



® **minnesota power** / 30 west superior street / duluth, minnesota 55802-2093 / 218-722-5642 / www.mnpower.com

Lori Hoyum
Policy Manager
218-355-3601
lhoyum@mnpower.com

August 15, 2013

VIA E-FILING

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

Re: In the Matter of the Implementation of
Solar Energy Standards Pursuant to 2013
Amendments to Minnesota Statutes,
Section 216B.1619

Dear Dr. Haar:

The Minnesota Public Utilities Commission (“Commission”) issued a Notice of Request for Filings from Electric Utilities on Customers Excluded from the Solar Energy Standard and Opportunity to Comment on Filings (“Notice”) on July 25, 2013, in the above referenced docket. Minnesota Power respectfully submits its Compliance Report and Comments in response to the Notice. Please note that there are both public and trade secret versions of this filing.

Please contact me at the number provided above with any questions or concerns.

Yours truly,

A handwritten signature in black ink that reads "Lori Hoyum". The signature is fluid and cursive, with the first and last names clearly legible.

Lori Hoyum

Attachment
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Implementation of
Solar Energy Standards Pursuant to 2013
Amendments to Minnesota Statutes,
Section 216B.1619

Docket No. E-999/CI-13-542
**MINNESOTA POWER'S
COMPLIANCE REPORT
AND COMMENTS**

The Minnesota Public Utilities Commission (“Commission”) issued a Notice of Request for Filings from Electric Utilities on Customers Excluded from the Solar Energy Standard and Opportunity to Comment on Filings (“Notice”) on July 25, 2013 (Docket No. E-999/CI-13-542). Minnesota Power respectfully submits its Compliance Report and Comments in response to the Notice.

Through this response Minnesota Power outlines its effort in providing the Company’s Solar Energy Standard exemptions. This initial effort contains values that may evolve over time as the utilities receive clarification and guidance from the Commission regarding the method of calculating the exemptions. Minnesota Power began by calculating the Company’s total retail sales, which amounted to 9.4 million MWh in 2012¹. This Retail sales amount differs from the amount reported in Minnesota Power’s 2012 Renewable Energy Standard (“RES”) compliance filing (E-999/PR-13-186). The retail sales amount of 10,230,183 MWh reported in the RES compliance filing is larger as it includes both Retail and Resale customer sales per the requirements of the RES. Both the Retail and Resale calculations are represented in Table 1 on Page 2.

¹ In response to request Number 1 of the Notice

| | 2012 Retail Sales (kWh) |
|--|------------------------------------|
| Residential | 1,043,281,136 |
| Commercial | 1,237,386,232 |
| Industrial | 7,037,843,297 |
| Lighting | 15,953,810 |
| Pub Auth | 54,073,671 |
| Total Retail | 9,388,538,146 |
| 2012 Minnesota Resale Sales (kWh) | |
| Resale | 841,645,000 |

Table 1: 2012 Retail and Resale Totals

As shown in Table 2 on Page 2, there is potential for 140 to 153 million kWh of required solar energy depending on which customers are ultimately included into the mandate requirements.

| Solar Mandate Based on 2012 Retail Customer Sales (kWh) | |
|---|-------------|
| 1.5 Percent | 140,828,072 |
| 10% of 1.5 Percent | 14,082,807 |
| | |
| Solar Mandate Based on 2012 Retail and Resale Customer Sales (kWh) | |
| 1.5 Percent | 153,452,747 |
| 10% of 1.5 Percent | 15,345,275 |

Table 2: Estimation of Solar Mandate Based on 2012 Retail and Resale Sales

Once excludable sales were identified, the amount was then subtracted from 2012 retail energy sales to obtain total sales subject to the Solar Energy Standard. Table 3 on Page 3 and Table 4 on Page 4 outline the total sales possible for exclusion².

