

August 1, 2022

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-18-714

Dear Mr. Seuffert:

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

In the Matter of Xcel Energy's Compliance Filing Regarding a Cost Sharing Implementation Plan and Tariff Interconnection Standards for Distributed Generation

The Cost-Sharing Proposal was filed on May 27, 2022, by:

Jessica Peterson
Manager, Program and Strategy
Xcel Energy

The Department **recommends approval of Xcel Energy's Cost-Sharing Proposal with modifications** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ WILL NISSEN
Public Utilities Rates Analyst



Before the Minnesota Public Utilities Commission

Reply Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-18-714

I. INTRODUCTION

On March 31, 2022, the Minnesota Public Utilities Commission (Commission) issued its ORDER MODIFYING PRACTICES AND SETTING REPORTING REQUIREMENTS.¹ Order Point 10 required Xcel Energy (Xcel or the Company) to file an interconnection cost-sharing proposal for Xcel customers with less than 40 kW distributed generation projects within 60 days of the Order, for implementation by August 31, 2022. The Commission capped the level of individual upgrade costs at \$15,000.

On May 27, 2022, Xcel filed its cost-sharing proposal (Filing).

On June 3, 2022, the Commission issued a notice of comment period.

On July 21, 2022, the Minnesota Department of Commerce, Division of Energy Resources (Department), Fresh Energy, Minnesota Solar Energy Industries Association (MNSEIA), All Energy Solar, and Solar United Neighbors, Vote Solar, the Institute for Local Self-Reliance, and the City of Minneapolis (collectively Solar Groups) filed comments in response to the Commission's notice.

The Department provides the following response to party comments and updated recommendations to the Commission.

II. ISSUES RAISED BY PARTIES

The parties mentioned above raised a number of issues related to the Cost Sharing Fund proposed by Xcel in the instant docket. The Department addresses and assesses specific issues below.

¹ *In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established under Minn. Stat. §216B.1611*, ORDER MODIFYING PRACTICES AND SETTING REPORTING REQUIREMENTS, March 31, 2022, Docket E999/CI-16-521.

Cost Sharing Fund Balance

Several parties raised issues related to the ability of the Cost Sharing Fund to grow quickly enough to provide value to customers ready to install solar in the near-future,² requiring Xcel to spend the fund at a deficit,³ and refunding the \$200 Cost Sharing Fund fee for incomplete interconnection applications.⁴ As stated in our July 21, 2022 comments, the Department shares concerns about the Cost Sharing Fund's ability to grow quickly enough in the near-term without seed funding of some kind. However, the Department does not support using Xcel funds from non-participating ratepayers to seed the fund or spending the fund at a deficit. In addition, refunding incomplete interconnection applications could further limit the Cost Sharing Fund's ability to grow at a level necessary to provide the intended value to solar customers facing significant interconnection costs.

Several parties proposed solutions that the Department agrees could alleviate some of the abovementioned concerns without impacting non-participating ratepayers: 1) delaying implementation of the Cost Sharing Fund from the proposed August 31, 2022 start date to January 1, 2023 to align with the increased solar application activity in the Solar*Rewards program,⁵ and 2) adding a waitlist option for customers who face interconnection costs greater than the amount available in the fund at the time of their application process.⁶ While delaying implementation does not alleviate the urgency to deploy distributed energy resources raised by Solar Groups, the Department notes Xcel's concern that the 2022 Solar*Rewards incentives were depleted at the end of May 2022, indicating that "there will not be sufficient volumes of applications to build a reserve of funds upon which to draw for projects requiring significant upgrades"⁷ for the rest of the 2022 Solar*Rewards program year (a point also noted by Fresh Energy). Regarding the waitlist recommendation, customers would still have the option of withdrawing their application or paying the remaining necessary interconnection costs themselves to move forward in the interconnection process.

The Department supports delaying implementation of the Cost Sharing Fund until January 1, 2023 and establishing a waitlist option for projects requiring upgrades that exceed the balance available in the Cost Sharing Fund.

Eligible Program Costs

MNSEIA recommended limiting eligible program costs to be covered by the Cost Sharing Fund, specifically citing Xcel's proposal to include costs due to "tree trimming, traffic control, restoration,

² Solar Groups Comments, page 5-6.

³ Solar Groups Comments, page 6. All Energy Solar Comments, page 2.

⁴ MNSEIA Comments, page 4. All Energy Solar Comments, page 1.

⁵ Fresh Energy Comments, pages 4-5. MNSEIA Comments, page 4.

