

September 30, 2013

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, Minnesota 55101

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources  
Docket No. E002/M-13-642

Dear Dr. Haar,

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Xcel Energy's request for approval of modifications implementing Net Metered Facility Provisions, Standby Service Exemptions, and Meter Aggregation pursuant to the 2013 Omnibus Energy Bill.

The petition was filed on July 31, 2013. The petitioner is:

Amy Liberkowski  
Manager, Regulatory Analysis  
414 Nicollet Mall  
Minneapolis, Minnesota 55401

The Department recommends **approval, with modifications**. In addition, the Department recommends that the Commission open a proceeding to review the appropriateness and application of standby charges and to determine ownership of renewable energy credits in cases of non-solar-powered generation at net metered facilities. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE  
Rate Analyst

SLP/sm  
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES

DOCKET NO. E002/M-13-642

**I. BACKGROUND INFORMATION**

The 2013 Legislative session resulted in a number of changes and amendments to Minnesota Statutes affecting distributed generation, net metering and the provision of standby service. Changes include:

- Increasing the size limit of net metering for facilities from up to 40 kW to up to 1,000 kW with a kWh credit that may be carried forward over a calendar year (Minn. Stat. §216B.164 Subd. 3a).
- Allowing customers with multiple meters on contiguous property to aggregate their billing for the purpose of applying net metered credits. (Minn. Stat. 216B.164, Subd.
- Adding a provision that a customer with a net metered facility between 40 kW and less than 1,000 kW capacity may elect to be compensated for any net input into the system in the form of a kilowatt-hour credit (kWh) carried forward and applied to subsequent energy bills.
- Prohibiting the imposition of a standby charge on a net metered or qualifying facility of 100 kW capacity or less, and of more than 100 kW except in accordance with a Commission Order establishing the allowable costs to be recovered through standby charges. (Minn. Stat. §216B.164 Subd. 3b)

On July 31, 2013, Xcel Energy (Xcel or the Company) filed a petition requesting approval of tariff modifications to implement various provisions of the 2013 Omnibus Energy Bill. Specifically, Xcel requested approval of changes to its Net Metered Facility Provisions, Standby Service Tariff, and Meter Aggregation.

## **II. DEPARTMENT ANALYSIS**

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed Xcel's proposed tariff changes and offers the following comments on each tariff. The Department notes that the Commission is in the preliminary stages of a rulemaking to amend the rules governing cogeneration and small power production contained in Minnesota Rules Chapter 7835 to comply with the statutory changes to Minn. Stat. §216B.164. (Docket No. E999/R-13-729). To the extent rules are amended in the course of that proceeding, Xcel's tariff proposal may require further amendment to comply with the rules.

### **A. *STANDBY SERVICE TARIFF***

Xcel proposed to update its Standby Tariff to reflect the change to Minn. Stat. §216B.164, Subd. 3b changing the application of standby charges from facilities over 60 kW to those with over 100 kW capacity. Minn. Stat. §216B.164, Subd. 2a(c) defines capacity as "the number of megawatts alternating current (AC) [sic] at the point of interconnection between a distributed generation facility and a utility's electric system." The Department recommends that Xcel's Standby Service Tariff be clarified to reflect that the tariff applies to facilities with over 100 kW alternating current (AC) capacity as measured at the point of interconnection between a distributed generation facility and a utility's electric system.

The Department does not object to Xcel's proposal to increase the facility size subject to standby charges; however, the statute requires "an order of the Commission establishing allowable costs to be recovered through standby charges" before the utility may impose a standby charge on a net metered or qualifying facility more than 100 kW.

Thus, the recent amendment to the statute appears to contemplate a Commission proceeding to evaluate the appropriateness of existing standby charges. Consequently, the Department recommends that the Commission open a generic docket to address the statutory requirement for a Commission Order before a utility may impose standby charges on facilities over 100 kW. Alternatively, since Xcel will file a rate case soon, the Commission could examine the question specifically for Xcel in the Company's rate case while examining the questions for other utilities in a generic proceeding, whichever approach the Commission determines would be a more efficient use of resources. An advantage of a generic proceeding would be that it could address the methodology for determining standby rates, the appropriateness of existing charges and how those rates are applied for each utility.