The amounts were obtained by querying the Company’s Customer Information System (“CIS”) database for 2012 Retail sales³ possible for exclusion from the Solar Energy Standard. The Company determined the customer exclusion categorizations through the North American Industry Classification System (“NAICS”) codes within the Company’s CIS database⁴. The NAICS codes utilized by Minnesota Power to identify possible customer exclusions are listed in Table 5 on Page 4.

| | 2012 Retail Sales (kWh) | 2012 Exclusions (kWh) | 2012 Sales After Exclusions (kWh) |
|---------------------|--|----------------------------------|--|
| Residential | 1,043,281,136 | 0 | 1,043,281,136 |
| Commercial | 1,237,386,232 | 4,002,976 | 1,233,383,256 |
| Industrial | 7,037,843,297 | 6,542,061,610 | 495,781,687 |
| Lighting | 15,953,810 | 0 | 15,953,810 |
| Pub Auth | 54,073,671 | 0 | 54,073,671 |
| Total Retail | 9,388,538,146 | 6,546,064,586 | 2,842,473,560 |
| | | | |
| | 2012 Minnesota Resale Sales (kWh) | 2012 Exclusions (kWh) | 2012 Sales After Exclusions (kWh) |
| Resale | 841,645,000 | Unknown | 841,645,000 |

Table 3: Potential Exclusions Based on 2012 Sales (kWh)

² In response to request Number 5 of the Notice

³ In response to request number 2 of the Notice

⁴ In response to request number 4 of the Notice

| Solar Mandate Based on 2012 Retail Customer Sales (kWh) | |
|--|------------|
| 1.5 Percent | 42,637,103 |
| 10% of 1.5 Percent | 4,263,710 |
| | |
| Solar Mandate Based on 2012 Retail and Resale Customer Sales (kWh) | |
| 1.5 Percent | 55,261,778 |
| 10% of 1.5 Percent | 5,526,178 |
| | |

Table 4: 2012 Solar Mandate Requirements after Exclusions

| NAICS Code | NAICS Label |
|------------|---|
| 212210 | Iron Ore Mining |
| 321113 | Sawmills |
| 321114 | Wood Preservation |
| 321211 | Hardwood Veneer and Plywood Manufacturing |
| 321212 | Softwood Veneer and Plywood Manufacturing |
| 321113 | Sawmills |
| 321214 | Truss Manufacturing |
| 321219 | Reconstituted Wood Product Manufacturing |
| 321911 | Wood Window and Door Manufacturing |
| 321912 | Cut Stock, Resawing Lumber, and Planing |
| 321918 | Other Millwork (including Flooring) |
| 321920 | Wood Container and Pallet Manufacturing |
| 321991 | Manufactured Home (Mobile Home) Manufacturing |
| 322121 | Paper (except Newsprint) Mills |
| 322122 | Newsprint Mills |
| 322130 | Paperboard Mills |

Table 5: NAICS Codes Queried

Approximately 6.6 million MWh, representing sales to 60 customers, fit into the categories proposed to be excluded. These potential exclusions represent roughly 70 percent of the Company’s total retail sales in 2012. Sixteen iron mining and paper mill customers make up 99.3 percent of the exclusions as evidenced in Table 6 on Page 5. The customers Minnesota Power ultimately excluded from the Solar Energy Standard calculations under Minn. Stat. § 216B.1691, subd. 2f (d) (1) and (2) can be found in Table 6 on Page 5 and Table 7 on Page 6.⁵

⁵ In response to request number 3 of the Notice

**PUBLIC DOCUMENT
TRADE SECRET DATA EXCISED**

| NAICS Code | NAICS Label | Customer Name | 2012 kWh | Max KW Demand | Revenue Class |
|------------|---|----------------------------------|----------------------------|---------------|---------------|
| 212210 | Iron Ore Mining 11 Customers | Trade Secret Data Excised | | | Industrial |
| | | | | | Industrial |
| | | | | | Industrial |
| | | | | | Industrial |
| | | | | | Industrial |
| | | | | | Industrial |
| | | | | | Industrial |
| | | | | | Commercial |
| | | | | | Industrial |
| 322121 | Paper (except Newsprint) Mills 5 Customers | | | | Industrial |
| | | | | | Industrial |
| | | | | | Industrial |
| | | | | | Industrial |
| | | Iron and Paper kWh | - | | |
| | | 16 Customers | 99.3% of Exclusions | | |