⁶ Fresh Energy Comments, page 5. MNSEIA Comments, page 4. All Energy Solar Comments, page 2.

⁷ Xcel Filing. Page 7.

winter construction, etc.”⁸ MNSEIA stated that these costs are outside the scope of the intent of the fund and are generally considered costs that Xcel would be expected to incur during regular grid management and safety efforts. All Energy Solar did not recommend limiting these types of costs, but stated that any costs related to tree trimming, traffic control, restoration, or winter construction that may be necessary during interconnection upgrades “should be presented in an itemized breakdown of the facility upgrade costs.”⁹

Generally, the Department has concerns when program-specific cost recovery includes actions by the utility that are typically included broadly in base rates (e.g., administrative labor costs). The costs cited by MNSEIA and All Energy Solar could be considered typical actions taken by the utility in its normal course of business and covered by revenues recovered in base rates. However, in this case, the Department determines that costs incurred by the abovementioned activities could be incremental to general costs recovered through base rates if they are directly caused by upgrades needed due to a specific solar project. Because this is a new program, the Department finds value in requiring Xcel to report costs incurred related to “tree trimming, traffic control, restoration, winter construction, etc.” to demonstrate that these are incremental costs incurred due to the interconnection process.

The Department recommends that the Commission require Xcel to include in its annual compliance filings all costs related to tree trimming, traffic control, restoration, winter construction and any other work done as general upgrade costs.

Low-Income Customer Exemption

Solar Groups recommended that “homeowners qualifying for energy assistance and those who are receiving Xcel income-qualified Solar*Rewards should not pay into the Cost Sharing Fund” due to the large burden of the \$200 fee on those customers.¹⁰ To the extent that low-income homeowners pursue solar projects, the Department finds value in limiting the financial burden placed on those customers provided that these customers do not represent a significant percentage of total projects under 40 kW entering the interconnection queue and contributing to the fund.

The Department recommends that the Commission exempt homeowners that qualify for energy assistance and those that are receiving Xcel income-qualified Solar*Rewards from the Cost Sharing Fund fee and require Xcel to report the number customers under this exemption in its program compliance filings.

⁸ MNSEIA Comments, pages 4-5.

⁹ All Energy Solar Comments, page 1.

¹⁰ Solar Groups Comments, pages 6-7.

Accounting Considerations

Solar Groups generally stated that separate accounting will be necessary to ensure that expenses covered by the Cost Sharing Fund are not included in Xcel's rates.¹¹ The Department agrees that none of the costs covered by the Cost Sharing Fund should be included in Xcel's rates or revenue requirements, which is consistent with the Department's standard practices when tracking and reviewing utility accounting in rate case proceedings.

III. CONCLUSIONS AND RECOMMENDATIONS

The Department appreciates the insights and recommendations submitted by parties in the instant docket. The Department continues to recommend that the Commission approve the Cost Sharing Fund proposal with the additional reporting requirements proposed in our July 21, 2022 comments, as well as the recommendations from other parties discussed above.

The Department recommends that the Commission approve Xcel's interconnection cost sharing proposal for projects less than 40 kW, including the 30-day negative checkoff process for tariff modifications, with the following modifications:

- Delay implementation of the Cost Sharing Fund until January 1, 2023.
- Add a waitlist option in which the customer can wait for the Cost Sharing Fund balance to reach a level necessary to cover required upgrade costs.
- Exempt homeowners that qualify for energy assistance and those that are receiving Xcel income-qualified Solar*Rewards from the Cost Sharing Fund fee.
- In addition to the reporting metrics included in Xcel's May 27, 2022 Filing, require that the Company also include the following metrics in its program reporting filings:
 - The number of interconnection applications less than 40 kW deemed complete;
 - the total amount of fees received;
 - the number of projects with interconnection costs paid by the fund, and the interconnection costs from those projects;
 - the number of projects for which funds were not available, either in whole or in part, the amount of the fund shortfall, and whether the customer chose to withdraw the project or pay the shortfall amount;
 - the number of projects reaching the cost cap of \$15,000;

¹¹ Solar Groups Comments, page 7.

- total number of low-income customers exempted from the fund fee;
- total costs associated with tree trimming, traffic control, restoration, winter construction, and any other work done as general upgrade costs; and,
- an evaluation of whether an adjustment to the \$200 interconnection fee is warranted.

