



414 Nicollet Mall
Minneapolis, MN 55401

March 23, 2020

—Via Electronic Filing—

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-1247

RE: RESPONSE TO REQUEST FOR RECONSIDERATION
2019 COGENERATION AND SMALL POWER PRODUCTION
DOCKET NO. E999/PR-19-9

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (MPUC or Commission) this Response to the Environmental Law & Policy Center and Institute for Local Self Reliance March 12, 2020 PETITION FOR RECONSIDERATION (Petition) in the above-referenced docket.

INTRODUCTION

The Petition sets forth the correct standard of review for the Commission, but fails to meet this standard. The MPUC generally reviews petitions for reconsideration to “determine whether the petition (i) raises new issues, (ii) points to new and relevant evidence, (iii) exposes errors or ambiguities in the underlying order, or (iv) otherwise persuades the Commission that it should rethink its decision.” *In the Matter of Xcel Energy’s Petition for Approval of Electric Vehicle Pilot Programs*, Docket No. E002/M-18-643, October 7, 2019.

Many of the issues raised in the Petition are not new. Those new issues it raises point to old evidence from the 1980s that has been eclipsed by many developments over the last 40 years that render its points inapplicable to current circumstances. The Joint Commenters have not pointed to any errors or ambiguities in the Commission’s February 21, 2020 order, and its Petition should be denied.

The fundamental position in the Petition is that according to the Joint Commenters distributed generation customers who are qualified facilities (QFs) are unable to do business in Minnesota because they do not know what the avoided costs of the utilities are and therefore do not know what they would be paid for production. They

claim that this situation runs afoul of the PURPA and state law obligations. They assert that the Minnesota utilities have discouraged interconnection. They assert that they need the relief they seek in order to reduce our reliance on fossil fuels. They assert that their requested relief is necessary as otherwise utilities would continue to give preference to utility self-generation. They also assert that the Commission has not previously ruled on trade secret issues similar to this.

All of these points of the Joint Commenters are incorrect and do not align with the facts. Here are the facts.

A. Pertinent Avoided Cost Information Is Publicly Available

The avoided cost information that shows amounts paid for production for QFs up to 1 MW has been publicly filed in this docket. This avoided cost information was publicly filed in this way before the Joint Commenters brought their initial filing in this docket. This same information is (and has been) publicly filed in our tariff books that are publicly available on the internet.¹ Also, this information was publicly filed in our January 2, 2019 filing in this docket at tariff sheets 9-2 through 9-4.1 (in Exhibit 1 to that filing), and continued to be publicly filed in this docket in our tariff filing of March 27, 2019 and our compliance filing of September 10, 2019. These are the avoided cost rates that apply to production from QFs less than 1 MW capacity that meet our tariff requirements.

We also note that the Joint Commenters are not developers. Because they are not developers they may lack understanding on how the information we provide actually helps developers, and how we provide incentives above avoided cost to developers and customers as explained below. It is also noteworthy that not a single developer active in Minnesota has filed comments supporting the positions of the Joint Commenters here.²

¹ See, for example, the following link (current as of March 23, 2020):

https://www.xcelenergy.com/staticfiles/xeresponsive/Company/Rates%20&%20Regulations/Me_Section_9.pdf. The avoided costs rates are the energy and capacity rates depicted for Rate Codes A51-A56 at tariff sheets 9-3 through 9-4.2 at this link.

² Ridge Energy is the only developer to file comments supporting the Joint Commenters in this docket. As explained in our March 18, 2019 filing, Ridge Energy's comments addressed its proposed project in South Dakota, not any project in Minnesota. We explained there that we had let Ridge Energy know that our avoided costs for South Dakota were below \$29/MWh (based on our 2013 wind RFP). The exact pricing was third-party proprietary information of another developer, and we could not take steps to obtain permission to release this information to Ridge Energy under a NDA until it had first established a Legally Enforceable Obligation (LEO). Ridge Energy was asking for a rate well above our avoided cost rate, and was unwilling to proceed with the project. The Ridge Energy comments do not relate to the trade secret information that is the subject of the current docket.

Our March 18, 2019 comments in this docket informed the Joint Commenters that developers have acknowledged that they are receiving appropriate avoided cost information from Xcel Energy. In our March 2019 filing, we noted that the January 17, 2019, hearing in Docket No. E999/CI-16-521 addressed the Joint Commenter's concern that there needs to be more transparency on avoided cost rates from the utilities, and the Commission asked if there were any problems with Xcel Energy – and the response from a developer was:

In terms of working with customers on distributed generation and in implementing and running a transparent process, Xcel is not the problem here. Xcel has worked very well with their customers. They have worked very well with getting people interconnected. . . . You can look at their A52 rate on their tariff sheet, in their rate book, and you can say “hmm, can we do a project for that?” And, if the answer is yes, then you can apply. You can apply for the rate – it is right there.³

In Minnesota, in addition to compensation for excess production at avoided cost, QFs can be eligible for additional payments. This includes incentive payments under our Solar*Rewards program, and additional payments under our PV Demand Credit Rider. Further, bill credits well in excess of avoided costs are available under our distributed generation community solar garden program, which is the largest such program in the nation by a wide margin.

QFs 1 MW or larger are still able to participate in generation. For example, in response to a Commission order, our June 17, 2019 filing in Docket Nos. E999/CI-16-521 and E999/CI-01-1023 describes the information we provide to developers when they ask about pricing for a QF project 1 MW or larger, even if they have not started their project. This filing is included as Attachment A to this filing. This clear communication helps to set expectation after an inquiry from the QF. Far from the claim of the Joint Commenters that this is “too late in the process” our communication of this happens at the very beginning. This helps gauge expectations early on as to what the maximum ceiling could be for the contracted price, with the likely price being below this. The actual price is the proprietary information of a third party developer, and their permission would be needed before we could disclose their proprietary information to another party. As explained in Attachment A (and the letter template to developers attached to that), once a LEO has been established, we can provide more specific information. Our experience has been that these third parties have been cooperative in authorizing the release of this information under a NDA once a LEO has been established. As shown by the service list attached to Attachment A, the Joint Commenters were participants in Docket Nos. E999/CI-16-521 and E999/CI-01-1023. If the Joint Commenters have a concern over our

³ See, hearing archive, beginning at about 2:02.

approach on this, they can submit their concerns in Docket Nos. E999/CI-16-521 and E999/CI-01-1023. They have not filed any objection or concern with this approach in those dockets.