### **B. *NET ENERGY BILLING SERVICE***

Net Energy Billing Service applies to small qualifying facilities of less than 40 kW capacity. As with the Standby Service Tariff, the Department recommends that Xcel's Net Energy Billing Service be clarified to reflect that the tariff applies to facilities with less than 40 kW alternating current (AC) capacity in order to comply with Minn. Stat. §216B.164 Subd. 2a(c).

Minn. Stat. §216B.164, Subd. 4a requires a public utility to aggregate a customer's designated meter with other customer-owned meters if the meters are located on contiguous customer-owned property. Minn. Stat. §216B.164, Subd. 4a also requires that a public utility must:

Comply with a request by a customer-generator to aggregate additional meters within 90 days. The specific meters must be identified at the time of the request. In the event that more than one meter is identified, the customer must designate the rank order for the aggregated meters to which the net metered credits are to be applied. At least 60 days prior to the beginning of the next annual billing period, a customer may amend the rank order of the aggregated meters, subject to this subdivision.

(c) The aggregation of meters applies to charges that use kilowatt-hours as the billing determinant. All other charges applicable to each meter account shall be billed to the customer.

(d) A public utility will first apply the kilowatt-hour credit to the charges for the designated meter and then to the charges for the aggregated meters in the rank order specified by the customer. If the net metered facility supplies more electricity to the public utility than the energy usage recorded by the customer-generator's designated and aggregated meters during a monthly billing period, the public utility shall apply credits to the customer's next monthly bill for the excess kilowatt-hours.

Xcel proposed to add language to its Net Energy Billing Service Tariff that permits a customer to aggregate its designated meter with one or more meters if on contiguous property, and to provide the appropriate credits if the energy supplied by the customer exceeds its energy usage at the designated and aggregated meters. Xcel's proposed tariff does not contain any language indicating that it must comply with a customer request to aggregate additional meters within 90 days of such a request, and to permit a customer to amend the rank order of the aggregated meters at least 60 days prior to the beginning of the next annual billing period.

In response to a Department information request (DOC IR No. 3 – Attachment A), the Company stated that the statutory timeframes for customer requests was reflected in its Contract for Net-Metered Facilities. However, the Department understands the Contract to apply only to facilities rated between 40 and 1,000 kW, whereas, the Net Energy Billing Service Tariff applies to

customers with facilities of less than 40 kW. Consequently, the Department recommends that the Commission require Xcel to revise its Net Energy Billing Service Tariff to include reference to the statutory timeframes required by Minn. Stat. §216B.164, Subd. 4a.

*C. DISTRIBUTED GENERATION STANDARD INTERCONNECTION AND POWER PURCHASE TARIFF*

*1. Meter Aggregation*

As with the Net Energy Billing Tariff, Xcel did not include reference to the statutory requirement that it respond to a customer request to add additional meters to the meter aggregation within 90 days, and to allow a customer to change the rank order for the application of energy to the meter aggregation at least 60 days prior to the next annual billing period. The Department recommends that the Commission require Xcel to revise its Distributed Generation Standard Interconnection and Power Purchase Tariff to include these two provisions.

*2. System Limits*

Minn. Stat. §216B.164, Subd 4c(a) allows a public utility to limit the total generation capacity of individual distributed generation systems by either:

- (1) for wind generation systems, limiting the total generation system capacity kilowatt alternating current to 120 percent of the customer's on-site maximum electric demand; or
- (2) for solar photovoltaic and other distributed generation limiting the total generation system annual energy production kilowatt hours alternating current to 120 percent of the customer's on-site electric energy consumption.

The statute further provides that:

- (b) Limits under paragraph (a) must be based on standard 15-minute intervals measured during the previous 12 calendar months, or on a reasonable estimate of the average monthly maximum demand or average annual consumption if the customer has either:
  - (i) less than 12 calendar months of actual electric usage; or
  - (ii) no demand metering available.

