



December 21, 2022

**VIA ELECTRONIC FILING**

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

Re: In the Matter of Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff  
Providing Additional Customer Protections in Subscription Eligibility

**PUC Docket No. E002/M-21-695**

Dear Mr. Seuffert:

Please find the attached Reply Comments of the Energy CENTS Coalition in the above-referenced matters. If you have questions about these comments, please call me at 651-280-7427.

Sincerely,

Executive Director  
Energy CENTS Coalition

**State of Minnesota  
Before the Public Utilities  
Commission**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of Xcel Energy’s Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility     **Docket No. E002/M-21-695**

**Comments of the Energy CENTS  
Coalition**

The Energy CENTS Coalition (“ECC”) appreciates the opportunity provide comments the regarding the Xcel Energy’s (“Xcel” or “the Company”) compliance filing in the above referenced matter.

On September 23, 2021, ECC joined the Company, Mid-Minnesota Legal Aid, and the Citizens Utility Board of Minnesota, (Joint Petitioners) in filing a petition and tariff with the Commission proposing modifications to the existing tariff under the Standard Contract for Solar\*Rewards Community, adding protections for tenants in premises subject to a “Building Subscription” CSG model.

- **Should the Commission approve the proposed modifications to the Community Solar Garden Program (Solar\*Rewards Community) on tariff sheets 9-74, 9-76, and 9-99.1 through 99.3 as outlined in Attachment F of the Compliance Filing?**
- **Should the Commission approve the proposed modifications to the Solar\*Rewards Community tariff sheet 9-66.1 as outlined in Attachment F of the Compliance Filing?**

ECC recommends the Commission approve the proposed modifications. Compulsory enrollment in a CSG is not what comes to mind initially to most people with the goal of providing “access to renewable energy”.<sup>1</sup> This may offer at least a partial explanation of

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<sup>1</sup> COMPLIANCE FILING-PROPOSED COMMUNITY SOLAR GARDEN PROGRAM AND TARIFF REVISIONS UPDATING COMMUNITY SOLAR GARDEN TARIFF PROVIDING ADDITIONAL CUSTOMER PROTECTIONS IN SUBSCRIPTION ELIGIBILITY, DOCKET NOS. E002/M-13-867 & E002/M-21-695, November 11, 2022, Attachment A, p.10

why consumer protections and the value of individual agency in personal financial decisions were not embedded in these tariff sheets from inception. The modifications proposed in the Company's Standard Contract for Solar\*Rewards Community tariff sheets are the result of a stakeholder process described in the compliance filing that included individuals from varied legal, advocacy and programmatic background with decades of experience working to promote policies and statutes to protect the rights of utility consumers.

However, the most compelling reason to approve the proposed Opt-In/Opt-Out language and "Landlord as Subscriber" Addendum is from the consumers themselves. I am including the testimony below from the witnesses for the Joint Petitioners presented during oral arguments at the May 5, 2022, hearing at the Commission on this matter. The first witness statement is from a tenant who would have been protected from financial harm with Opt-in/Opt-out and the "Landlord as Subscriber" Addendum.

*In January of last year, my landlord required all tenants to enroll in the building's Solar Garden. The landlord did this by taking over my Xcel Energy account without my knowledge or my consent. The landlord made this change so that all tenants got included in the building's Solar Garden whether or not they wanted to enroll. This change has been a disaster. My landlord created a billing mess that put me seriously behind on rent and now I'm facing the threat of eviction.*

*I am on a fixed income through SSI. I told my landlord that I did not want to be part of the Solar Garden. The landlord told me that if I provided proof of energy assistance from any program, I would be exempt from the building CSG.*

*Even though I showed them proof that I received energy assistance, my landlord took over my Xcel account anyway...Due to the landlord's forced Solar Garden enrollment, I had lost this Medical Assistance credit and was instead receiving a solar credit of only \$3.70 a month...When my account was taken over by my landlord, the electric charges were included as rent. When I paid rent each month, the payment was first applied to the past due electric balance. That made it even more difficult for me to pay my rent, especially because late charges were added to these bills.*

*Before I knew it, I owed over \$400 in past due bills and late fees. It was completely unmanageable and stressful. Ultimately, I received three separate threats of eviction.*

*By enrolling me in the Solar Garden against my wishes, my landlord deprived me of control over my own accounts, financial independence, and my ability to keep up on my bills. I've been current on my bills my entire life, but because my landlord took over my Xcel Energy account to force me into the Solar Garden program, I lost my financial stability.*

*Please approve the Petition so this doesn't happen to other low-income tenants. (Emphasis added).*

This second witness statement, below, is the daughter speaking on behalf of her elderly mother that does not speak English.