We note that the Petition of the Joint Commenters attacks Xcel Energy's approach of not providing the third-party proprietary information to developers until after a LEO is established. Our approach is reasonable as explained in Attachment A. More importantly for present purposes, however, the information that we would provide to a renewable QF of at least 1 MW once a LEO has been established is not the same information at issue in the current docket. The current docket has trade secret information in Schedule B of our September 10, 2019 filing, addressing resource specific "planned utility generating facility additions anticipated during the next ten years" with \$/MWh energy costs, etc. This is different from the type of information we provide to a renewable QF of at least 1 MW once a LEO has been established, as this type of information we then provide is based on Minn. Stat. § 216B.164, Subd. 4, which is "... the utility's least cost renewable energy or bid of a competitive supplier of a least cost renewable energy facility, whichever is lower." Accordingly, the concern of the Joint Commenters on this issue is not relevant to the type of information they seek to have made public in this docket.

Further, we are seeing these larger QFs of 1 MW or larger selecting market-based rates for their production (based on the MISO LMP rate at a specific node). This type of pricing is clear, objective, and fair based on current market conditions at the time of production. Developers are entering into Power Purchase Agreements (PPAs) based on this pricing.⁴ Developers do not need to see the third-party confidential information belonging to a competitive developer in order to choose to be compensated at market-based rates in place at the time of production. The market-based rates at the time of production are not known until the time of production and are publicly available at that time. While an exact rate of compensation is not known until hour of production, the state of the market pricing is publicly available information from sources such as MISO. (i.e. historic and real time data is available at the MISO website for various locations or nodes).

B. There is Robust Participation in Distributed Generation

As shown in our comments of March 18, 2019 (and contrary to the Joint Commenters statement in their March 8, 2019 filing that there are no distributed generation systems in MN), there is robust participation of distributed generation systems in our service

⁴ For some recent examples of LMP-based pricing, see the PPA with Rapidan Hydroelectric, LLC, in MPUC Docket No. E002/M-20-260, and, the PPA with the University of Minnesota in MPUC Docket No. E002/M-20-39.

territory. We pointed out that by the end of 2018 we had over 4,800 distributed generation facilities (with over 970 MW of capacity) interconnected with us. We also note the nation-leading growth and size of our distributed generation community solar garden program, where we interconnected 246 MW by the end of 2017, 505 MW by the end of 2018, and 656 MW by the end of 2019 under this specific program. This program continues to grow, with over 250 MW of applications in process.

Numerous media outlets have reported on the surging market for DG projects in Xcel Energy's Minnesota service territory—and the numbers continue to grow. As shown by the large number of interconnections in our service territory in Minnesota, there is no barrier to interconnection. There is nothing in their Petition that addresses any need to improve distributed generation interconnections, nor would granting their petition increase participation in distributed generation.

C. References to Fossil Generation is Misplaced

The Joint Commenter's assertion about continued reliance on fossil generation is misplaced, and is anchored in the 1980s. Xcel Energy is a national leader in reducing reliance on fossil fuel. For the last 13 years, Xcel Energy has been a national leader in Wind production.⁵ This is renewable energy, and is being provided to our customers. In 2018, we were the first utility to publicly set a goal of achieving 80% carbon reductions by 2030, and having a goal of being 100% carbon-neutral by 2050.⁶ Other utilities around the country have started to follow and to publicly adopt this same approach.⁷

The mix of fossil, nuclear, hydro, wind and solar energy generation, and how that is combined with load forecasting and desired demand-side management and many other factors, is addressed and set by the Commission as part of the Integrated Resource Planning (IRP) dockets. The Integrated Resource Plans are required by Minn. Stat. § 216B.2422 and Minn. R. 7843.0400. This IRP statute was first adopted in 1993 and has had several amendments since then. In other words, contrary to the 1980s, the utilities in Minnesota today do not set these matters and have not done so for a long time. Through the IRP process, overseen by the Commission, reductions in fossil fuel can be achieved in a thoughtful way.

⁵https://www.xcelenergy.com/company/media_room/news_releases/xcel_energy_recognized_for_lasting_wind_leadership

⁶ https://www.xcelenergy.com/company/media_room/news_releases/xcel_energy_aims_for_zero-carbon_electricity_by_2050

⁷ See, for example, <https://insideclimatenews.org/news/15102019/utilities-zero-emissions-plans-urgency-coal-gas-duke-dte-xcel>

Our current IRP petition in MPUC Docket No. E002/RP-19-368, notes the many elements of our IRP proposal. In this docket we have noted that while the exact wind and solar mix could vary based on a variety of reasons, we proposed to add 4,000 MW of cumulative resources by 2034 (the first being in 2025) and approximately 1,200 MW of cumulative wind by 2034 to replace wind that is set to retire from our system during that period. Our filing in the current IRP docket notes that we are currently engaged in the largest build-out of new wind resources in our Company's history – thanks in large part to the Commission's approval of our last Resource Plan and our 1,850 MW wind portfolio. As noted there, we expect that the 1,850 MW of wind generation resulting from projects that include competitively bid PPAs, Build-Own transfers, and self-builds that will achieve commercial operation by 2022. By 2022, wind is expected to provide more than 35 percent of the electricity for our customers in this region, making it the largest component of our overall generation portfolio.

No part of the relief sought in the Petition would impact how much renewable generation is interconnected with Xcel Energy.

D. References to Xcel Energy Favoring its Own Generation is Misplaced

Contrary to the Joint Commenter's statements, and contrary to the process from the 1980s, outside of PURPA "puts" to us for distributed generation at our tariffed rates, new generation resources are typically acquired through a competitive bid process. Projects are selected and approved by the Commission based on lowest cost as well as other project operational attributes. These attributes are agnostic to Company ownership.