Table 6: 2012 Excludable Sales in Iron or Paper

**PUBLIC DOCUMENT
TRADE SECRET DATA EXCISED**

| NAICS Code | NAICS Label | Customer Name | 2012 kWh | Max KW Demand | Revenue Class |
|------------|--|-----------------------------|---------------------------|---------------|--|
| 321113 | Sawmills 9 Customers | | | | Commercial Commercial Commercial Commercial Industrial Industrial Commercial |
| 321114 | Wood Preservation 2 Customers | | | | Commercial Commercial |
| 321211 | Hardwood Veneer and Plywood Manufacturing 3 Customers | | | | Commercial Commercial Commercial |
| 321214 | Truss Manufacturing | | | | Commercial |
| 321219 | Reconstituted Wood Product Manufacturing 3 Customers | | | | Industrial Industrial Industrial |
| 321911 | Wood Window and Door Manufacturing 2 Customers | | | | Commercial Commercial |
| 321912 | Cut Stock, Resawing Lumber, and Planing 6 Customers | | | | Industrial Commercial Commercial Commercial Commercial Commercial |
| 321918 | Other Millwork (including Flooring) 8 Customers | | | | Industrial Commercial Commercial Commercial Industrial Commercial Industrial Commercial |
| 321920 | Wood Container and Pallet Manufacturing 9 Customers | | | | Industrial Commercial Industrial Industrial Industrial Industrial Industrial Commercial Industrial |
| 321991 | Manufactured Home (Mobile Home) Manufacturing | | | | Commercial |
| | | All Other kWh | - | | |
| | | 44 Customers | 0.7% of Exclusions | | |
| | | Total (60 Customers) | - | | |

Table 7: 2012 Excludable Sales in Wood Products

The Company requests guidance from the Commission on the definition of the term “wood products manufacturer” which is included in the exemption categories under the Solar Energy Standard. Based on Minnesota Power’s initial review, various customers, such as small woodshops and cabinet manufacturers, are able to fit into this description. Whether these types of

facilities are wood products manufacturers is a Commission determination since the Legislature did not provide a definition.

While the NAICS codes⁶ are data points that serve to provide a reasonable proxy for customers that would be excluded, these codes are self-reported by customers and involve a degree of subjectivity. If it is ultimately determined that NAICS codes are the best means for identifying customers for exclusion, an application and/or notification process for customers may be warranted before final determination of exclusions. Given that this would set the Solar Energy Standard level, there is no existing procedural framework for these customer exclusions, and this would be a new purpose for NAICS codes, utilities must be able to verify, with consistency and within reason, that each customer is classified appropriately. Further, a means for addressing new customers and customer reclassifications would likely need to be developed as part of this process.

⁶ NAICS was developed by the Office of Management and Budget to classify units according to their production function. NAICS results in industries that group units undertaking similar activities using similar resources but does not necessarily group all similar products or outputs. Its purposes are: (1) to facilitate the collection, tabulation, presentation, and analysis of data relating to establishments, and (2) to promote uniformity and comparability in the presentation and analysis of statistical data describing the North American economy. (<http://www.census.gov/eos/www/naics/>)

2020 Forecast:

The results of the customer exclusion analysis were extended to the 2020 forecast based on the Moderate Growth Scenario from Minnesota Power’s 2013 Annual Electric Utility Forecast Report, as depicted in Table 8 on Page 8.⁷

The “Commercial total” value was calculated by applying the percentage of “Commercial total” sales excluded in 2012 to the 2020 forecast. The “Industrial total” value was obtained by subtracting the forecast of iron and paper from the total Industrial forecast. This may understate the exclusion since it does not include the “Wood Products” value, which accounted for 0.7 percent of the 2012 excludable sales.