Xcel's proposed tariff language largely mirrors that of the statute. Nonetheless, the Department notes that the phrase "a reasonable estimate of the average monthly maximum demand or average annual consumption" is vague, and should be more clearly defined in the tariff.

In response to Department IR No. 5, the Company provided information regarding the processes it is considering adopting to establish system capacity limit compliance. In the event that at least five months usage data is available, the Company proposed that it would annualize the consumption data. In the event that less than five months of data is available, Xcel provided a more detailed calculation through which it would make an estimate. (DOC IR No. 5 – Attachment B) The Department recommends that the Commission address the process for estimating consumption data where existing information is not available as part of its Distributed Generation rulemaking in Docket No. E999/R-13-729.

### 3. *Renewable Energy Certificates (RECs)*

Under Xcel's proposed tariff, "[a]ll renewable energy credits (RECs) associated with the energy produced by the Net-Metered Facility shall be assigned to the Company." Minn. Stat. §216B.164, Subd. 10(i), specifically requires RECs for solar energy generation receiving the Value of Solar credit to be credited to the Company; however the statute is silent regarding the treatment of RECs from distributed generation facilities not using the Value of Solar tariff.

In response to a Department IR No. 6, the Company acknowledged that "the Net Metered Facility statute does not directly address who should get the RECs produced by net-metered facilities." Xcel argued that the statutory treatment of solar RECs should guide the treatment of RECs from non-solar, net-metered facilities. While the Department generally favors awarding the RECs to the Company for the benefit of all ratepayers, the statute is silent on how RECs from non-solar, net-metered facilities should be treated. Consequently, the Department recommends that the Commission direct Xcel to remove the requirement that all RECs from net-metered facilities not receiving credit under the Value of Solar tariff be awarded to the Company since the change is not required by statute. The Department suggests that this topic could be addressed in the Commission's rulemaking proceeding in Docket No. E999/R-13-729.

### **D. CONTRACT FOR NET METERED FACILITIES**

In its Contract for Net-Metered Facilities, Xcel proposed to require that a customer have two Company-owned meters installed at each service location. According to the contract language, "one meter is located at the main service and is a bi-directional meter that will record energy delivered to the Customer from the Company, and energy received by the Company from Customer...The second (Production) meter will record energy generated by the net-metered facility system only."

The Department believes the second Production meter would only be necessary to measure generation for the purpose of registering the RECs associated with the DG facility. While the Company indicated it will install, own, operate and maintain the Production meter at the Company's expense, including the cost of the meter itself, the need for the second meter only exists if the RECs are awarded to the Company. As indicated above, the statute is silent on REC ownership from facilities other than solar installations under the Value of Solar Tariff. Consequently, the Department recommends that the Commission order Xcel to remove the requirement for two meters.

### **III. DEPARTMENT RECOMMENDATIONS**

The Department recommends the following modifications to Xcel's proposed tariff:

#### Standby Service Tariff

- Amend the tariff to reflect that it applies to facilities with more than 100 kW alternating current (AC) capacity.

### Net Energy Billing

- Amend the tariff to reflect that it applies to facilities with less than 40 kW alternating current (AC) capacity.
- Add language stating that it will comply with a customer request to aggregate additional meters within 90 days of such a request, and to permit a customer to amend the rank order of the aggregated meters at least 60 days prior to the beginning of the next annual billing period.

### Distributed Generation Standard Interconnection and Power Purchase Tariff

- Add language stating that it will comply with a customer request to aggregate additional meters within 90 days of such a request, and to permit a customer to amend the rank order of the aggregated meters at least 60 days prior to the beginning of the next annual billing period.
- Add language clearly indicating how Xcel will calculate, when necessary, a reasonable estimate of the average monthly maximum demand or average annual consumption
- Remove the requirement that all RECs from non-solar, net-metered facilities be awarded to the Company.

### Contract for Net-Metered Facilities

- Remove the requirement for a second Production meter.