We previously explained this to the Joint Commenters in our February 20 and March 18, 2019 Comments in this docket. There we explained that in response to our 2016 competitive RFP there were over 30 bids from developers for wind generation that was priced below \$22/MWh. Also, the last time that we had a capacity need, there was a contested case hearing so that the Minnesota Department of Commerce, a variety of intervenors, the ALJ, and then Commission, could weigh the bids from various developers and the Company to determine which bids would be accepted. (*See*, Docket No. E002/CN-12-1240, *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Competitive Resource Acquisition Proposal and Certificate of Need*). The Joint Commenters also previously acknowledged the competitive nature for generation in Minnesota. (Joint Commenters, March 8, pp. 5-6). There is a robust competitive framework in Minnesota for adding generation, and there has been no showing how there would be more competition with the public release of the Protected Data. In prior filings in this docket we showed the opposite –

that there would be a risk of competitive harm from the public release of the Protected Data.

E. The Scope of Trade Secret Protection Under the Order is Appropriate

The Joint Commenters have also mischaracterized how the Minnesota Government Data Practices Act has been implemented previously by the Commission and how it should be interpreted. The Joint Commenters claim that Commission in this docket has departed from established practice in ruling on what is trade secret. This is not correct.

We pointed out in our February 22, 2019 filing in this docket how the Commission addressed similar trade secret issues in Docket No. E002/M-04-2055. In 2005, we pointed out in that earlier docket the long-standing practice of treating this type of information as trade secret. The Commission's July 14, 2006 order in this earlier docket affirmed this practice. The type of information at issue in that earlier docket was the monthly avoided cost information. This generally aligns with the information marked as trade secret in our September 10, 2019 compliance filing in the current docket (in Attachment A to that filing on pages 3 and 4; and, in Attachment B to that filing on pages 1, 12 and 13) with projected avoided cost pricing for years 2020 through 2023. The difference being that the referenced trade secret information in the September 2019 filing is projected pricing grouped by seasons in a year along with an annual number, while the information in the 04-2055 docket was by calendar month for the current year. So, while the Commission's February 2020 order in the current docket is correct at page 8 when it states that the "specific issue at hand appears to be an issue of first impression for the Commission," the Commission has none-the-less addressed a similar issue in 2006 and even before 2006 this type of information was treated by the utilities as being non-public. None of the information marked as trade secret in our September 20, 2019 compliance filing contain the final \$/kWh avoided cost values as reflected in our tariffed rates that we pay for production. Otherwise stated, in this filing we publicly provide the final \$/kWh avoided cost values that we pay for production and these values are also reflected in our publicly filed tariffs.

The Staff Briefing Papers for the August 22, 2019 Commission Agenda Meeting in this matter, at page 19, note the research it did on this issue and its conclusion that the utilities have been treating the information (marked as trade secret in the current docket) as trade secret in their annual filings with the Commission since at least 2004. We also note the contemporaneous construction of a statute by an administrative agency should not be lightly overturned or disregarded where the construction has been acted upon for many years. *U.S. v. State of Minnesota*, 113 F.2d 770, 774 (8th Cir. 1940). Also, long-term acquiescence in the practical construction placed upon a statute

by an administrative official is entitled to great weight in the construction thereof. *City of St. Paul v. Hall*, 239 Minn. 378, 381-382, 58 N.W.2d 761, 763 (Minn. 1953). Given the length of time that the material at issue has been treated by the Commission as trade secret should not be lightly overturned or disregarded. Its prior approval and long-standing practice is entitled to great weight.

Similar to its earlier filings in this docket, the Joint Commenters repeat their citations of several judicial orders. As we have noted previously, the Joint Commenters cite the cases of *Prairie Island Indian Cmty v. Minnesota Dep't of Public Safety*, 658 N.W.2d 876 (Minn. Ct. App. 2003) and *In Re Rabr Malting Co.*, 632 N.W.2d 572 (Minn. 2001) to support their position. We previously showed in our March 18 comments that those cases do not apply here. The Joint Commenters use the same quote from the *Prairie Island* case that they used in their March 8 comments, and this is merely a summary of the Minnesota Supreme Court's decision in *In Re Rabr Malting Co.* The court's decision in *In Re Rabr Malting Co.* is inapplicable to the current situation as the opinion does not address the Minnesota Government Data Practices Act (Minn. Stat. § 13.01) that is at issue here. Instead, this opinion addresses the Uniform Trade Secrets Act (Minn. Stat. § 325C.01) and whether an injunction should be entered when there is a misappropriation or threatened misappropriation of trade secrets. They then cite *IBM v. Seagate*, 941 F.Supp. 98 (D.Minn.1992), which similarly addressed the Minnesota Trade Secrets Act but not the Minnesota Government Data Practices Act.

Moreover, as pointed out in our March 18, 2019, and October 24, 2019 comments, the *Prairie Island* and *Rabr Malting* holdings already have been distinguished by Minnesota courts in situations where the information “would give an advantage to competitors.” *EOP-Nicollet Mall, L.L.C. v. Cty. of Hennepin*, No. 28457, 2004 WL 1161412, at *4 (Minn. T.C. May 3, 2004). In *EOP-Nicollet Mall*, for example, the Minnesota Tax Court upheld a trade secret protection, reasoning that information at issue was “highly competitive and proprietary.” In contrast, the court characterized the data in *Prairie Island* as “extremely limited, dated, and largely available to the public.” Similarly, the court noted, “In *In Rabr Malting*, in determining whether a tax court trial should be closed, the Minnesota Supreme Court did not determine whether the information sought to be protected was or was not a trade secret but remanded to the Tax Court for further proceedings.” *Id.* Here, as was the data in the *EOP-Nicollet Mall* case, our Protected Data is forward looking, affects market competition, and the prices ultimately borne by ratepayers.

