



414 Nicollet Mall
Minneapolis, MN 55401

August 1, 2022

—Via Electronic Filing—

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

RE: REPLY COMMENTS – COST SHARING IMPLEMENTATION PLAN AND TARIFF
IMPLEMENTATION OF TARIFF ON INTERCONNECTION STANDARDS FOR
DISTRIBUTED GENERATION
DOCKET NO. E002/M-18-714

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments to the Minnesota Public Utilities Commission into Comments submitted on July 21, 2022. We offer this Reply in response to questions and suggestions for implementation of our Cost Sharing Proposal submitted on May 27, 2022.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service lists. Please contact Angela Smelser at angela.r.smelser@xcelenergy.com or (612) 370-3447 if you have any questions regarding this filing.

Sincerely,
/s/

JESSICA PETERSON
MANAGER, PROGRAM AND STRATEGY

Enclosures
c: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Joseph Sullivan
Valerie Means
Matthew Schuerger
John A. Tuma

Chair
Vice-Chair
Commissioner
Commissioner
Commissioner

IN THE MATTER OF XCEL ENERGY'S
TARIFF REVISIONS UPDATING
INTERCONNECTION STANDARDS FOR
DISTRIBUTED GENERATION
FACILITIES ESTABLISHED UNDER MINN.
STAT. §216B.1611

E002/M-18-714

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this Reply in response to Comments filed by parties on or before July 21, 2022 on our Cost Sharing Proposal. The following parties provided Comments: Minnesota Department of Commerce, All Energy Solar, Fresh Energy, MnSEIA, Rick Grauger, and Solar United Neighbors, Vote Solar, The Institute for Local Self-Reliance and the City of Minneapolis.

We appreciate the Department's recommended approval of our Cost Sharing Proposal. The Company also believes that this cost-causing approach limited to Distributed Energy Generation projects 40 kW_{AC} or less, will provide an additional option to customers facing high interconnection costs while guarding against further rate impact of Distributed Energy Resources (DER) to non-participating customers. The Company is not supportive of the proposals presented by Commenters but will provide continued reporting on the methodology presented so that we can continue to review and modify over time as necessary.

The Commission approved, in its March 31, 2022 Order (March 31 Order), direction to the Company for a cost sharing proposal for small DER, behind the meter projects intended to reduce risk to customers who have considered a small on-site DER solution that triggers a distribution upgrade, while also protecting all Xcel Energy

customers from costs associated with interconnection upgrades.¹ The approved proposal originated from Fresh Energy, All Energy Solar, and TruNorth Solar, as filed in Docket No. E999/CI-16-521 on August 25, 2021 (Original Proposal).² Using this Original Proposal as the starting point, the Company outlined details of a cost-sharing program that we could efficiently administer. We also continued discussions with Fresh Energy and All Energy Solar to further develop our implementation plan.³ To vet our Proposal with a broader audience prior to filing, we also presented on our proposal at the Minnesota DER Working group, held on May 19, 2022. Through the course of all these conversations, as explained in our May 27, 2022 Cost Sharing Proposal (May 27 Filing) the Company felt that parties had reached general agreement on all but two issues on the Cost Sharing Proposal.

Commenters generally focus on five primary topics in their comments: (1) when and if the Cost Sharing Fee should be reimbursed, (2) seed funding, (3) transparency of interconnection costs, (4) clarification on the specific costs paid from the Cost Sharing Fund, and (5) additional reporting requirements. The remainder of this Reply focuses on these topics and provides further insight into long-term impact of this solution to enable small DER interconnections in constrained areas of our distribution system.

REPLY COMMENTS

I. REIMBURSEMENT OF FUNDS

The Company has proposed that the Cost Sharing Fee be non-refundable, consistent with how MN DIP has described processing applications fees. In addition, our May 27 Filing describes how the Cost Sharing Fee balance cannot go below zero. A negative account would cause the Company to incur undue increased costs and increased administrative expense. Further, in adopting the Cost Sharing Fee concept, the Commission during questioning and deliberations re-iterated that no Company funds were to be at risk under this proposal and consistent with this, rejected a proposal from Xcel Energy to limit the overall size of the Cost Sharing program.⁴ It is for these reasons, we do not support proposals to modify the Cost Sharing proposal to refund this fee.

