



May 13, 2026

Sasha Bergman, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

***Subject: Dakota Electric Association Reply Comments in Response to
April 10, 2026 Notice of Comment Period***

***In the Matter of Updating the Generic Standards for the Interconnection
and Operation of Distributed Generation Facilities Established under Minn.
Stat. §216B.1611
Docket No. E999/CI-16-521***

Dear Ms. Bergman:

Dakota Electric Association (Dakota Electric or Cooperative) respectfully submits these reply comments in response to the Minnesota Public Utilities Commission's (Commission) April 10, 2026 Notice of Comment Period (April 2026 Notice) in the above referenced docket.

I. Background

On May 1, 2026, Dakota Electric Association (Dakota Electric or Cooperative) submitted comments in response to the Commission's Notice. Additionally, the following parties filed comments in response to the Notice:

- Xcel Energy (Xcel);
- Steve Coleman;
- Minnesota Power;
- Minnesota Rural Electric Association;
- Minnesota Department of Commerce (Department);
- MnSEIA; and,
- Otter Tail Power Company.

II. Dakota Electric Reply Comments

Based on the Cooperative's review of other parties' comments, the Cooperative maintains its original recommendation in our comments with one modification as discussed below.

In its comments, Xcel suggested that the Commission modify the proposed changes in MN DIP section 1.1.1.1 and 2.1.1 from using *50kW* Nameplate Rating as the Simplified Process Applicability to *40kW* Nameplate Rating. Although Dakota Electric originally supported moving to 50kW, Dakota Electric now supports Xcel's 40kW Nameplate Rating position due to the complexities of the insurance requirements in 5.10. To Dakota Electric's knowledge, the Technical Subgroup (TSG) did not discuss modifications to the required insurance amounts. Dakota Electric believes that the Distribution Generation Working Group (DGWG) or TSG should further consider recommended modifications to MN-DIP section 5.10 before raising the Nameplate Capacity listed in MN-DIP section 1.1.1.1 and 2.1.1 above 40kW. Dakota Electric recommends that the Commission accept Xcel's proposed modifications as written.¹

In its comments, MnSEIA discussed relevant statutes that use the term "capacity" and where the statutes do not specify "*Export Capacity*" or "*Nameplate Capacity*." The

¹ May 1, 2026 Xcel Energy Comments, Page 4.

Cooperative notes that MnSEIA failed to mention the open rulemaking docket that is addressing the definition of capacity.² Dakota Electric further notes that Export Capacity, as defined and agreed upon by workgroup members, cannot be defined without reference to Nameplate Capacity. Therefore, one must consider that any reference to Export Capacity is a derivative of a facility's Nameplate Capacity. A Distributed Energy Resource's (DER) capacity is assumed to be its Nameplate Capacity *unless* it is "limited using an acceptable means."³ By this definition, a DER must utilize some type of acceptable control method to limit its export capacity. Dakota Electric again recommends that the Commission take no action on Contested Items No. 1 and No. 2. The remainder of the changes to the MN-DIP can be implemented without waiting for conclusion of the pending capacity rulemaking docket.

Conclusion

Dakota Electric appreciates the opportunity to provide comments on this matter, and if you or your staff have any questions about these reply comments, please contact me at 651-463-6258 or aheinen@dakotaelectric.com.

Sincerely,

/s/ Adam J. Heinen

Adam J. Heinen
Vice President of Regulatory Services
Dakota Electric Association
4300 220th Street West
Farmington, MN 55024

² Docket No. E999/R-25-86.

³ See MN DIP Glossary of Terms. April 10, 2026 Notice of Comment Period, Page 118.

/s/ Alex Nelson

Alex Nelson
System Design Manager
Dakota Electric Association
4300 220th Street West
Farmington, MN 55024

Certificate of Service

I, Nicole McEathron, hereby certify that I have this day served copies of the attached document to those on the following service list by e-filing, personal service, or by causing to be placed in the U.S. mail at Farmington, Minnesota.