The Commission's February 2020 Order was clear that it was weighing the interests under Minn. Stat. § 216B.164, that states: “The section shall at all times be construed in accordance with its intent to give the maximum possible encouragement to cogeneration and small power production consistent with protection of the ratepayers

and the public.” The Commission weighed, and considered the potential harm to the ratepayers and public in reaching its conclusion. The information at issue here was properly treated as non-public information. Under the Minnesota Data Practices Act, trade secret information is non-public. The information meets all requirements for being trade secret. The Joint Commenters only dispute whether the third element for trade secret protection has been met, namely information “... (3) that derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.” Minn. Stat. § 13.37. The potential use of this information has been properly established here.

The remaining arguments raised by the Joint Commenters on this should not change the Commission’s determination on this issue.

CONCLUSION

Xcel Energy respectfully requests the Commission deny the Environmental Law & Policy Center and Institute for Local Self Reliance PETITION FOR RECONSIDERATION.

We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. Please contact me at james.r.denniston@xcelenergy.com or 612-215-4656 if you have any questions regarding this matter.

Sincerely,

/s/

JAMES R. DENNISTON
ASSISTANT GENERAL COUNSEL

Enclosure
c: Service List



414 Nicollet Mall
Minneapolis, MN 55401

June 17, 2019

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: COMPLIANCE FILING
UPDATING GENERIC STANDARDS FOR UTILITY TARIFFS FOR
INTERCONNECTION AND OPERATION OF DISTRIBUTED GENERATION
FACILITIES ESTABLISHED UNDER MINN. STAT. §216B.1611
DOCKET NOS. E999/CI-16-521 & E999/CI-01-1023

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed compliance filing in response to the Minnesota Public Utilities Commission's March 19 2019 ORDER AUTHORIZING FURTHER PROCEEDINGS. In particular, Order Point 3 which states:

3. *Within 90 days of the date of this order, Xcel, Minnesota Power, Otter Tail Power, and Dakota Electric Association shall file detailed descriptions of how they calculate their DG tariffed rates and negotiated DG rate offerings, including how they apply Attachment 6 in those calculations, for DG projects between 1 and 10 MW.*

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Amber Hedlund at amber.r.hedlund@xcelenergy.com or (612) 337-2268 or me at holly.r.hinman@xcelenergy.com. or (612) 330-5941 if you have any questions concerning this filing.

Sincerely,

/s/

HOLLY HINMAN
REGULATORY MANAGER

Enclosures
c: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Valerie Means	Commissioner
John A. Tuma	Commissioner

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

IN THE MATTER OF UPDATING GENERIC
STANDARDS FOR UTILITY TARIFFS FOR
INTERCONNECTION AND OPERATION OF
DISTRIBUTED GENERATION FACILITIES
UNDER MINN. LAWS 2001 CH. 212

DOCKET NO. E999/CI-01-1023

COMPLIANCE FILING

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this compliance filing in response to the Minnesota Public Utilities Commission's March 19, 2019 ORDER AUTHORIZING FURTHER PROCEEDINGS. In particular the Company makes this compliance filing pursuant to Order Point 3, which states:

- 3. Within 90 days of the date of this order, Xcel, Minnesota Power, Otter Tail Power, and Dakota Electric Association shall file detailed descriptions of how they calculate their DG tariffed rates and negotiated DG rate offerings, including how they apply Attachment 6 in those calculations, for DG projects between 1 and 10 MW.*

A. DG Tariffed Rate Calculations

The Commission established generic standards for interconnection and operation of distributed generation (DG) through its Order dated September 27, 2004, which included Attachment 6. Since the issuance of the 2004 Order there have been numerous DG dockets including the Company's customer programs driven by state

policy goals. Company tariffs, including those addressing DG, are approved after a public regulatory proceeding. We believe that the rates and contract for Solar*Rewards Community, for example, are well documented and well known to the Commission through the record developed in Docket No. E002/M-13-867. Similarly, the rates for the PV Demand Credit Rider are developed in Docket No. E999/CI-15-115.

These and other dockets such as Docket Nos. E999/R-13-729 (Rules Governing Cogeneration and Small Power Production), E002/M-16-222 (Tariff Modifications Implementing Rules on Cogeneration and Small Power Production), and E999/M-14-65 (Value of Solar Methodology) include tariffed DG rates that were developed following public regulatory proceedings.

The Company’s tariffs with rates applicable to DG projects between 1 and 10 MW are identified in the table below.

Table 1. DG Tariff Rates

DG Tariff Rate	Short description	How Rate Is Developed
Tariff Sheets 9-64 through 9-110	Solar*Rewards Community – Community Solar Gardens. Available up to 1 MW (certain projects up to 5 MW were “grandfathered” into the program depending on when application was Deemed Complete and are therefore acknowledged here)	Compensation rates offered as a bill credit rate to program subscribers: either the “Applicable Retail Rate” or the Value of Solar Rate corresponding to an annual vintage. Some subscribers are also eligible to receive a residential adder. These rates arise from the regulatory proceeding in Docket No. E002/M-13-867 and are outside the 2004 Order and Attachment 6.
Tariff Sheet 10-76	One-Year Power Purchase Agreement energy rate table	Rates are developed pursuant to Minn. R. 7835 and are consistent with Attachment 6.
Tariff Sheet 5-125	PV Demand Credit Rider for greater than 40 kW	kWh-based credit for qualifying solar produced during designated on-peak times. Rates are not related to Attachment 6.

The One Year Power Purchase Agreement energy rate table is referenced on tariff sheet 10-76 consistent with the Commission’s July 14, 2006 Order and related filings in *In the Matter of Xcel Energy’s Petition for Approval of a Distributed Generation Tariff*, Docket No. E002/M-04-2055. The rates on Sheet 10-76 are calculated and updated annually in Schedule G of the January Cogeneration and Small Power Production filing. The most current filing is in Docket No. E999/PR-19-9. The content for Schedule G is developed pursuant to Minn. R. 7835 and is generally consistent with Attachment 6. Also, consistent with Minn. R. 7835, the rate calculations in Schedule G are for 5 years, while our tariff Sheet 10-76 references a one year rate.

The following table compares the provisions in Schedule G to corresponding parts of Attachment 6.