¹ March 31, 2022 ORDER MODIFYING PRACTICES AND SETTING REPORTING REQUIREMENTS, Docket No. E999/CI-16-521, Pg. 8.

² See Fresh Energy's August 25, 2021 Initial Comments, Attachment 2.

³ The Company had several conversations with this group including stakeholder discussions held on February 16 and May 9, 2022. TruNorth declined to participate in these conversations.

⁴ January 20, 2022 Commission Hearing at 3:38.30.

All Energy Solar has suggested that the Cost Sharing Fee be reimbursed up until the time the project is Deemed Complete, if a project is withdrawn or cancelled.⁵ It argues that this would make the approach here consistent with the Company's policy on how it refunds interconnection application fees. However, the Company's MN DIP tariff sheet 10-213 specifically notes that the \$100 simplified application fee is non-refundable. The Company's Cost Sharing proposal in fact aligns with the non-refundable nature of the interconnection application fee. If applications are fully vetted and submitted with the intent of moving through the interconnection queue, then the Cost Sharing Fee should be treated as being accrued once they are paid to the Company and deposited into the Cost Sharing Fund. Holding these fees in limbo until such time as a project is Deemed Complete creates unnecessary administrative complexity and expense.

The Company understands and acknowledges that this process may become more complex in the event that the Solar*Rewards program is fully allocated, and a project joins a waitlist for Solar*Rewards funding. For context, the Solar*Rewards applications first go through a program process before being officially submitted to the MN DIP process for interconnection. The Cost Sharing Fee would not be due until such time as the project was allocated Solar*Rewards incentive funding and moved into the MN DIP process. Even after this time, it will be up to the interconnection applicant to determine when to submit this fee (as well as other fees) to move the application forward. Once the Cost Sharing fee is submitted, no refund should be expected.

The Company's proposal requires that the Cost Sharing Fee is paid as a requirement for the application to be Deemed Complete. MN DIP at 1.5.2 requires the Interconnection Customer to submit appropriate information to be Deemed Complete 10 business days after receiving notice from the Area EPS Operator a listing of all information that is missing from the application. Even then, several applications receive in serial fashion several 10-day notices as they fail to address all required items from the prior 10-day notice. If an Interconnection Customer wants to proceed with a project, it should pay the Cost Sharing Fee and not expect a refund. If an Interconnection Customer does not want to proceed with a project, then it should not pay the Cost Sharing Fee. Customers should not submit interconnection applications that are uncertain and not thoroughly vetted.

In addition, Solar United Neighbors, Vote Solar, The Institute for Local Self-Reliance and the City of Minneapolis requested to remove income-qualified projects from the

⁵ All Energy Solar Comments, *In the Matter of Northern State Power d/b/a Xcel Energy's Cost Sharing Implementation Plan and Tariff on Interconnection Standards for Distribution Generation*, Docket No. E002/M-18-714, July 20, 2022, pg. 1.

group of customers that pay into the Cost Sharing Fee.⁶ We believe that those benefiting from the Cost Sharing Fee should pay into the fund itself. However, if the Commission determines these customers should be exempt from payment, we believe that over time this will increase the Cost Sharing Fee paid by the remaining pool of small DER customers. Further, before we could implement this new proposal, we would need some additional time to set up a process, align IT resources and separately identify certain eligible customers.

II. WAITLIST

All Energy Solar, MnSEIA and Fresh Energy have requested the Company to create a “waitlist of projects” for interconnection customers to place themselves on hold until funding may become available under the Cost Sharing option. We believe this proposal goes against the Commission’s clear guidance to remove on hold practices and do not support creating a waitlist for these projects within the MN DIP process.