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce
Reply Comments

Docket No. E002/M-18-714

Dated this **1st** day of **August 2022**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	ross.abbey@us-solar.com	United States Solar Corp.	100 North 6th St Ste 222C Minneapolis, MN 55403	Electronic Service	No	OFF_SL_18-714_M-18-714
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_18-714_M-18-714
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St Denver, CO 80204-8020	Electronic Service	No	OFF_SL_18-714_M-18-714
Janet	Anderson	jainstp@q.com	-	1799 Sargent St. Paul, MN 55105	Electronic Service	No	OFF_SL_18-714_M-18-714
Christine	Andrews	christineandrewsjd@gmail.com		792 Goodrich Ave St Paul, Minnesota 55105	Electronic Service	No	OFF_SL_18-714_M-18-714
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_18-714_M-18-714
John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance	1313 5th St SE Ste 303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_18-714_M-18-714
Mark	Bakk	mbakk@lcp.coop	Lake Country Power	26039 Bear Ridge Drive Cohasset, MN 55721	Electronic Service	No	OFF_SL_18-714_M-18-714
Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_18-714_M-18-714
Jeff	Benson	jbenson@southcentralelectric.com	South Central Electric Association	PO Box 150 71176 Tiell Drive St. James, MN 56081	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	OFF_SL_18-714_M-18-714
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_18-714_M-18-714
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714
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_18-714_M-18-714
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jerry	Byer	jbyer@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192 Park Rapids, MN 56470	Electronic Service	No	OFF_SL_18-714_M-18-714
Daniel T	Carlisle	todd-wad@toddwadena.coop	Todd-Wadena Electric Cooperative	550 Ash Ave NE PO Box 431 Wadena, MN 56482	Electronic Service	No	OFF_SL_18-714_M-18-714
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-714_M-18-714
Curtis	Cordt	ccordt@mvec.net	Minnesota Valley Electric Cooperative	125 Minnesota Valley Electric Drive Jordan, MN 55352	Electronic Service	No	OFF_SL_18-714_M-18-714
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_18-714_M-18-714
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_18-714_M-18-714
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_18-714_M-18-714
James	Darabi	james.darabi@solarfarm.com	Solar Farm, LLC	2355 Fairview Ave #101 St. Paul, MN 55113	Electronic Service	No	OFF_SL_18-714_M-18-714
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-714_M-18-714
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_18-714_M-18-714
Cheryl	Dietrich	cheryl.dietrich@nexteraenergy.com	NextEra Energy Resources, LLC	700 Universe Blvd E1W/JB Juno Beach, FL 33408	Electronic Service	No	OFF_SL_18-714_M-18-714
Robin	Doege	Rdoege@stearnsselectric.org	Stearns Electric Association	PO Box 40 Melrose, MN 56352-0040	Electronic Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_18-714_M-18-714
Renee	Doyle		Doyle Electric Inc.	PO Box 295 Amboy, MN 56010	Paper Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_18-714_M-18-714
R. Neal	Elliot	RNElliott@aceee.org	American Council for an Energy-Efficient Economy	ACEEE 529 14th St NW Ste 600 Washington, DC 20045	Electronic Service	No	OFF_SL_18-714_M-18-714
Nadav	Enbar	nenbar@epri.com	EPRI	1117 Quince Ave Boulder, CO 80304	Electronic Service	No	OFF_SL_18-714_M-18-714
Betsy	Engelking	betsy@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714
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_18-714_M-18-714
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_18-714_M-18-714
Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192 Park Rapids, MN 56470	Electronic Service	No	OFF_SL_18-714_M-18-714
Mike	Franklin	mfranklin@mncef.com	MN Conservative Energy Forum	235 E 6th St Fifth Floor St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_18-714_M-18-714
David	Freestate	dfreestate@epri.com	EPRI	942 Corridor Park Blvd Knoxville, TN 37932	Electronic Service	No	OFF_SL_18-714_M-18-714
Katelyn	Frye	kfrye@mnpower.com	Minnesota Power	30 W Superiot St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-714_M-18-714
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_18-714_M-18-714
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-714_M-18-714
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_18-714_M-18-714
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_18-714_M-18-714
Nitzan	Goldberger	n.goldberger@energystorage.org	Energy Storage Association	1800 M Street NW Suite 400S Washington, DC 20036	Electronic Service	No	OFF_SL_18-714_M-18-714
Sarah	Groeber	sgroeber@redwoodelectric.com	Redwood Electric Cooperative	60 Pine St Clements, MN 56224	Electronic Service	No	OFF_SL_18-714_M-18-714
Tom	Guttormson	Tom.Guttormson@connexusenergy.com	Connexus Energy	14601 Ramsey Blvd Ramsey, MN 55303	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_18-714_M-18-714
James	Haler	jhaler@southcentralelectric .com	South Central Electric Association	71176 Tiell Dr P. O. Box 150 St. James, MN 56081	Electronic Service	No	OFF_SL_18-714_M-18-714