Table 2. Cogen and Small Power Production Rate

Minn. R. 7835	Attachment 6
7835.0100, Subp. 23: System incremental energy costs. "System incremental energy costs" means amounts representing the hourly energy costs associated with the utility generating the next kilowatt-hour of load during each hour.	Par. 6.a.i: System-wide hourly marginal incremental energy costs are calculated with a production model for each hour of the future year.
7835.1000: Schedule G must contain and describe all computations made by the utility in determining schedules A and B.	
7835.0500: Schedule A must contain the estimated system average incremental energy costs by seasonal peak and off-peak periods for each of the next five years. For each seasonal period, system incremental energy costs must be averaged during system daily peak hours, system daily off-peak hours, and all hours in the season. The energy costs must be increased by a factor equal to 50 percent of the line losses shown in schedule B. Schedule A must describe in detail the method used to determine the on-peak and off-peak hours and seasonal periods and must show the resulting on-peak and off-peak and seasonal hours selected.	Par. 6.a.i: Based on these costs [(referenced in Par. 6.a.i)], the average on-peak and off-peak marginal energy costs are calculated for each month.

The rates in Schedule G have limited applicability, and would not apply to a renewable energy source because Minn. Stat. §216B.164, Subd. 4, as quoted in the letter template provided as Attachment A to this filing, controls how rates for renewable energy sources are set. Also, pursuant to Minn. R. 7835.4019, enacted in 2015, parties are required to negotiate a contract to set the applicable avoided cost rates for qualifying facilities (QFs) of 1 MW or more.

7835.4019

QUALIFYING FACILITIES OF 1,000 KILOWATT CAPACITY OR MORE.

A qualifying facility with capacity of 1,000 kilowatt capacity or more must negotiate a contract with the public utility to set the applicable rates for payments to the customer of avoided capacity and energy costs. Nothing in parts 7835.4010 to 7835.4015 prevents a utility from connecting qualifying facilities of greater than 1,000 kilowatt capacity under its avoided cost rates.

B. Negotiated DG Rate between 1 and 10 MW

We use two different methods to negotiate a rate for QF projects between 1 and 10 MW. We use an RFP process and submit bid selections for Commission approval. We also offer avoided cost pricing that, depending on the type of facility, may include rates from tariff Sheet 10-76, rates informed by our least cost renewable PPA or facility, or LMP-based rates.

We have used a competitive bid RFP that resulted in the Aurora solar project. This consisted of numerous DG projects, each no more than 10 MW. This is discussed in *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Competitive Resource Acquisition Proposal and Certificate of Need*, Docket No. E002/CN-12-1240.

If a developer asks us about using the rate table at tariff sheet 10-76, we inform the developer that the rate table would not apply to a renewable energy source because, as noted above, Minn. Stat. §216B.164, Subd. 4 controls how rates for renewable energy sources are set. We also inform the developer that the rate table is only for five years, and is updated annually, with us proposing updated rates on the first business day following January 1 and if allowed these are typically made applicable beginning in April. This would result in a five year term for the PPA that relies on the rate table on Sheet 10-76. If the developer is proposing a project that is not renewable energy, once it has established a legally enforceable obligation (LEO) we can provide the developer a Confidentiality agreement to sign so that we can provide the non-public tariffed energy rate table. But, to help set expectations, as shown in the letter template, we inform the developer early on that the rates in tariff Sheet 10-76 currently are similar to the energy rates for our A52 rate code as set forth in our tariff at Sheet 9-3.

If a developer for a non-renewable energy source asks about a capacity rate, we inform the developer that, consistent with Attachment 6 and our tariff Sheets 10-77 through 10-79, the need for capacity must be established in the most recent Integrated Resource Plan, and a need exists if there is a shown deficit at any year of the 5-year planning period. Per the most recent Integrated Resource Plan (Commission Docket No. E002\RP-15-21), the Company forecasts a surplus position for system capacity and energy into 2025, and therefore there currently is no value to adding capacity prior to then. We have not been called upon to develop a negotiated capacity rate for a DG non-renewable energy source, but if called upon to do so the capacity rate would be based on our tariff Sheets 10-77 through 10-79 that were developed from Attachment 6.

When DG developers have approached us for a negotiated rate for a DG renewable energy source between 1 to 10 MW, our response is consistent with the letter template included here as Attachment A. The template letter is tailored depending on the applicable circumstances.

If interactions with the QF developer indicate that the developer may be interested in a LMP-based rate, we will also offer that. For example, we could offer an LMP-based rate structure minus an administrative fee, multiplied by the Net Energy produced by the facility.

Neither the least cost renewable energy bid rate, nor the LMP-based rate, are based on Attachment 6.

C. Process for Commission Review and Approval of DG PPAs

Our tariff on Sheet 9-8.2 provides details on the process to be followed when the Company enters into a PPA with a developer for a DG at various different nameplate capacities and term lengths. This tariff states:

DISTRIBUTED GENERATION PPAs WHERE RATE CODES A51-A56 DO NOT APPLY

If a qualifying facility (QF) has capacity of at least 40 kW AC but less than 1,000 kW AC and does not comply with the Individual System Capacity Limits, then the rate codes A51-A56 do not apply. These rate codes also do not apply, for example, where the QF or other distributed generation (DG) has a capacity of 1,000 kW AC or more. In circumstances where Rate Codes A51-A56 do not apply, then the Section 9 Uniform Statewide Contract also does not apply. Where the Section 9 Uniform Statewide Contract does not apply, the DG customer may apply for interconnection under the Company's Section 10 tariff. Whether the Company pays for energy or capacity delivered to it would depend on whether there is a power purchase agreement (PPA) and further depend on the rates, terms and conditions in the PPA. Nothing in this tariff shall be construed to obligate Company to enter into a PPA. The obligation to enter into such a PPA with a DG customer takes into consideration many factors, including whether there is a Legally Enforceable Obligation (LEO) of the Company to enter into such a PPA and the proposed rates, terms and conditions. The Company may also voluntarily enter into a PPA with a DG customer. Should a DG customer and Company enter into a PPA where the Section 9 Uniform Statewide Contract does not apply (and no other Section 9 tariffed contract applies, such as a Solar*Rewards contract), then the following procedures will apply:

