5810 Nicollet Ave Minneapolis MN, 55419 United States	Electronic Service		No	24-288Official 24-288

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
261	Karl	Sonneman	karl17@hbc.com	Law Office of Karl W. Sonneman		111 Riverfront Suite 202 Winona MN, 55987 United States	Electronic Service		No	24-288Official 24-288
262	Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy		401 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	24-288Official 24-288
263	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	24-288Official 24-288
264	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 United States	Electronic Service		No	24-288Official 24-288
265	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
266	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
267	Lindsey	Stegall	lindsey.stegall@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	24-288Official 24-288
268	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-288Official 24-288
269	Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric		22636 US Highway 59 PO Box 788 Worthington MN, 56187 United States	Electronic Service		No	24-288Official 24-288
270	Bryant	Tauer	btauer@whe.org	Wright-Hennepin		6800 Electric Dr Rockford MN, 55373 United States	Electronic Service		No	24-288Official 24-288
271	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	24-288Official 24-288
272	Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light		null null, null United States	Electronic Service		No	24-288Official 24-288
273	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	24-288Official 24-288
274	Taige	Tople	taige.d.tople@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-288Official 24-288

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275	Jason	Topp	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288
276	Emma Marshall	Torres	emarshall-torres@convergentep.com			null null, null United States	Electronic Service		No	24-288Official 24-288
277	Zack	Townsend	zachary.townsend@brookfieldrenewable.com	Brookfield Renewable		200 Liberty St FL 14 New York NY, 10281 United States	Electronic Service		No	24-288Official 24-288
278	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	24-288Official 24-288
279	Jeff	Triplett	triplettj@powersystem.org	MREA		10710 Town Square Dr NW St 201 Minneapolis MN, 55449 United States	Electronic Service		No	24-288Official 24-288
280	Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric		22636 US Hwy. 59 P.O. Box 788 Worthington MN, 56187-0788 United States	Electronic Service		No	24-288Official 24-288
281	Lise	Trudeau	lise.trudeau@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	24-288Official 24-288
282	Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	24-288Official 24-288
283	Gary	Van Winkle	gvanwinkle@mylegalaid.org	Mid-Minnesota Legal Aid		111 N Fifth St Ste 100 Minneapolis MN, 55403 United States	Electronic Service		No	24-288Official 24-288
284	John	Vaughn	nik@rreal.org	Rural Renewable Energy Alliance		3963 8th Street SW Backus MN, 55435 United States	Electronic Service		No	24-288Official 24-288
285	Ellen	Veazey	lveazey@solarunitedneighbors.org	Solar United Neighbors		1350 Connecticut Ave NW Ste 412 Washington DC, 20036 United States	Electronic Service		No	24-288Official 24-288
286	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	24-288Official 24-288
287	Curt	Volkman	curt@newenergy-advisors.com	Fresh Energy		408 St Peter St Saint Paul MN, 55102 United States	Electronic Service		No	24-288Official 24-288
288	Wendy	Vorasane	wendy.vorasane@idealenergies.com			null null, null United States	Electronic Service		No	24-288Official 24-288
289	Robert J.V.	Vose	rvose@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-288Official 24-288

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290	Stacy	Wahlund	swahlund@otpc.com	Otter Tail Power Company		215 S. Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	24-288Official 24-288
291	Sarah	Walinga	swalinga@solarcity.com	Energy Freedom Coalition		3055 Clearview Way San Mateo MN, 94402 United States	Electronic Service		No	24-288Official 24-288
292	Kevin	Walker	kwalker@beaconinterfaith.org	Beacon Interfaith Housing Collaborative		null null, null United States	Electronic Service		No	24-288Official 24-288
293	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	24-288Official 24-288
294	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	24-288Official 24-288
295	Samantha	Weaver	samantha@communitysolaraccess.org	Coalition for Community Solar Access		1380 Monroe St. Washington DC DC, 20010 United States	Electronic Service		No	24-288Official 24-288
296	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	24-288Official 24-288
297	Joshua	Williams	joshua@highlandfleets.com	Highland Electric Fleets		200 Cummings Center Suite 273-D Beverly MA, 01915 United States	Electronic Service		No	24-288Official 24-288
298	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	24-288Official 24-288
299	John	Williamson	john.williamson@state.mn.us	Minnesota Department of Labor and Industry		443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	24-288Official 24-288
300	Anthony	Willingham	anthony.willingham@electrifyamerica.com	Electrify America		1950 Opportunity Way Suite 1500 Reston VA, 20190 United States	Electronic Service		No	24-288Official 24-288
301	Danielle	Winner	danielle.winner@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	24-288Official 24-288
302	Heidi	Winter	hwinter@co.murray.mn.us	Murray County		2500 28th Street PO Box 57 Slayton MN, 56172 United States	Electronic Service		No	24-288Official 24-288
303	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids	Electronic Service		No	24-288Official 24-288

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304	Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box Sioux Falls SD, 57109-8920 United States	Electronic Service		No	24-288Official 24-288
305	Curtis	Zaun	curtis@cpzlaw.com			3254 Rice Street Little Canada MN, 55126 United States	Electronic Service		No	24-288Official 24-288
306	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-8920 United States	Electronic Service		No	24-288Official 24-288
307	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188-1022 United States	Electronic Service		No	24-288Official 24-288
308	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-288Official 24-288
309	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	24-288Official 24-288