The Commission’s March 31, 2022 Order modified several interconnection practices to move projects more quickly through the interconnection queue and find ways to eliminate barriers for interconnection. The March 31 Order, at page 4, states that “*To address these delays, the Commission will require Xcel Energy to phase out the practice of placing projects on hold and instead adopt practices to expedite the review process.*”

While the Company does have waitlisting option as part of our Solar*Rewards program as discussed above, the process and intent of that waitlist differs from what is being requested by Commenters. The Solar*Rewards waitlist is utilized as part of the process to allocate a set amount of incentive funding available annually for the program. Since projects that have been awarded funding may later drop out of the program, we are then able to reallocate funding to projects on the waitlist. The Solar*Rewards waitlist is only available in the year in which an application is submitted and projects on the waitlist are cancelled every year on December 31, as a new annual funding cycle begins the following year.⁷ Another distinguishing feature is that a project is placed on the Solar*Rewards waitlist prior to the project’s application moving into the MN DIP process and prior to establishing a queue position. However, under the proposed “wait list of projects” for Cost Sharing, the projects to be placed on hold would have advanced well into the MN DIP process. These projects would have an established queue position and likely have projects behind them in queue.

⁶ Solar United Neighbors, Vote Solar, The Institute for Local Self-Reliance and the City of Minneapolis Comments, *In the Matter of Northern State Power d/b/a Xcel Energy’s Cost Sharing Implementation Plan and Tariff on Interconnection Standards for Distribution Generation*, Docket No. E002/M-18-714, June 21, 2022, pg. 6.

⁷ The Solar*Rewards program funding is allocated based on Minn. Statute 116C.7792.

To study an interconnection application, we need to know existing load characteristics, plus the locations and operating characteristics of DER connected to the feeder and substation along with the physical make-up of our network. Additionally, we need to know the locations and operating characteristics of the DER ahead in queue that is not yet in commercial operation along with all changes to our network that we are planning to implement in order to accommodate the DER ahead in queue. Allowing projects to be put on a waitlist within MN DIP would essentially create an on-hold process that could potentially cause prolonged delays for other projects behind in queue and go against the recent direction from the Order to phase out the practice of placing projects on hold.

III. SEED FUNDING

The Company does not support the creation of a seed fund to implement our Cost Sharing Proposal. While we agree with the Department's concern regarding fund availability on a first-come, first-served basis, the proposal originally submitted by Fresh Energy, All Energy Solar and TruNorth Solar (and later approved by the Commission) did not contemplate a seed fund. This was also confirmed during the January 20, 2022 Hearing, where Fresh Energy at about 3:36:45 stated that its cost sharing proposal, "requires no contributions from Xcel or ratepayers." During Commission deliberations on Decision Option 27 which ties to the Fresh Energy Cost Sharing proposal, there was discussion that the Cost Sharing fund would be basically funded by the interconnection customer. The Department was correct that a seed fund would ultimately impact all customers regardless of their participation in solar. By Fresh Energy's own testimony, their proposal did not contemplate a seed fund and therefore such an option was not approved by the Commission.

We note that the Company also made a proposal to cover the cost of interconnection for small DER, up to a certain project-specific dollar cap and a total annual dollar cap.⁸ However, this proposal was ultimately not approved by the Commission, due to concern that all Xcel Energy customers would have been contributing to fund small DER interconnection upgrades.

IV. COVERAGE FOR INSUFFICIENT FUNDS

All Energy Solar suggested that the Cost Sharing Fund itself should cover any potential insufficient funds from the prior year and that Xcel Energy should temporarily cover the costs when there are insufficient dollars in the Cost Sharing Fund. This is another version of the seed fund concept and should be rejected as

⁸ See, September 2, 2021 proposed *Amendment to Solar*Rewards Customer Contract Regarding Distribution Upgrade Costs*, Docket Nos. E002/M-13-1015 & E002/M-16-222.

explained above.

Additionally, All Energy Solar's proposal would only work if the cumulative surplus of funds received versus funds spent in year two at least covers the cumulative deficit from the prior year. Otherwise, the fund would continue to run in the negative.

All Energy Solar also requests that regardless of fund availability, projects paying the Cost Sharing Fee should not be charged the supplemental review fee. However, if the Cost Sharing Fund does not have sufficient funds, there are no additional dollars set aside to pay these review fees. It would be an administrative nightmare to try to track each individual Cost Sharing Fee paid and not accrue that fee to be deposited in the Cost Sharing Fund until we know for each project that there will be no supplemental review fee, as that would be the only way of making sure that there would be sufficient funds available for the supplemental review fee. Further, the suggestion that somehow the review fee can just not be paid conflicts with MN DIP which requires payment of these fees.