1. If the DG is over 10 MW AC nameplate capacity, then the PPA along with the associated Interconnection Agreement will need to be approved by the Commission.
2. If the DG has a nameplate capacity of 40 kW up to and including 10 MW AC, and is for a term of more than 5 years, the Company shall file the PPA with the Commission and the Company shall be permitted to proceed with the PPA beginning 32 days after filing if no objection or intent to object is filed within 30 days of filing. If there is an objection or intent to object filed in this 30-day time frame, then the Commission will need to issue an order approving the PPA before the PPA is approved.
3. If the DG has a nameplate capacity of 40 kW up to and including 10 MW AC, and is for a term of 5 years or less, the Company may proceed with the PPA, but the Commission can examine the prudence of rates in the PPA during any request for rate recovery.
4. Notwithstanding the above, if the Commission has otherwise directed that a Commission order is needed for the PPA to be approved then that Commission directive shall apply.

CONCLUSION

We appreciate the opportunity to provide this compliance filing which discusses the origins of our DG tariffed and negotiated rates.

Dated: June 17, 2019

Northern States Power Company

Docket Nos. E999/CI-01-1023 & E999/CI-16-521
Attachment A - Page 1 of 4



401 Nicollet Mall
Minneapolis, MN 55401-1993

Month Day, 2019

(Via email only to:
representative@company.com)

Representative
Company
Street Address, Office Location
City, State Zip Code

Re: Unsolicited Project Inquiry

Dear Representative:

Please allow this letter to serve as an initial response to the (project inquiry/unsolicited offer of generation), addressing your questions on the process for unsolicited requests for distributed generation (DG) power purchase agreements (PPAs) in Minnesota. To help create clarity, the details in this letter go beyond some of your specific questions.

You have inquired about the process for entering into a Power Purchase Agreement (PPA) under our Section 10 tariff in Minnesota for distributed generation with a nameplate capacity above 1 MW. The Section 10 Tariff addresses distributed generation interconnection and is limited to projects of 10 MW or less. The Section 10 tariff, Sheet 73, states in pertinent part:

AVAILABILITY

Available to retail electric customers at distribution voltages and who operate a qualifying distributed generating (DG) facility, as defined below, with nameplate rating of 10,000 kW or less, which is operated in parallel with Company's distribution system.

That being said, if a DG project is larger than that allowed under our Section 10 interconnection tariff, we can still allow interconnection if engineering and other requirements are met. Please note that any eventual interconnection agreement for a project larger than 10 MW would require approval from the Minnesota Public Utilities Commission ("Commission"). An interconnection agreement would only allow interconnection and would not address compensation.

Regarding compensation, a developer must demonstrate that it has established itself as a Qualifying Facility (QF) either through making appropriate filings with the FERC, or where

applicable having a self-certification under the FERC process. This is consistent with Minn. R. 7835.4019 that requires negotiation of a contract to set the applicable avoided cost rates for qualifying facilities (QFs) of 1 MW or more.

7835.4019

QUALIFYING FACILITIES OF 1,000 KILOWATT CAPACITY OR MORE.

A qualifying facility with capacity of 1,000 kilowatt capacity or more must negotiate a contract with the public utility to set the applicable rates for payments to the customer of avoided capacity and energy costs. Nothing in parts 7835.4010 to 7835.4015 prevents a utility from connecting qualifying facilities of greater than 1,000 kilowatt capacity under its avoided cost rates.

A key factor in determining the avoided cost to be applied to a specific QF is the date that the QF established a legally enforceable obligation (LEO). The Commission has addressed some of the factors it considers in determining whether a QF project has progressed sufficiently to indicate project viability for purposes of establishing a LEO under PURPA. In *In the Matter of the Petition by Highwater Wind LLC and Gadwall Wind LLC for Resolution of a Cogeneration and Small Power Production Dispute with Minnesota Power under Minn. Stat. § 216B.164, Subd. 5*, Docket No. E015/CG-11-1073, (the *Highwater* case) the Commission's February 25, 2013 order identified several factors showing that the developer was not ready, willing, and able to make meaningful commitments to enter into a PPA because of critical obstacles to viability. These factors included the following:

1. *Performance guarantees.* Lack of performance guarantees were in place to require the project developer to pay a penalty if the project fails to progress according to schedule.
2. *Financing.* The record provided no evidence that financing had been finalized.
3. *Major parts supply.* The record provided no evidence that the developer had secured commitments for the major components (in that case for the turbines).
4. *Easements.* The record did not clearly show that the landowners would sell easements, let alone under terms and on a schedule that would make the project viable.
5. *Site permits.* No site permits had been filed, and this indicated that the project remained in its initial stage.
6. *Interconnection plans.* Progress on interconnection needs to demonstrate that the developer is ready, willing, and able to meet the obligations of a PPA.

The established LEO requirements aid in evaluating the viability of a proposal. In conjunction with the above, the minimum information necessary for the evaluation of an unsolicited proposal would include: generator location, size and type; fuel type; forecasted

energy and capacity production and frequency/timing of the energy delivery; generation interconnection type, location, and status; desired rate and terms for compensation; expected commercial operation date; and status of QF self-certification.

Once a LEO is established, this information can be used to evaluate the value of the proposed project and either accept it or make a counter-offer. The avoided cost pricing for a renewable energy source would then be based on Minn. Stat. § 216B.164, that provides in pertinent part:

Subd. 4. Purchases; wheeling; costs. (a) ... this subdivision shall apply to all qualifying facilities having ... 1,000-kilowatt capacity or more if interconnected to a public utility, which elect to be governed by its provisions.