In addition to the recommended tariff changes, the Department recommends that the Commission open a generic proceeding to review the appropriateness and application of standby charges and to determine REC ownership in cases of non-solar, net metered facilities.

/sm

# Attachment A

- Non Public Document – Contains Trade Secret Data  
 Public Document – Trade Secret Data Excised  
 Public Document

Xcel Energy

Docket No.: E002/M-13-642

Response To: Department of Commerce Information Request No. 003

Requestor: Susan L. Peirce

Date Received: August 9, 2013

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Question:

Re: Net Energy Billing Service Tariff; Distributed Generation Standard Interconnection and Power Purchase Tariff; Contract for Net-Metered Facilities

With regard to meter aggregation, Minn. Stat. § 216B.164, subd 4(b) provides that a public utility must comply with a request by a customer-generator to aggregate additional meters within 90 days. With respect to the rank order in which net metered credits are applied, the statute provides that a customer may amend the rank order at least 60 days prior to the beginning of the next annual billing period. Please provide revised tariffs that reflect both of these statutory provisions.

Response:

The Company believes that both of these requirements are set out in its proposed tariffs as submitted by the Company on July 31, 2013. Please see proposed Section 10, Original Sheet No. 165, paragraphs. 7 c and g applicable to meter aggregation which state:

c) At the time of the Customer request for aggregation, the specific meters must be clearly identified, and the Customer must designate the rank ordered for the aggregated meters to which the net metered credits are to be applied. At least 60 days prior to the beginning of the next annual billing period, a Customer may amend the rank order of the aggregated meters, subject to the terms of this Contract; ...

g) The Company will comply with a Customer request to aggregate additional meters within 90 days, provided that such request is otherwise consistent with the terms of this NMF Contract.



# Attachment B

- Non Public Document – Contains Trade Secret Data  
 Public Document – Trade Secret Data Excised  
 Public Document

Xcel Energy

Docket No.: E002/M-13-642

Response To: Department of Commerce Information Request No. 005

Requestor: Susan L. Peirce

Date Received: August 9, 2013

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Question:

Re: Distributed Generation Standard Interconnection and Power Purchase Tariff and Contract for Net-Metered Facilities

According to the proposed tariff, the system limits are based on standard 15-minute intervals, measured during the previous 12 calendar months, or a reasonable estimate of the average monthly maximum demand or average annual consumption if the customer has either (1) less than 12 calendar months of actual electric usage or (2) no demand metering available.

Please provide the basis for determining a “reasonable estimate”. How will disputes regarding the “reasonable estimate” be resolved?

Response:

The language in the tariff closely tracks Minn. Stat. § 216B.164 Subd. 4c(b). To calculate annual usage and 15-minute interval demand the company is considering adopting the following processes to establish system capacity limit compliance for residential, commercial and demand-billed customers:

Five months (or greater) of usage data

If at least five months usage data is available, the Company uses the following formulas: Customer usage data divided by the number of months of usage data multiplied by 12 months. The result is an annualized consumption estimate base on available usage data.

Four months (or fewer) of usage data and demand interval estimation

- Residential Customers (< 5000 Sq ft.)

The company uses a calculation tool that estimates annual consumption based on house size. The company then calculates PV production per kW<sub>DC</sub> based on geographic location based on data available from the NREL PV Watts website. Finally the company divides the annual consumption estimate by PV production per kW<sub>DC</sub> estimate to generate the system size in direct current.