We believe these suggested options from All Energy Solar are unacceptable given the administrative burden this would cause, that this is another version of the seed fund concept, and as the Department notes that this would impose DER costs to non-participating customers.

V. ORDER POINT 12

Order Point 12 of the March 31, 2022 Order requires the Company to "provide a detailed report of the costs incurred and technical rationale for each upgrade should Xcel Energy seek cost recovery for Distribution Upgrades." As noted in our May 27 Filing, after discussion with Fresh Energy and other stakeholders there was common understanding that this Ordering Point was in reference to the Company's original proposal to pay upgrade costs for Solar*Rewards projects. This Ordering Point does not apply to the current Cost Sharing Proposal, as it is solely funded by the interconnection customers and therefore the Company will not seek cost recovery for any Distribution Upgrades. However, it was also agreed that there would be benefits to provide ongoing reporting with additional detail. We specified at pages 9-10 of our Cost Sharing Proposal filing the type of reporting that we believed would be appropriate. Additionally, we modify our reporting commitments based on input from the Department.

Fresh Energy suggests in their comments that Order Point 12 is applicable as it was described in their original Interconnection Sharing Proposal, which requested that Xcel Energy develop a Cost Guide document, record distribution upgrades, record initial and final cost estimates, and make it clear if applications that fail screens what

project size (and inverter settings) would allow the project to connect without construction of distribution facilities.⁹ We believe it is important to note that the plain language of Order Point 12 does not require any of the detailed audit-like review listed in the original Interconnection Sharing Proposal. In fact, the Commission declined to accept any of these items proposed by Fresh Energy, as identified in the January 19, 2022 Briefing Papers under Decision Options 29 and 39. These Decision Options that were not adopted by the Commission at the January hearing, state:

- 29. Require Xcel to have the Facilities Study include itemized costs for distribution and network upgrades and interconnection facilities, as well as an indication if a smaller system size would avoid major upgrades. To be implemented within 60 days of the order. (Fresh Energy AES, IREC, Department, NES, Nokomis, MnSEIA, the City, ILSR)
- 39. Require all rate-regulated utilities to develop and publish on their websites a cost guide for typical DER upgrades within 30 days of this Order, update it as needed, and notify the Commission in this docket whenever the guide has been updated. (Fresh Energy, IREC, MnSEIA, the City, Nokomis, NES, AES, ILSR)

Instead, the Commission adopted the Revised Decision Option 37, which forms the basis of Ordering Point 12, which stated:

- 37. (Revised). Require Xcel to provide a detailed report of the costs incurred and technical rationale for each upgrade should the Company seek cost recovery for distribution upgrades from a fee to certain DER customers to cover interconnection upgrades. (Fresh Energy AES, IREC, Department)

We disagree with Fresh Energy's argument that Order Point 12 also includes the requirements from Decision Options 29 and 39. As explained above, Order Point 12 was related to the Company's original proposal to pay upgrade costs for Solar*Rewards projects, which was not adopted. Further, it is clear from being based on Decision Option 37 that Order Point 12 only relates to reporting. The Department was a cosponsor of this reporting request, and our position here aligns with the type and extent of reporting being requested by the Department. Additionally, Fresh Energy's position also differs from our understanding of prior communications with them on this issue, as reflected in our May 27 Filing.

We, however, agree with All Energy that it is important to provide transparency into the costs and payments provided under the Cost Sharing Fund. Accordingly, we have modified our reporting commitment, as described below in Section VIII.

⁹ See, Fresh Energy Comments, *In the Matter of Northern State Power d/b/a Xcel Energy's Cost Sharing Implementation Plan and Tariff on Interconnection Standards for Distribution Generation*, Docket No. E002/M-18-714, July 20, 2022, pg. 3.

A. Challenges with Additional Requests on Itemization

We are not supportive of providing an itemized breakdown of costs, as requested by All Energy Solar and Fresh Energy, outside of what is already provided as part of active compliance filings. Not only do our system and tools not track itemization such as this (many invoices we receive will include various activities lumped together by our vendors), but our contractual obligations and pricing between hired vendors is non-public data that cannot be provided to other developers who also look for cost competitive pricing.¹⁰ Such practices could harm our ability to maintain the prices we have today.