(b) The utility to which the qualifying facility is interconnected shall purchase all energy and capacity made available by the qualifying facility. The qualifying facility shall be paid the utility's full avoided capacity and energy costs as negotiated by the parties, as set by the commission, or as determined through competitive bidding approved by the commission. The full avoided capacity and energy costs to be paid a qualifying facility that generates electric power by means of a renewable energy source are the utility's least cost renewable energy facility or the bid of a competing supplier of a least cost renewable energy facility, whichever is lower

The Company provides some guidance to help set expectations. As a general matter, we believe that the avoided cost for renewable energy on our system would not be higher than recent RFP pricing for renewable projects. This is based on the statute and also because our avoided cost calculated for purposes of entering into a new renewable PPA should not be higher than the actual bid cost for entering into a renewable PPA. NSP issued a wind energy RFP in 2016, and more than 30 responses were below \$22/MWh on a Levelized Cost of Energy basis. Accordingly, once a LEO has been established, and compliance with size limits are met, the developer of a renewable QF project should expect pricing below the \$22/MWh level. More specific cost detail can be provided once a LEO has been established and other relevant information has been provided.

The above discussion focuses on PPAs above 1 MW. The Company notes that FERC has been authorized by statute to terminate a utility's duty to enter into new purchase obligations under PURPA and may terminate the utility's purchase obligation where it finds that the QFs in the utility's service territory have nondiscriminatory access to sell electricity into a viable wholesale electricity market. (16 U.S. C. § 824a-3(m)). FERC has established by rule a rebuttable presumption that a QF having capacity exceeding 20 MW within MISO's service territory has non-discriminatory access to the wholesale electric markets. (18 C.F.R. § 292.309(e)). Consistent with this, FERC has issued an order terminating the duty of Northern States Power Company, as of May 12, 2011, to form new LEOs with QFs having a net capacity greater than 20 MW. (*Northern States Power Company, a Minnesota corporation,*

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Docket No. QM11-3-000, Order Granting Application to Terminate Purchase Obligation,
136 FERC ¶ 61,093 (2011)).

Hopefully the above discussion is helpful to you in understanding the PPA process in
Minnesota and in setting expectations.

Sincerely,

First Last Name

Xcel Energy

Director, Resource Planning

Office: 612-XXX-XXXX

director.of.resource.planning@xcelenergy.com

CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

**Docket Nos. E999/CI-01-1023
 E999/CI-16-521**

Dated this 17th day of June 2019

/s/

Lynnette Sweet
Regulatory Administrator

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sam	Villella	sdvillella@gmail.com		10534 Alamo Street NE Blaine, MN 55449	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sarah	Walinga	swalinga@solarcity.com	Energy Freedom Coalition	3055 Clearview Way San Mateo, MN 94402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jenna	Warmuth	rwarmuth@minpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Elizabeth	Wefel	eawefe@flaherty-hood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John	Williamson	John.Williamson@state.mn.us	Minnesota Department of Labor and Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Danielle	Winner	danielle.winner@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_16-521_Official Service List PUC
Thomas J.	Zaremba	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota;

xx electronic filing

Docket No. E999/PR-19-9

Dated this 23rd day of March 2020

/s/

Lynnette Sweet
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_19-9_PR-19-9
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St Denver, CO 80204-8020	Electronic Service	No	OFF_SL_19-9_PR-19-9
Mark	Anderson	manderson@southcentralelectric.com	South Central Electric Association	PO Box 150 71176 Tiell Drive St. James, MN 56081	Electronic Service	No	OFF_SL_19-9_PR-19-9
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-9_PR-19-9
Sara	Baldwin Auck	sarab@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156 Latham, NY 12110	Electronic Service	No	OFF_SL_19-9_PR-19-9
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-9_PR-19-9
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_19-9_PR-19-9
Becky	Bradburn	b.bradburn@bcrea.coop	Brown County Rural Electric Assn.	PO Box 529 Sleepy Eye, MN 56085	Electronic Service	No	OFF_SL_19-9_PR-19-9
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-9_PR-19-9
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-9_PR-19-9

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kathleen M.	Brennan	kmb@mcgrannshea.com	McGrann Shea Carnival, Straughn & Lamb, Chartered	800 Nicollet Mall Ste 2600 Minneapolis, MN 554027035	Electronic Service	No	OFF_SL_19-9_PR-19-9
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-9_PR-19-9
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-9_PR-19-9
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-9_PR-19-9
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-9_PR-19-9
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_19-9_PR-19-9
Pat	Carruth	pat@mnvalleyrec.com	Minnesota Valley Coop. Light & Power Assn.	501 S 1st St. PO Box 248 Montevideo, MN 56265	Electronic Service	No	OFF_SL_19-9_PR-19-9
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_19-9_PR-19-9
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-9_PR-19-9
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-9_PR-19-9

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Solar	14333 Orchard Rd. Minnetonka, MN 55345	Electronic Service	No	OFF_SL_19-9_PR-19-9
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_19-9_PR-19-9
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_19-9_PR-19-9
James	Darabi	james.darabi@solarfarm.com	Solar Farm, LLC	2355 Fairview Ave #101 St. Paul, MN 55113	Electronic Service	No	OFF_SL_19-9_PR-19-9
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-9_PR-19-9
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_19-9_PR-19-9
Robin	Doege	Rdoege@stearselectric.org	Stearns Electric Association	PO Box 40 Melrose, MN 56352-0040	Electronic Service	No	OFF_SL_19-9_PR-19-9
Kristin	Dolan	kdolan@meeker.coop	Meeker Cooperative Light & Power Assn	1725 US Hwy 12 E. Ste 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_19-9_PR-19-9
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_19-9_PR-19-9

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-9_PR-19-9
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-9_PR-19-9
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-9_PR-19-9
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-9_PR-19-9
Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192 Park Rapids, MN 56470	Electronic Service	No	OFF_SL_19-9_PR-19-9
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-9_PR-19-9
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_19-9_PR-19-9
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-9_PR-19-9
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_19-9_PR-19-9