| Projected 2020 Utility Solar Mandate (kWh) | | | |
|---|------------------------------------|------------------------|------------------------------------|
| | 2020 Retail Sales | 2020 Exclusions | 2020 Sales after Exclusions |
| Residential | 1,198,677,770 | 0 | 1,198,677,770 |
| Commercial | 1,456,330,143 | 4,711,265 | 1,451,618,878 |
| Industrial | 7,650,196,086 | 6,659,356,773 | 990,839,313 |
| Lighting | 16,609,976 | 0 | 16,609,976 |
| Pub Auth | 64,875,658 | 0 | 64,875,658 |
| Total Retail | 10,386,689,633 | 6,664,068,038 | 3,722,621,595 |
| | | | |
| | 2020 Minnesota Resale Sales | | |
| Resale | 1,811,525,587 | | 1,811,525,587 |
| | | | |
| Retail Only | | | |
| 1 1/2 Percent | 155,800,344 | | 55,839,324 |
| 10% of 1 1/2 Percent | 15,580,034 | | 5,583,932 |
| | | | |
| Retail and Resale | | | |
| 1 1/2 Percent | 182,973,228 | | 83,012,208 |
| 10% of 1 1/2 Percent | 18,297,323 | | 8,301,221 |

Table 8: 2020 Retail Sales Forecast, Sales after Exclusions, and 2020 Goal

⁷ In response to request number 6 in the Notice

Municipal (Resale) Discussion:

The Solar Energy Standard applies only to “public utilities” and therefore exempts cooperative and municipal utilities. However, as previously ordered by the Commission, Minnesota Power’s wholesale sales to municipal customers count towards the overall renewable energy standard under Minn. Stat. § 216B.1691.⁸ Minnesota Power does not seek to reconsider this prior Commission order, but does seek guidance on whether its wholesale sales to municipal customers should count toward the Solar Energy Standard given the that the Legislature specifically excluded cooperatives and municipal power agencies. With municipal utilities being included in the retail sales, and therefore, eligible to have the Solar Energy Standard costs passed onto them, this creates a competitive advantage for the cooperatives and municipal power agencies (or even public utilities that do not serve retail load in Minnesota). The customers who would be otherwise exempt, if not for being located within the municipal boundaries, will bear the burden of costs not being passed onto a similar customer inside Minnesota Power’s (or any other public utility’s) service territory. The municipality is under contract for electric service and therefore cannot provide any protection to said customer.

If the Commission deems it appropriate to exempt qualified customers within the municipalities’ boundaries, the question then centers on how that exemption would be gained. Given the differences in federal and state ratemaking, the implementation of the cost allocation for such a customer would be a problematic undertaking. The public utility providing electric service to the municipality would somehow need to coordinate not only the exemption from the Company’s retail sales but also the cost allocation to the customer. Furthermore, there are customers within Minnesota Power’s municipal utilities that meet the exempt categories, as discussed above.

⁸ E999/M-10-989 - May 13, 2011 Order Finding Utilities In Compliance And Clarifying Requirements For Reporting Wholesale Electricity Sales

Topics Open for Comment on the Utility Filings:

Have the utilities provided reasonable estimates of their SES obligations?

Minnesota Power applied a reasonable estimate based on available data and understanding of customer operations. As outlined previously, the exemptions represent a bulk of the Company's load due to the nature of the customer base.

Should the Commission establish criteria to be used by utilities in determining customer exclusions, such as kW demand, kWh usage, NAICS codes?

The Solar Energy Standard did not provide a threshold for participation related to a customer's kW demand or kWh usage. The Company is in agreement, as stated earlier in the filing, that there should be some clarification surrounding the use of NAICS codes. Issues such as which codes should be used to determine exempt customers and corresponding verification of those customers is a concern.

Should the Commission establish procedures and/or require utilities to file tariffs relating to customer exclusions which address verification procedures, reporting requirements, customer petitions, or other related issues?

Minnesota Power is in agreement that the Commission, with the input of the Department and other stakeholders, should establish processes and procedures relating to customer exclusions and verification procedures, up to and including a rulemaking proceeding. Companies will need to know when and how periodic recalculation, reporting, applications, etc., will occur. Public utilities will also need guidance on the customer notification and application process.