We already provide several details to interconnection customers and identify costs, including:

- Details regarding the technical rationale and costs to be incurred for interconnection applications that require a supplemental review (under MN DIP 3.4) and/or Facilities Study (MN DIP 4.4); and
- Scope of Work provided to small DER interconnections for estimated interconnections.

We also answer questions and explain charges on individual invoices. However, answering questions at a granular level is different than answering questions about why we used a 16-inch bolt instead of a 12-inch bolt, which is the level of detail we sometimes receive questions on. That said, in addition to the contractual considerations, the fact that the Company is acting in the public interest in the way that it designs, constructs, and operates its system, providing unit-level detail would be administratively burdensome and likely lead to disputes – distracting resources whose time is better spent on furthering the public interest by focusing on expedient and safe connection of additional DER to our system. Accordingly, it is not in the public interest for the Commission to adopt the recommendations of All Energy and Fresh Energy on this issue.

B. Cost Guides

Fresh Energy also suggests that the Company should provide interconnection cost

¹⁰ As we have explained previously, the exact costs we pay our suppliers are commercially sensitive and part of confidential contracts Xcel Energy has negotiated with each supplier. These contracts are not specific to materials needed to exclusively support the interconnection of DER projects. Rather, they are our overall supply contracts for all the work we do on Xcel Energy infrastructure enterprise wide. These same suppliers are used by other utilities and, we expect, at least some of the Developers for the work that they do. Revealing our pricing would violate our contractual arrangements – and even under non-disclosure agreements, has the potential to harm our suppliers and any preferential pricing we have secured, potentially resulting in higher costs to not only Developers, but our entire customer base.

guides, such as one that is provided by our operating company affiliate Public Service Company of Colorado (PSCo).¹¹ As we have explained previously in Docket No. E999/CI-16-521, cost guides, by their nature, are generalized to cover a range of costs that might be applicable to many types of projects and are likely to vary from actual estimates prepared as part of specific studies. The PSCo cost guide noted in Fresh Energy's Comments is intended to provide an idea of what costs may be, because cost estimates are not included in Colorado SIS study. Under the Colorado interconnection process, indicative cost estimates are not provided with the SIS results; instead, the SIS results just describe the work that needs to be done to accommodate the project and the developer can then look at the price list to perform their own indicative cost estimate. In Minnesota, we provide much more specific indicative cost details in the SIS, as required in the MN DIP. We believe providing average upgrade costs that are not at all consistent with location is unnecessary and distracting, given our more robust process in Minnesota. We further believe differences between highly generalized costs and actual study indicative cost estimate are inevitable and would be another source of disputes that would require resources from the Company, the Commission, and others to resolve.

VI. REIMBURSED COSTS

MnSEIA has suggested that the Company limit the eligible costs that are paid out from the Cost Sharing Fund, stating that "tree trimming, traffic control, restoration, winter construction, etc." are outside the scope of the intent of these funds and are general costs incurred by the utility. For clarification, all costs associated with the interconnection of DER is assessed to the interconnection applicant as defined in MN DIP. All of these costs to be assessed would be "Interconnection Costs" as defined in Minn. R. 7835.0100, Subp. 12.¹² Tree trimming can be an interconnection cost, for example, if a new line extension is required to allow for the interconnection of the DER and the path of this line extension requires tree trimming. Similarly, if a tree needs to be trimmed to replace or upgrade lines or if winter construction is assessed because of the timing of the work conducted, then these Interconnection Costs are assessed to the interconnection customer as they are a direct result of their project's

¹¹ Public Service Company General Cost Outlines for Typical Distributed Resource System Updates available at: [https://www.xcelenergy.com/staticfiles/xcel-responsive/Working With Us/Renewable Developers/CostOutline-for-DER-Developers.pdf](https://www.xcelenergy.com/staticfiles/xcel-responsive/Working%20With%20Us/Renewable%20Developers/CostOutline-for-DER-Developers.pdf) (January 3, 2020).