Docket No. E-999/CI-16-521

Dated this 13th day of May 2026

/s/ Nicole McEathron

Nicole McEathron

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Brian	Allen	brian.allen@allenergysolar.com	All Energy Solar, Inc		1642 Carroll Ave Saint Paul MN, 55104 United States	Electronic Service		No	16-521Official Service List PUC
2	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	16-521Official Service List PUC
3	Janet	Anderson	jcainstp@icloud.com	-		1799 Sargent St. Paul MN, 55105 United States	Electronic Service		No	16-521Official Service List PUC
4	Jay	Anderson	jaya@cmpas.org	CMPAS		7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States	Electronic Service		No	16-521Official Service List PUC
5	John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance		1313 5th St SE Ste 303 Minneapolis MN, 55414 United States	Electronic Service		No	16-521Official Service List PUC
6	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	16-521Official Service List PUC
7	Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	16-521Official Service List PUC
8	Jeff	Benson	jbenson@southcentralelectric.com	South Central Electric Association		PO Box 150 71176 Tiell Drive St. James MN, 56081 United States	Electronic Service		No	16-521Official Service List PUC
9	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	16-521Official Service List PUC
10	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	16-521Official Service List PUC
11	Barb	Bischoff	barb.bischoff@nngco.com	Northern Natural Gas Co.		CORP HQ, 714 1111 So. 103rd Street Omaha NE, 68124-1000 United States	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
12	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	16-521Official Service List PUC
13	Nick	Bowman	nick@communitysolaraccess.org	CCSA		1380 Monroe Street NW #721 Washington DC, 20010 United States	Electronic Service		No	16-521Official Service List PUC
14	Kenneth	Bradley	kbradley@environmentminnesota.org			2837 Emerson Ave S Apt CW112 Minneapolis MN, 55408 United States	Electronic Service		No	16-521Official Service List PUC
15	Jon	Brekke	jbrekke@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	16-521Official Service List PUC
16	Kathleen	Brennan	kbrennan@spencerfane.com	Spencer Fane LLP		100 South Fifth Street, Suite 2500 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
17	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	16-521Official Service List PUC
18	Christopher	Browning	christopher.browning@nexteraenergy.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
19	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	16-521Official Service List PUC
20	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	16-521Official Service List PUC
21	Jerry	Byer	jbyer@itasca-mantrap.com	Itasca-Mantrap Electric Cooperative		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	16-521Official Service List PUC
22	Daniel T	Carlisle	todd-wad@toddwadana.coop	Todd-Wadana Electric Cooperative		550 Ash Ave NE PO Box 431 Wadena MN, 56482 United States	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
23	Douglas M.	Carnival	dcarnival@carnivalberns.com	McGrann Shea Carnival Straughn & Lamb		800 Nicollet Mall Ste 2600 Minneapolis MN, 55402-7035 United States	Electronic Service		No	16-521Official Service List PUC
24	Pat	Carruth	pat@mnvalleyrec.com	Minnesota Valley Coop. Light & Power Assn.		501 S 1st St. PO Box 248 Montevideo MN, 56265 United States	Electronic Service		No	16-521Official Service List PUC
25	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	16-521Official Service List PUC
26	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	16-521Official Service List PUC
27	Kevin	Cray	kevin@communitysolaraccess.org	CCSA		1644 Platte St Denver CO, 80202 United States	Electronic Service		No	16-521Official Service List PUC
28	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	16-521Official Service List PUC
29	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	16-521Official Service List PUC
30	George	Damian	gdamian@cleanenergyeconomymn.org	Clean Energy Economy MN		13713 Washburn Ave S Burnsville MN, 55337 United States	Electronic Service		No	16-521Official Service List PUC
31	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	16-521Official Service List PUC
32	James	Darabi	james.darabi@solarfarm.com			2355 Fairview Ave #101 St. Paul MN, 55113 United States	Electronic Service		No	16-521Official Service List PUC
33	Danielle	DeMarre	danielle.demarre@allenergysolar.com	All Energy Solar		1264 Energy Lane St Paul MN, 55108	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
34	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	16-521Official Service List PUC
35	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	16-521Official Service List PUC
36	Cheryl	Dietrich	cheryl.dietrich@nexteraenergy.com	NextEra Energy Resources, LLC		700 Universe Blvd E1W/JB Juno Beach FL, 33408 United States	Electronic Service		No	16-521Official Service List PUC
37	Kristin	Dolan	kdolan@meeker.coop	Meeker Cooperative Light & Power Assn		1725 US Hwy 12 E. Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	16-521Official Service List PUC
38	Renee	Doyle	guydoyleelectric@gmail.com	Doyle Electric Inc.		PO Box 295 Amboy MN, 56010 United States	Electronic Service		No	16-521Official Service List PUC
39	John R.	Dunlop, P.E.	jdunlop@resminn.com	Renewable Energy Services		Suite 300 448 Morgan Ave. S. Minneapolis MN, 55405-2030 United States	Electronic Service		No	16-521Official Service List PUC
40	Kelly	Dybdahl	kdybdahl@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.		205 W. Hwy. 14 Tyler MN, 56178 United States	Electronic Service		No	16-521Official Service List PUC
41	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	16-521Official Service List PUC
42	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	16-521Official Service List PUC
43	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	16-521Official Service List PUC
44	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
45	Kornbaum	Frank	fkornbaum@mnpower.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
46	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	16-521Official Service List PUC
47	Katelyn	Frye	kfrye@mnpower.com	Minnesota Power		30 W Superiot St Duluth MN, 55802-2093 United States	Electronic Service		No	16-521Official Service List PUC
48	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	16-521Official Service List PUC
49	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	16-521Official Service List PUC
50	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	16-521Official Service List PUC
51	Sarah	Groeber	sgroeber@redwoodelectric.com	Redwood Electric Cooperative		60 Pine St Clements MN, 56224 United States	Electronic Service		No	16-521Official Service List PUC
52	Cody	Gustafson	cgustafson@mnpower.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
53	Tom	Guttormson	tom.guttormson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd Ramsey MN, 55303 United States	Electronic Service		No	16-521Official Service List PUC
54	Natalie	Haberman	townsend@fresh-energy.org	Fresh Energy		408 St Peter St # 350 St. Paul MN, 55102 United States	Electronic Service		No	16-521Official Service List PUC
55	James	Haler	jhaler@southcentralelectric.com	South Central Electric Association		71176 Tiell Dr P. O. Box 150 St. James MN, 56081 United States	Electronic Service		No	16-521Official Service List PUC
56	Donald	Hanson	dfhanson@ieee.org			P. O. Box 44579 Eden Prairie	Electronic Service		No	16-521Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55344 United States				Service List PUC
57	John	Harlander	john.c.harlander@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC
58	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	16-521Official Service List PUC
59	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
60	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
61	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	16-521Official Service List PUC