The Company did encounter additional questions while working to comply with the Commission's requests within the Notice. These issues are also addressed within the text of these Comments. A summary of the issues that require clarification are as follows:

- The definition of "wood products" in relation to customer class exclusion.
- Whether sales to municipal utilities should be counted.
- NAICS code verification

Conclusion:

It is important to note that this is an initial effort at interpreting the impact of the customer exclusions from the Solar Energy Standard. The process will most likely take numerous revisions and be bolstered by guidance from the Commission and other stakeholders. Accordingly, Minnesota Power is open to recommendations and guidance from the Commission. The inclusion of a Solar Energy Standard and corresponding requirements will be a substantial undertaking for the utilities and regulatory bodies alike. There are many topics to address and unknown complications are likely to appear throughout the process. The Company compiled its best effort in outlining what it believes to be the correct course of action while also addressing issues yet to be resolved. Minnesota Power appreciates the opportunity to exchange dialogue on the implementation of this new requirement.

Dated: August 15, 2013

Respectfully submitted,



Lori Hoyum
Policy Manager
Minnesota Power
30 West Superior Street
Duluth, MN 55802
(218) 355-3601
lhoyum@mnpower.com

STATE OF MINNESOTA)
) ss
COUNTY OF RAMSEY)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Roshelle Herstein of the City of White Bear Lake, County of Ramsey, State of Minnesota, says that on the 15th day of August, 2013, she served Minnesota Power's Public Compliance Report and Comment to the Minnesota Public Utilities Commission and the Minnesota Department of Commerce via electronic filing.

/s/ Roshelle Herstein

Subscribed and sworn to before
me this 15th day of August, 2013.