¹² "Interconnection costs" means the reasonable costs of connection, switching, metering, transmission, distribution, safety provisions, and administrative costs incurred by the utility that are directly related to installing and maintaining the physical facilities necessary to permit interconnected operations with a qualifying facility. Costs are considered interconnection costs only to the extent that they exceed the corresponding costs which the utility would have incurred if it had not engaged in interconnected operations, but instead generated from its own facilities or purchased from other sources an equivalent amount of electric energy or capacity. Costs are considered interconnection costs only to the extent that they exceed the costs the utility would incur in selling electricity to the qualifying facility as a non-generating customer.

interconnection. These activities are not needed to provide service to our retail customers, and the costs are only incurred to allow the DER to interconnect. MnSEIA's suggestion to remove these types of costs from the Cost Sharing Fund's coverage seems to be contradictory, because if the fund does not cover these costs then the Interconnection Customer would still need to pay these costs. Additionally, we note that this list of costs was vetted by Fresh Energy, All Energy and TruNorth as consistent with their original proposal.

VII. LAUNCH

All Energy Solar, MnSEIA and Fresh Energy suggested starting the Cost Sharing Fee in January of 2023. This would align with the opening of the 2023 program year for the Solar*Rewards program. We agree that our proposed launch date of August 31, 2022, as set forth in our May 27 Filing and proposed tariff sheet, does not align with the need to have a Commission Order to approve our proposed tariff before we launch the Cost Share Fee. While we were attempting to meet the requirements of the Commission's March 31, 2022 Order, the Commission's Notice for Comments issued on June 3, 2022 on our Cost Sharing Proposal indicated to us that we need to await a Commission Order before we can launch our efforts.

We support a January 2, 2023 launch date for this Cost Sharing Proposal if the Commission adopts a Cost Sharing structure that is closely aligned with what we have proposed, and if there is sufficient time (at least 4 months) between the Commission vote and the beginning of the new year. If the Cost Sharing plan, as ordered by the Commission, significantly differs from our proposal then the timeframe for launch will take additional time to adjust our system, tools, and communication efforts to incorporate any significant changes.

VIII. ADDITIONAL REPORTING REQUIREMENTS

The Company agrees to provide additional reporting, as recommended by the Department, as part of our Annual Compliance filing submitted in Docket No. E999/CI-16-521 on March 1 of each year. These include the following:

- The number of interconnection applications 40 kW_{AC} or less 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; and,
- an evaluation of whether an adjustment to the \$200 interconnection fee is warranted.

The Company can also provide additional qualitative details regarding the type of upgrades paid for by the Company as well as additional learnings and challenges presented by the Cost Sharing Fund itself. We believe this responds to the concern to provide additional information on the type of upgrades being paid for and why they were necessary for interconnection.

We further note that any additional reporting on upgrade costs, outside our commitment here, could become an administrative burden. Most of the eligible projects for Cost Sharing will also be receiving Solar*Rewards funding. Administration costs for the Solar*Rewards program are subtracted from the funds available for incentive allocation. Increasing tracking of upgrade costs could require additional administration cost and reduce the funds available for the Solar*Rewards program.

IX. LONG TERM SOLUTIONS

Additionally, we realize that the Cost Sharing Fee is not without challenges and may not provide a long-term solution for interconnecting small DER in capacity constrained areas. In his Comments, Rick Grauger explains a real situation within the interconnection queue. His 7.8 kW rooftop project has recently benefited from our implementation of a “parallel review” process, moving his project forward out of the on-hold status. However, removing this project from the “on-hold” status will not resolve the cost of interconnecting to the PAT313 feeder. According to Xcel Energy’s July 1, 2022 Public DER Queue Report¹³, the PAT313 feeder is on the capacity constrained list, meaning that the feeder has aggregate DER (in this case 18 MW of solar) that is greater or equal to the Daytime Minimum Load (DML) and will likely fail the initial review screens laid out as part of MN DIP and require supplemental reviews resulting in substantial upgrades. If the Cost Sharing Proposal is approved, this project likely would not be able to have its costs fully covered by the Cost Sharing Fund. It has yet to be determined as to whether capacity would even be available for the project under \$15,000. For any sized project in a capacity constrained area, upgrading a substation or feeder to provide even a little incremental DER capacity could cost millions of dollars.