- Residential (> 5000 Sq ft.), Commercial and Demand Billed Customers

The Company requires the installer to provide the proposed solar PV system size, a usage estimate (including estimate work papers) and project detail (plans, use, operating hours, etc.). The following is a more detailed description of the information requirements:

1. Installers are required to provide the proposed system size. This is accomplished by using PVWatts V1 to determine if the proposed system will generate no more than 120% of estimated annual energy usage.
2. Installers are required to provide an estimate of the facilities annual energy usage (kWh) when submitting their initial application.
3. The usage estimate must include energy use calculations showing how the annual usage was calculated (i.e., installer needs to show its calculations). This includes identifying the buildings primary electrical loads by wattage (not circuit breaker amp rating) or horse power, and includes the following categories:
  - a. Lighting (number of fixtures, wattage per fixture)
  - b. Cooling/heating
  - c. Ventilation
  - d. Pumps
  - e. Special equipment (air compressors, refrigeration equipment, etc.)
4. Installer is also required to provide substantiating documentation for the usage estimate:
  - a. Mechanical and Electrical plans for the facility
  - b. Description of facility and end use (ex. Office, retail, warehouse, school)
  - c. Expected operating hours (ex. 8 a.m. to 5 p.m. M-F, 12-12 Sat., closed Sun.)
  - d. Any additional information which can be used to justify the facility's usage estimate, such as usage history from a facility of same size and end use,

5. Alternatively, the installer can provide an Energy Model done for the facility. Such a model can be commonly found for buildings participating in Xcel Energy's Energy Design Assistance (EDA) program. The installer should:
  - a. Include all inputs and outputs from the model
  - b. Provide the project number if facility participated in the EDA program.
6. The solar program team will review the information submitted.
  - a. Engineering support will review usage estimate and associated documentation to ascertain reasonableness
  - b. With engineering approval of the usage, the solar program team will approve/deny system based on requested size (kW) and completeness of application.

The company will make every effort to work the customer to establish a mutually agreed to demand usage or average annual consumption estimate. Should the customer continue to dispute this system size estimate, or dispute industry methods created to produce the sizing requirements, the customer would retain the existing rights to request the commission to resolve the issue via Minn. Rules 7835.4500, 7829.1500, 7829.1700, or such other process as the Commission directs.

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Preparer: Susannah Pedigo  
Title: Manager  
Department: Renewable Energy Products and Services  
Telephone: (303) 294-2353  
Date: August 21, 2013

## **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/M-13-642**

Dated this 30<sup>th</sup> day of September, 2013

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_13-642_M-13-642
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	OFF_SL_13-642_M-13-642
James J.	Bertrand	james.bertrand@leonard.com	Leonard Street & Deinard	150 South Fifth Street, Suite 2300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-642_M-13-642
Michael	Bradley	bradley@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	OFF_SL_13-642_M-13-642
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-642_M-13-642
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_13-642_M-13-642
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	No	OFF_SL_13-642_M-13-642
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_13-642_M-13-642
Lloyd	Grooms	lgrooms@winthrop.com	Winthrop and Weinstine	Suite 3500 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_13-642_M-13-642
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_13-642_M-13-642

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_13-642_M-13-642
Richard	Johnson	johnsonr@moss- barnett.com	Moss & Barnett	4800 Wells Fargo Center90 South Seventh Street  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-642_M-13-642
Mark J.	Kaufman	mkaufman@ibewlocal949.o rg	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Paper Service	No	OFF_SL_13-642_M-13-642
Thomas G.	Koehler	N/A	Local Union #160, IBEW	2909 Anthony Ln  Minneapolis, MN 55418-3238	Paper Service	No	OFF_SL_13-642_M-13-642
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-642_M-13-642
Douglas	Larson	dlarson@dakotaelectric.co m	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_13-642_M-13-642
Amy	Liberkowski	amy.a.liberkowski@xcelen ergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_13-642_M-13-642
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	OFF_SL_13-642_M-13-642
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Paper Service	No	OFF_SL_13-642_M-13-642
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-642_M-13-642

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-642_M-13-642
Joseph V.	Plumbo		Local Union 23, I.B.E.W.	932 Payne Avenue  St. Paul, MN 55130	Paper Service	No	OFF_SL_13-642_M-13-642
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-642_M-13-642
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_13-642_M-13-642
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_13-642_M-13-642
Byron E.	Starns	byron.starns@leonard.com	Leonard Street and Deinard	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-642_M-13-642
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	OFF_SL_13-642_M-13-642
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_13-642_M-13-642
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_13-642_M-13-642
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_13-642_M-13-642