/s/ Jill N. Yeaman

Notary Public - Minnesota
My Commission Expires January 31, 2016

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|----------------------------------|------------------------------------|--|--------------------|-------------------|----------------------------------|
| Ross | Abbey | abbey@fresh-energy.org | Fresh Energy | 408 Saint Peter St Ste 220 St. Paul, MN 55102-1125 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Michael | Allen | michael.allen@allenergysolar.com | All Energy Solar | 721 W 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 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Thor | Bjork | Thor.S.Bjork@xcelenergy.com | Xcel Energy | 414 Nicollet Mall Minneapolis, MN 55401 | Paper 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@state.mn.us | Department of Commerce | 85 7th Place East Suite 500 St. Paul, MN 55101 | Electronic Service | No | SPL_SL_13-542_Interested Parties |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|---------------------------------------|------------------------------------|---|--------------------|-------------------|--------------------------------------|
| Joel | Cannon | jcannon@tenksolar.com | Tenk Solar, Inc. | 9549 Penn Avenue S Bloomington, MN 55431 | Electronic Service | No | SPL_SL_13- 542_Interested Parties |
| 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 |
| Aakash | Chandarana | Aakash.Chandara@xcenergy.com | Xcel Energy Services Inc. | 414 Nicollet Mall 5th Floor Minneapolis, MN 55401 | Paper Service | No | SPL_SL_13- 542_Interested Parties |
| Steve W. | Chriss | Stephen.chriss@walmart.com | Wal-Mart | 2001 Southeast 10th St. Bentonville, AZ 72716-5530 | Paper Service | No | SPL_SL_13- 542_Interested Parties |
| Steve | Coleman | scoleman@appliedenergyinnovations.org | Applied Energy Innovations | 4000 Minnehaha Ave S Minneapolis, MN 55406 | Paper Service | No | SPL_SL_13- 542_Interested Parties |
| Lisa | Daniels | lisadaniels@windustry.org | Windustry | 201 Ridgewood Avenue Minneapolis, MN 55403 | Paper Service | No | SPL_SL_13- 542_Interested Parties |
| Chris | Davis | christopher.davis@state.mn.us | Department of Commerce | Suite 500 85 Seventh Place East St. Paul, MN 551012198 | Electronic Service | No | SPL_SL_13- 542_Interested Parties |
| Dustin | Denison | N/A | Applied Energy Innovations | 4000 Minnehaha Ave S Minneapolis, MN 55406 | Paper Service | No | SPL_SL_13- 542_Interested Parties |
| Ian | Dobson | ian.dobson@ag.state.mn.us | Office of the Attorney General-RUD | Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101 | Electronic Service | Yes | SPL_SL_13- 542_Interested Parties |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|-----------------------------|--|---|--------------------|-------------------|----------------------------------|
| 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 |
| Betsy | Engelking | | Xcel Energy | 7th Floor 414 Nicollet Mall Minneapolis, MN 554011993 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Betsy | Engelking | betsy@geronimoenergy.com | Geronimo Energy | 7650 Edinborough Way Suite 725 Edina, MN 55435 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Rick | Evans | Rick.Evans@xcelenergy.com | Xcel Energy | 404 Nicollet Mall Minneapolis, MN 55401 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 500 Saint Paul, MN 551012198 | Electronic Service | No | SPL_SL_13-542_Interested Parties |
| Nathan | Franzen | nathan@geronimoenergy.com | Geronimo Energy | 7650 Edinborough Way Suite 725 Edina, MN 55435 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Lee | Gabler | Lee.E.Gabler@xcelenergy.com | Xcel Energy | 404 Nicollet Mall Minneapolis, MN 55401 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Benjamin | Gerber | bgerber@mnychamber.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 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|------------------------------------|---|--|--------------------|-------------------|----------------------------------|
| Elizabeth | Goodpaster | bgoodpaster@mncenter.org | MN Center for Environmental Advocacy | Suite 206 26 East Exchange Street St. Paul, MN 551011667 | Electronic Service | No | SPL_SL_13-542_Interested Parties |
| Bill | Grant | Bill.Grant@state.mn.us | Minnesota Department of Commerce | 85 7th Place East, Suite 500 St. Paul, MN 55101 | Electronic Service | No | SPL_SL_13-542_Interested Parties |
| Lloyd | Grooms | lgrooms@winthrop.com | Winthrop and Weinstine | Suite 3500 225 South Sixth Street Minneapolis, MN 554024629 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Burl W. | Haar | burl.haar@state.mn.us | Public Utilities Commission | Suite 350 121 7th Place East St. Paul, MN 551012147 | Electronic Service | Yes | SPL_SL_13-542_Interested Parties |
| Tony | Hainault | anthony.hainault@co.hennepin.mn.us | Hennepin County DES | 701 Fourth Ave. S., Ste 700 Minneapolis, MN 55415-1842 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| J Drake | Hamilton | hamilton@fresh-energy.org | Fresh Energy | 408 St Peter St Saint Paul, MN 55101 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Samuel | Hanson | N/A | 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 | nathan.franzen@westwoodps.com | Westwood Professional Services | 7699 Anagram Drive Eden Prairie, MN 55344 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Brandon | Heath | bheath@misoenergy.org | MISO Energy | 1125 Energy Park Drive St. Paul, MN 55108-5001 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Lynn | Hinkle | lhinkle@mNSEIA.org | Minnesota Solar Energy Industries Association | 2512 33rd Ave South #2 Minneapolis, MN 55406 | 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 |
|------------|-----------|----------------------------------|---------------------------------|--|--------------------|-------------------|----------------------------------|
| 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 |
| David | Horneck | david.g.horneck@xcelenergy.com | Xcel Energy | 1800 Larimer Street Denver, CO 80202 | Paper 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 |