As addressed in our August 25, 2021 Comments and October 1, 2021 Reply in

¹³ <https://mn.my.xcelenergy.com/s/renewable/developers/interconnection>

Docket No. E999/CI-16-521, we have observed continued frustration by customers installing roof top solar: specifically, as a result of capacity constraints and larger upgrade costs driven by community solar on any number of given feeders. To-date, we have issued over 20 Phase II System Impact Study notices to small DER interconnections with anticipated upgrade costs that often exceed the \$15,000 cap included in the Cost Sharing Proposal. We continue to believe that Cost Sharing can be one of the solutions to continuing the growth of small solar, but until there are rules established by the Commission to reserve capacity for these retail rooftop customers, they will continue to compete for capacity space with other interconnections on a first-come, first-serve basis.

X. OTHER ISSUES

Commenters raised various other issues that have no merit. For example, All Energy Solar does not want the Cost Sharing Fee to be a tariffed rate. We believe that it is best practice to include this rate in our tariff. This aligns with several statutes, including Minn. Stat. 216B.05 (“*Every public utility shall file with the commission schedules showing all rates, tolls, tariffs, and charges which it has established and which are in force at the time for any service performed by it within the stated, or for any service in connection therewith or performed by any public utility controlled or operated by it.*”) If there is a need to change this tariffed Cost Sharing Fee, our proposal here is to use the 30-day negative check-off procedure. If there is any timely objection, then the Commission would need to issue a written order before the proposed change to the tariffed fee could be implemented.

All Energy Solar requests guidance as to under what circumstances we would ever charge a Facilities Study fee for any project 40 kW_{AC} or less. One potential example is if a Phase II study is performed to replace a substation transformer or to put in a new feeder to allow the interconnection of a specific project; the Facilities Study associated with this project would be charged a Facilities Study fee. While we expect that this would rarely happen, it is a possible scenario. However, we cannot provide a listing of all possible but unlikely scenarios where we would charge a Facilities Study fee for projects under 40 kW_{AC}.

All Energy Solar also requests that the interconnection customer has a right, within reason, to request when the construction of facilities takes place, for example, to avoid more expensive winter construction. We note that the Company already offers this type of flexibility to customers who have executed and funded interconnection agreements and accommodates requests to delay construction so that winter conditions are avoided.

Solar United Neighbors, Vote Solar, the Institute for Local Self-Reliance and the City of Minneapolis also argue that DER customers should not be solely responsible for

interconnection costs. However, this topic is out of scope for the current round of comments and also violates the cost causer rules that are core to how DER projects are interconnected. The Commission Notice limited the comment period to the Cost Sharing Proposal and comments should not be used to propose a fundamental change to the core regulatory principle of cost causation. This group also wants to make sure that Xcel Energy does not earn a profit on the DER interconnection costs it assesses to DER projects. This same issue has already been addressed at length in prior filings – Xcel Energy does not earn on the amount spent to interconnect DER where a third party pays for these interconnection costs. The net book value to us is zero in this situation. See, for example, our document “*Accounting Treatment for Costs of Distribution Upgrades*,” submitted as part of Attachment D to our October 1, 2021 Reply Comments in Docket No. 16-521 (which in turn is a copy of that same document filed on February 22, 2019 in Reply Comments in Docket No. 18-714).

CONCLUSION

The Company appreciates the parties’ Comments on our Cost Sharing Proposal and the opportunity to respond. We believe we have proposed an option that meets the fundamental criteria of the original proposal developed by Fresh Energy, All Energy Solar and TruNorth. While we are not supportive of creating a seed fund, we can agree to adjusted timing of the launch depending on the structure of the final Cost Sharing plan adopted by the Commission. We can also add additional reporting requirements as requested by the Department. We look forward to further discussion regarding the Cost Sharing Proposal and the future ability to utilize this option as one way to continue the growth of small DER interconnection but caution that Cost Sharing may not provide a solution for all small DER interconnections, especially in capacity constrained areas.

Dated: August 1, 2022

Northern States Power Company

CERTIFICATE OF SERVICE

I, Christine Schwartz, 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; or

xx by electronic filing.

Docket No.: E002/M-18-714

Dated this 1st day of August 2022.

/s/

Christine Schwartz
Regulatory Administrator

[illegible]

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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	Groebner	sgroebner@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
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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
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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
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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	annielf@cubminnesota.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	CMMPA	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

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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
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
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
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

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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
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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
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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
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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
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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
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