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sarah	Groebner	sgroebner@redwoodelectri c.com	Redwood Electric Cooperative	60 Pine St Clements, MN 56224	Electronic Service	No	OFF_SL_19-9_PR-19-9
Timothy	Gulden	timothy.gulden@yahoo.co m	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	OFF_SL_19-9_PR-19-9
Tony	Hainault	anthony.hainault@co.henn epin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_19-9_PR-19-9
James	Haler	jhaler@southcentralelectri .com	South Central Electric Association	71176 Tiell Dr P. O. Box 150 St. James, MN 56081	Electronic Service	No	OFF_SL_19-9_PR-19-9
Jeffrey	Hammons	jhammons@elpc.org		35 East Wacker Dr Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_19-9_PR-19-9
Jared	Hendricks	jared.hendricks@owatonna utilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_19-9_PR-19-9
Michael	Henke	mhenke@peoplesrec.com	People's Energy Cooperative	1775 Lake Shady Avenue South Oronoco, MN 55960	Electronic Service	No	OFF_SL_19-9_PR-19-9
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-9_PR-19-9
Ronald	Horman	rhorman@redwoodelectric. com	Redwood Electric Cooperative	60 Pine Street Clements, MN 56224	Electronic Service	No	OFF_SL_19-9_PR-19-9
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_19-9_PR-19-9

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_19-9_PR-19-9
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_19-9_PR-19-9
Brian	Jeremiason	bjeremiason@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.	205 W. Hwy. 14 Tyler, MN 56178	Electronic Service	No	OFF_SL_19-9_PR-19-9
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-9_PR-19-9
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_19-9_PR-19-9
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_19-9_PR-19-9
Kevin	Keene	kevin.keene@cummins.com		N/A	Electronic Service	No	OFF_SL_19-9_PR-19-9
Jack	Kegel	jkegel@mmua.org	MMUA	3025 Harbor Lane N Suite 400 Plymouth, MN 55447-5142	Electronic Service	No	OFF_SL_19-9_PR-19-9
Becky	Kern	bkern@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	OFF_SL_19-9_PR-19-9
Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave Ste 200 Lakeville, MN 55044	Paper Service	No	OFF_SL_19-9_PR-19-9

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_19-9_PR-19-9
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_19-9_PR-19-9
Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power	1725 US Hwy 12 E Litchfield, MN 55355	Electronic Service	No	OFF_SL_19-9_PR-19-9
Jon	Kramer	sundialjon@gmail.com	Sundial Solar	3209 W 76th St Edina, MN 55435	Electronic Service	No	OFF_SL_19-9_PR-19-9
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_19-9_PR-19-9
Jeffrey L.	Landsman	jlandsman@wheelerlaw.com	Wheeler, Van Sickle & Anderson, S.C.	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_19-9_PR-19-9
Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn	1725 Highway 12 E Ste 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_19-9_PR-19-9
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Wayzata, MN 55391	Electronic Service	No	OFF_SL_19-9_PR-19-9
Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products	PO Box 108 Springfield, MN 56087	Electronic Service	No	OFF_SL_19-9_PR-19-9

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_19-9_PR-19-9
John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_19-9_PR-19-9
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_19-9_PR-19-9
Tim	Mergen	tmergen@meeker.coop	Meeker Cooperative Light And Power	1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield, MN 55355	Electronic Service	No	OFF_SL_19-9_PR-19-9
Alan	Miller	N/A		2210 20th St NE Stewartville, MN 55976	Paper Service	No	OFF_SL_19-9_PR-19-9
Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-9_PR-19-9
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-9_PR-19-9
Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_19-9_PR-19-9

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Andrew	Moratzka	andrew.moratzka@stoel.com	Steel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-9_PR-19-9
Tony	Nelson	tnelson@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192 Park Rapids, MN 56470	Electronic Service	No	OFF_SL_19-9_PR-19-9
Ben	Nelson	benn@cmpasgroup.org	CMPMA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_19-9_PR-19-9
Dale	Niezwaag	dniezwaag@bepec.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503	Electronic Service	No	OFF_SL_19-9_PR-19-9
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-9_PR-19-9
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-9_PR-19-9
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_19-9_PR-19-9
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_19-9_PR-19-9
Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc	P.O. Box 639 Tyler, MN 561780639	Electronic Service	No	OFF_SL_19-9_PR-19-9

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_19-9_PR-19-9
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_19-9_PR-19-9
Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-9_PR-19-9
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_19-9_PR-19-9
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_19-9_PR-19-9
Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-9_PR-19-9
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_19-9_PR-19-9
Mark	Rathbun	mrathbun@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-9_PR-19-9
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-9_PR-19-9
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_19-9_PR-19-9

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-9_PR-19-9
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_19-9_PR-19-9
Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electric Assn.	PO Box 529 24386 State Highway 4 Sleepy Eye, MN 56085	Electronic Service	No	OFF_SL_19-9_PR-19-9
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_19-9_PR-19-9
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-9_PR-19-9
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-9_PR-19-9
Kenric	Scheevel	Kenric.scheevel@dairylandpower.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, Wisconsin 54602	Electronic Service	No	OFF_SL_19-9_PR-19-9
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_19-9_PR-19-9
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_19-9_PR-19-9

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Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Cooperative Electric	22636 U.S. Hwy. 59 Worthington, MN 56187	Electronic Service	No	OFF_SL_19-9_PR-19-9
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_19-9_PR-19-9
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-9_PR-19-9
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_19-9_PR-19-9
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-9_PR-19-9
Esther	Simon	esimon@itasca-mantrap.com	Itasca-Mantrap Cooperative	PO Box 192 Park Rapids, MN 56470	Electronic Service	No	OFF_SL_19-9_PR-19-9
Felicia	Skaggs	fskaggs@meekeer.coop	Meekeer Cooperative Light & Power	1725 US Highway 12 E Suite 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_19-9_PR-19-9
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-9_PR-19-9
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_19-9_PR-19-9

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Marcia	Solie	m.solie@bcreea.coop	Brown County Rural Electrical Assn.	24386 State Hwy. 4, PO Box 529 Sleepy Eye, Minnesota 56085	Electronic Service	No	OFF_SL_19-9_PR-19-9
Robyn	Sonstegard	robynnsec@wiktel.com	North Star Electric Cooperative, Inc.	PO Box 719 441 State Hwy 172 NW Baudette, MN 56623	Electronic Service	No	OFF_SL_19-9_PR-19-9
Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric	22636 US Highway 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_19-9_PR-19-9
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-9_PR-19-9
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