| Steve | Huso | steve.huso@xcelenergy.com | Xcel Energy | G.O. 7th Floor 414 Nicollet Mall Minneapolis, MN 554011993 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| 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 |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-------------|----------------------------------|------------------------------------|--|--------------------|-------------------|----------------------------------|
| Linda | Jensen | linda.s.jensen@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134 | Electronic Service | No | SPL_SL_13-542_Interested Parties |
| Richard | Johnson | johnsonr@moss-barnett.com | Moss & Barnett | 4800 Wells Fargo Center90 South Seventh Street Minneapolis, MN 55402 | Electronic Service | No | SPL_SL_13-542_Interested Parties |
| Kerry | Klemm | kerry.r.klemm@xcelenergy.com | Xcel Energy Services, Inc | 414 Nicollet Mall Minneapolis, MN 55401 | Paper 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 |
| Scott | Kurtz | Scott.J.Kurtz@xcelenergy.com | Northern States Power Co - MN | 825 Rice Street St. Paul, MN 55117 | Paper 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 | Paper 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 |
| 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 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|--------------------------------------|-----------------------------|--|--------------------|-------------------|----------------------------------|
| Rebecca | Lundberg | rebecca.lundberg@powerfullygreen.com | Powerfully Green | 11451 Oregon Ave N Champlin, MN 55316 | Electronic Service | No | SPL_SL_13-542_Interested Parties |
| Paula | Maccabee | Pmaccabee@visi.com | Just Change Law Offices | 1961 Selby Avenue St. Paul, MN 55104 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Casey | Maccullum | casey@appliedenergyinnovations.org | Applied Energy Innovations | 4000 Minnehaha Ave S Minneapolis, MN 55406 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Susan | Mackenzie | susan.mackenzie@state.mn.us | Public Utilities Commission | Suite 350121 7th Place East St. Paul, MN 551012147 | Electronic Service | No | SPL_SL_13-542_Interested Parties |
| Kavita | Maini | 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 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Natalie | McIntire | natalie.mcintire@gmail.com | Wind on the Wires | 570 Asbury St Ste 201 St. Paul, MN 55104-1850 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Brian | Millberg | Brian.Millberg@minneapolismn.gov | City of Minneapolis | 350 South 5th St, #315 Minneapolis, MN 55415 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Stacy | Miller | stacy.miller@state.mn.us | Department of Commerce | State Energy Office 85 7th Place East, Suite 500 St. Paul, MN 55101 | Electronic Service | No | SPL_SL_13-542_Interested Parties |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | 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 |
|------------|-----------|-------------------------------|-----------------------------|---|--------------------|-------------------|--------------------------------------|
| 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 | | Fresh Energy | Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102 | Paper Service | No | SPL_SL_13- 542_Interested Parties |
| Rolf | Nordstrom | rnordstrom@gpisd.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 |
| Nick | Paluck | | Xcel Energy | 7th Floor 414 Nicollet Mall Minneapolis, MN 554011993 | Paper Service | No | SPL_SL_13- 542_Interested Parties |
| James | Pearson | N/A | Xcel Energy | 414 Nicollet Mall Minneapolis, MN 55401 | Paper 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 |
| Charlie | Pickard | cpickard@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 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|----------------|---------------------------------|---|--|--------------------|-------------------|----------------------------------|
| Kent | Ragsdale | kentragdsdale@alliantenergy.com | Alliant Energy-Interstate Power and Light Company | P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351 | Electronic Service | No | SPL_SL_13-542_Interested Parties |
| Enio | Ricci | ericci@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 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Matthew J. | Schuerger P.E. | mjpub@earthlink.net | Energy Systems Consulting Services, LLC | P.O. Box 16129 St. Paul, MN 55116 | Electronic Service | No | SPL_SL_13-542_Interested Parties |
| Kevin | Schwain | Kevin.D.Schwain@xcelenergy.com | Xcel Energy | 404 Nicollet Mall Minneapolis, MN 55401 | Paper 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 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|----------------|--------------------------------------|--------------------------------|--|--------------------|-------------------|----------------------------------|
| 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 |
| Erin | Stojan Ruccolo | | Fresh Energy | 408 Saint Peter St Ste 220 Saint Paul, MN 55102-1125 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| James M. | Strommen | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered | 470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402 | Electronic Service | No | SPL_SL_13-542_Interested Parties |
| Deb | Sundin | deb.sundin@xcelenergy.com | Xcel Energy | 414 Nicollet Mall Minneapolis, MN 55401 | Electronic Service | No | SPL_SL_13-542_Interested Parties |
| SaGonna | Thompson | Regulatory.Records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 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 | N/A | Metropolitan Council | 390 Robert St N Saint Paul, MN 55101-1805 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Daniel | Williams | N/A | Powerfully Green | 11451 Oregon Avenue N Champlin, MN 55316 | Paper Service | No | SPL_SL_13-542_Interested Parties |
| Steven | Wishart | | Xcel Energy | 7th Floor 414 Nicollet Mall Minneapolis, MN 554011993 | 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 |
|------------|-----------|-------------------------------|------------------------------------|---|--------------------|-------------------|--------------------------------------|
| 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 |