Donald	Hanson	dfhanson@ieee.org	Solar Photovoltaic Systems	P. O. Box 44579 Eden Prairie, MN 55344	Electronic Service	No	OFF_SL_18-714_M-18-714
John	Harlander	john.c.harlander@xcelener gy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_18-714_M-18-714
Adam	Heinen	aheinen@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_18-714_M-18-714
Jared	Hendricks	jared.hendricks@owatonna utilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_18-714_M-18-714
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_18-714_M-18-714
Ryan	Hentges	ryanh@mvec.net	Minnesota Valley Electric Cooperative	125 Minnesota Valley Electric Dr Jordan, MN 55352	Electronic Service	No	OFF_SL_18-714_M-18-714
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_18-714_M-18-714
Ronald	Horman	rhorman@redwoodelectric. com	Redwood Electric Cooperative	60 Pine Street Clements, MN 56224	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_18-714_M-18-714
Dean	Hunter	Dean.Hunter@state.mn.us	Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_18-714_M-18-714
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_18-714_M-18-714
Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue Saint Paul, Minnesota 55104	Electronic Service	No	OFF_SL_18-714_M-18-714
John S.	Jaffray	jjaffray@jjrpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_18-714_M-18-714
Robert	Jagus	rjagus@mmua.org	MMUA	3025 Harbor Lane N Minneapolis, MN 55447	Electronic Service	No	OFF_SL_18-714_M-18-714
Chris	Jarosch	chris@carrcreekelectricser vice.com	Carr Creek Electric Service, LLC	209 Sommers Street North Hudson, WI 54016	Electronic Service	No	OFF_SL_18-714_M-18-714
Brian	Jeremiason	bjeremiason@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.	205 W. Hwy. 14 Tyler, MN 56178	Electronic Service	No	OFF_SL_18-714_M-18-714
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-714_M-18-714
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mahmoud	Kabalan	mahmoud.kabalan@stthomas.edu	University of St Thomas	2115 Summit Ave. Mail OSS100 School of Engineering Saint Paul, MN 55105	Electronic Service	No	OFF_SL_18-714_M-18-714
Camille	Kadoch	ckadoch@raponline.org	Regulatory Assistance Project	50 State Street Suite 3 Montpelier, VT 05602	Electronic Service	No	OFF_SL_18-714_M-18-714
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_18-714_M-18-714
Jack	Kegel	jkegel@mmua.org	MMUA	3025 Harbor Lane N Suite 400 Plymouth, MN 55447-5142	Electronic Service	No	OFF_SL_18-714_M-18-714
Tom	Key	tkey@epri.com	EPRI	942 Corridor Park Blvd Knoxville, TN 37932	Electronic Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_18-714_M-18-714
Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power	1725 US Hwy 12 E Litchfield, MN 55355	Electronic Service	No	OFF_SL_18-714_M-18-714
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_18-714_M-18-714
Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn	1725 Highway 12 E Ste 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_18-714_M-18-714
Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar	3209 W. 76th St #305 Edina, MN 55435	Electronic Service	No	OFF_SL_18-714_M-18-714
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200 Wayzata, MN 55391	Electronic Service	No	OFF_SL_18-714_M-18-714
Nick	Lenssen	lenssen.nick@gmail.com		1195 Albion Way Boulder, CO 80305	Electronic Service	No	OFF_SL_18-714_M-18-714
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-714_M-18-714
Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-714_M-18-714
Carl	Linville	clinville@raponline.org	Regulatory Assistance Project	50 State Street Suite #3 Montpelier, VT 05602	Electronic Service	No	OFF_SL_18-714_M-18-714
Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products	PO Box 108 Springfield, MN 56087	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_18-714_M-18-714
William	Lovelace	wlovelace@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_18-714_M-18-714
Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156 Latham, NY 12110-1156	Electronic Service	No	OFF_SL_18-714_M-18-714
Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.	10710 Town Square Dr NE Ste 201 Minneapolis, MN 55449	Electronic Service	No	OFF_SL_18-714_M-18-714
Alex	Magerko	amagerko@epri.com	EPRI	942 Corridor Park Blvd Knoxville, TN 37932	Electronic Service	No	OFF_SL_18-714_M-18-714
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-714_M-18-714
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200 Minneapolis, MN 55420	Electronic Service	No	OFF_SL_18-714_M-18-714
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 Saint Paul, MN 55104-1850	Electronic Service	No	OFF_SL_18-714_M-18-714
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_18-714_M-18-714
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_18-714_M-18-714
Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_18-714_M-18-714
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-714_M-18-714
Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_18-714_M-18-714
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-714_M-18-714
Ben	Nelson	benn@cmpasgroup.org	CMPMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_18-714_M-18-714
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-714_M-18-714
Michael	Noble	noble@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-714_M-18-714