62	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	16-521Official Service List PUC
63	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	16-521Official Service List PUC
64	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	16-521Official Service List PUC
65	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	16-521Official Service List PUC
66	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	16-521Official Service List PUC
67	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
68	Robert	Jagusch	rjagusch@mmua.org	MMUA		3025 Harbor Lane N Minneapolis MN, 55447 United States	Electronic Service		No	16-521Official Service List PUC
69	Chris	Jarosch	chris@carrcreekelectricservice.com	Carr Creek Electric Service, LLC		209 Sommers Street North Hudson WI, 54016 United States	Electronic Service		No	16-521Official Service List PUC
70	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
71	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	16-521Official Service List PUC
72	Kevin	Joyce	kjoyce@tesla.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
73	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	16-521Official Service List PUC
74	Ralph	Kaehler	ralph.kaehler@gmail.com			13700 Co. Rd. 9 Eyota MN, 55934 United States	Electronic Service		No	16-521Official Service List PUC
75	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	16-521Official Service List PUC
76	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	16-521Official Service List PUC
77	Tom	Key	tkey@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	16-521Official Service List PUC
78	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	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
79	Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power		1725 US Hwy 12 E Litchfield MN, 55355 United States	Electronic Service		No	16-521Official Service List PUC
80	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	16-521Official Service List PUC
81	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
82	Corrina	Kumpe	ckumpe@mysunshare.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
83	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	16-521Official Service List PUC
84	Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar		3209 W. 76th St #305 Edina MN, 55435 United States	Electronic Service		No	16-521Official Service List PUC
85	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	16-521Official Service List PUC
86	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	16-521Official Service List PUC
87	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	16-521Official Service List PUC
88	Carl	Linville	clinville@raponline.org			50 State Street Suite #3 Montpelier VT, 05602 United States	Electronic Service		No	16-521Official Service List PUC
89	Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products		PO Box 108 Springfield MN, 56087 United States	Electronic Service		No	16-521Official Service List PUC
90	Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy		414 Nicillet Mall 7th Floor	Electronic Service		No	16-521Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55401-1993 United States				Service List PUC
91	Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.		PO Box 1156 Latham NY, 12110-1156 United States	Electronic Service		No	16-521Official Service List PUC
92	Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.		10710 Town Square Dr NE Ste 201 Minneapolis MN, 55449 United States	Electronic Service		No	16-521Official Service List PUC
93	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	16-521Official Service List PUC
94	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	16-521Official Service List PUC
95	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	16-521Official Service List PUC
96	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	16-521Official Service List PUC
97	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	16-521Official Service List PUC
98	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	16-521Official Service List PUC
99	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	16-521Official Service List PUC
100	Pontius	Mike	mpontius@mnpower.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
101	Luther	Miller	luther.c.miller@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
102	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	16-521Official Service List PUC
103	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	16-521Official Service List PUC
104	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
105	Alex	Nelson	anelson@dakotaelectric.com	Dakota Electric Association		4300 220nd St Farmington MN, 55024 United States	Electronic Service		No	16-521Official Service List PUC
106	Ben	Nelson	benn@cmpasgroup.org	CMPMA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	16-521Official Service List PUC
107	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
108	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	16-521Official Service List PUC
109	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	16-521Official Service List PUC
110	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	16-521Official Service List PUC
111	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	16-521Official Service List PUC
112	Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc		P.O. Box 639 Tyler MN, 56178-0639	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
113	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	16-521Official Service List PUC
114	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	16-521Official Service List PUC
115	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Fergus Falls MN, 56537 United States	Electronic Service		No	16-521Official Service List PUC
116	Bethany	Owen	bowen@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	16-521Official Service List PUC
117	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
118	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	16-521Official Service List PUC
119	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	16-521Official Service List PUC
120	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	16-521Official Service List PUC
121	Susan	Peirce	susan.peirce@state.mn.us		Department of Commerce	85 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
122	Wess	Pfaff	wes.pfaff@mrenergy.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
123	Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel		null null, null United States	Electronic Service		No	16-521Official Service List PUC
124	Elizabeth	Psihos	elizabeth.psihos@idealenergies.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
125	Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC		3363 Republic Ave Saint Louis Park MN, 55426 United States	Electronic Service		No	16-521Official Service List PUC
126	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	16-521Official Service List PUC
127	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	16-521Official Service List PUC
128	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	16-521Official Service List PUC
129	Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC		1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	16-521Official Service List PUC
130	Daniel	Rogers	dan@nokomispartners.com			2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	16-521Official Service List PUC
131	Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC
132	Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electrical Association		PO Box 529 24386 State Highway 4 Sleepy Eye MN, 56085 United States	Electronic Service		No	16-521Official Service List PUC
133	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	16-521Official Service List PUC
134	Kenric	Scheevel	kjs@dairynet.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602 United States	Electronic Service		No	16-521Official Service List PUC
135	Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC

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136	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	16-521Official Service List PUC
137	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	16-521Official Service List PUC
138	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	16-521Official Service List PUC
139	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	16-521Official Service List PUC
140	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	16-521Official Service List PUC
141	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	16-521Official Service List PUC
142	Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power		1725 US Highway 12 E Suite 100 Litchfield MN, 55355 United States	Electronic Service		No	16-521Official Service List PUC
143	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
144	Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy		800 LaSalle Avenue P.O. Box 59038 Minneapolis MN, 55459-0038 United States	Electronic Service		No	16-521Official Service List PUC
145	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	16-521Official Service List PUC
146	Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Association		24386 State Hwy. 4, PO Box 529 Sleepy Eye MN, 56085	Electronic Service		No	16-521Official Service List PUC

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						United States				
147	Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies		5810 Nicollet Ave Minneapolis MN, 55419 United States	Electronic Service		No	16-521Official Service List PUC
148	Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy		401 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	16-521Official Service List PUC
149	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	16-521Official Service List PUC
150	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
151	Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric		PO Box 58 Slayton MN, 56172 United States	Electronic Service		No	16-521Official Service List PUC
152	Bryant	Tauer	btauer@whe.org	Wright-Hennepin		6800 Electric Dr Rockford MN, 55373 United States	Electronic Service		No	16-521Official Service List PUC
153	Emma Marshall	Torres	emarshall-torres@convergentep.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
154	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	16-521Official Service List PUC
155	Jeff	Triplett	triplettj@powersystem.org	MREA		10710 Town Square Dr NW St 201 Minneapolis MN, 55449 United States	Electronic Service		No	16-521Official Service List PUC
156	Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric		P.O. Box 58 Slayton MN, 56127-0058 United States	Electronic Service		No	16-521Official Service List PUC
157	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	16-521Official Service List PUC
158	Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC

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159	Ellen	Veazey	lveazey@solarunitedneighbors.org	Solar United Neighbors		1350 Connecticut Ave NW Ste 412 Washington DC, 20036 United States	Electronic Service		No	16-521Official Service List PUC
160	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	16-521Official Service List PUC
161	Wendy	Vorasane	wendy.vorasane@idealenergies.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
162	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	16-521Official Service List PUC
163	Samantha	Weaver	samantha@communitysolaraccess.org	Coalition for Community Solar Access		1380 Monroe St. Washington DC DC, 20010 United States	Electronic Service		No	16-521Official Service List PUC
164	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	16-521Official Service List PUC
165	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	16-521Official Service List PUC
166	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	16-521Official Service List PUC
167	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	16-521Official Service List PUC
168	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	16-521Official Service List PUC
169	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-	Electronic Service		No	16-521Official Service List PUC

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						8920 United States				