Rolf	Nordstrom	rnordstrom@gpsd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_18-714_M-18-714
Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc	P.O. Box 639 Tyler, MN 561780639	Electronic Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_18-714_M-18-714
Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_18-714_M-18-714
Bethany	Owen	bowen@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_18-714_M-18-714
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714
Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company	PO Box 496 215 S. Cascade St. Fergus Falls, MN 565370496	Electronic Service	No	OFF_SL_18-714_M-18-714
Susan	Peirce	Susan.Peirce@state.mn.us	Department of Commerce	85 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeff M	Peters	jeff.peters@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, MN 57109-8920	Electronic Service	No	OFF_SL_18-714_M-18-714
Donna	Pickard	dpickardgsss@gmail.com	Genie Solar Support Services	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	OFF_SL_18-714_M-18-714
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_18-714_M-18-714
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_18-714_M-18-714
Michael	Reinertson	michael.reinertson@avanteenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-714_M-18-714
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714
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_18-714_M-18-714
Heidi	Ries	hries@umn.edu	University of Minnesota	Institute on the Environment ,	Electronic Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_18-714_M-18-714
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714
Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP	1580 Lincoln St Ste 880 Denver, CO 80203	Electronic Service	No	OFF_SL_18-714_M-18-714
Jeff	Schoenecker	jschoenecker@dakotaelectric.com	Dakota Electric Association	4300 220th Street W Farmington, MN 55024	Electronic Service	No	OFF_SL_18-714_M-18-714
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_18-714_M-18-714
Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Cooperative Electric	22636 U.S. Hwy. 59 Worthington, MN 56187	Electronic Service	No	OFF_SL_18-714_M-18-714
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-714_M-18-714
Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_18-714_M-18-714
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_18-714_M-18-714
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_18-714_M-18-714
Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power	1725 US Highway 12 E Suite 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_18-714_M-18-714
Glen	Skarbakka	glen@s-pllc.com	Skarbakka PLLC	5411 Bartlett Blvd Mound, MN 55364	Electronic Service	No	OFF_SL_18-714_M-18-714
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-714_M-18-714
Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_18-714_M-18-714
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_18-714_M-18-714
Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Assn.	24386 State Hwy. 4, PO Box 529 Sleepy Eye, Minnesota 56085	Electronic Service	No	OFF_SL_18-714_M-18-714
Robyn	Sonstegard	robyn.s@northstarelectric.coop	North Star Electric Cooperative, Inc.	PO BOX 719 Baudette, MN 56623	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_18-714_M-18-714
Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric	22636 US Highway 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_18-714_M-18-714
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-714_M-18-714
Bryant	Tauer	btauer@whe.org	Wright-Hennepin	6800 Electric Dr Rockford, MN 55373	Electronic Service	No	OFF_SL_18-714_M-18-714
Peter	Teigland	pteigland@mnseia.org	Minnesota Solar Energy Industries Association	2288 University Ave W Saint Paul, MN 55114	Electronic Service	No	OFF_SL_18-714_M-18-714
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_18-714_M-18-714
Jeff	Triplett	triplettj@powersystem.org	MREA	10710 Town Square Dr NW St 201 Minneapolis, MN 55449	Electronic Service	No	OFF_SL_18-714_M-18-714
Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric	22636 US Hwy. 59 P.O. Box 788 Worthington, MN 56187-0788	Electronic Service	No	OFF_SL_18-714_M-18-714
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_18-714_M-18-714
Craig	Turner	cturner@dakotaelectric.com	Dakota Electric Association	4300 - 220th Street West Farmington, MN 550249583	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_18-714_M-18-714
Sam	Villella	sdvillella@gmail.com		10534 Alamo Street NE Blaine, MN 55449	Electronic Service	No	OFF_SL_18-714_M-18-714
Sarah	Walinga	swalinga@solarcity.com	Energy Freedom Coalition	3055 Clearview Way San Mateo, MN 94402	Electronic Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities	208 S Walnut Ave PO BOX 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_18-714_M-18-714
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_18-714_M-18-714
Elizabeth	Wefel	eawefel@flaherty-hood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_18-714_M-18-714
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_18-714_M-18-714
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_18-714_M-18-714
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_18-714_M-18-714