Both my mother and I have been negatively impacted by the baffling Solar Garden subscription practices of the landlords at the Midtown Exchange Building in Minneapolis, a building where we have been tenants in good standing for 15 years.

*My mother and I have always kept up with our bills and have maintained our Xcel electric accounts with automatic payments. That suddenly changed in February 2021. Our landlord took over our Xcel Energy accounts to enroll us in the building's Solar Garden program. Our landlord transferred our Xcel accounts out of our names and into theirs, and they did this without our knowledge or consent. The impacts of these actions by our landlord were devastating.*

*Though we didn't notice this flip right away because our Xcel accounts were set up with automatic payments, we soon saw that we were being charged for electricity through our monthly rent bill. Because those billing cycles are so delayed, we were charged for more than two months' electric bills at one time. At first, we didn't understand what these charges were for. We found out that those amounts included extra charges for transferring our Xcel electric account multiple times between our name and the landlord's.*

*This created a serious hardship for my mother. She is elderly and lives on a fixed income. Before the account flip, my mother received Energy Assistance and was enrolled in the Xcel's POWER On program. This assistance provided my mother an extra \$15 a month towards her electric bill. However, when our landlord flipped our accounts, we were no longer Xcel customers, and my mother could no longer receive assistance in paying for her electric bill. Instead, she received a solar energy credit from the landlord of \$2.70 per month...This is when my mother got behind in paying her bills. She couldn't just suddenly start paying out of her fixed income the extra money that her previous assistance had covered. Also, because our rent and energy were now combined onto one bill from the landlord, those bills showed she was behind on her rent payments. As a result, in March 2021, my mother and I began to receive past due bills that threatened eviction.*

*It's outrageous to think that we are faced with losing our home of 15 years because our landlord gets the financial benefits of the Solar Garden program by forcing its tenants to enroll. Even more outrageous is that our story is one of many from the tenants at the Midtown Exchange Building. Many of the building's residents are like my mother, elderly and on fixed incomes. We should not be removed from our Xcel Energy accounts and forced into a Solar Garden subscription. We were forced into a Solar Garden subscription that may very well put many of us out of our homes if the Commission does not affirm that Solar Garden subscriptions should be voluntary. (Emphasis added).*

The Company's proposed modifications would eliminate the financial harm exemplified by the witness' experiences as well as protect the approximately 121 low-income consumers that both received LIHEAP and were compulsorily subscribed to a CSG by their landlord that no doubt faced similar housing stability and economic hardships.

Considerable time has been spent on trying to find a solution to extend the Company's low-income programs to tenants who are no longer account holders. Often the most simple solution is also the best solution. Consumers can choose to Opt-in and it is very likely that the majority of the 4000 individually metered accounts subject to re-billing and not utilizing utility assistance programs, would choose to participate. A building subscription or landlord as subscriber CSG model would likely still operate as a successful business model if 121 low-income consumers chose not to subscribe or continue a subscription in favor of maintaining their own Xcel Energy accounts.

Furthermore, these Xcel Energy account holders, would still be able to access LIHEAP assistance, Power On Program credits, and would also be able to access renewable energy by becoming an individual subscriber to a CSG of their choice. Additionally, these customers would be eligible receive a LIHEAP benefit based on the cost associated with that subscription paid directly to the CSG operator. See the excerpt below from the Federal Fiscal Year 2023 Energy Assistance Policy Manual, Chapter 4, page 6.

### **Does the household subscribe to a solar garden?**

For households with a solar garden subscription:

- In eHEAT, add the solar garden in the **Energy Providers** section with the fuel type "Solar Electricity."
- If the solar garden is not already in eHEAT, they will have to complete vendor registration.
- For consumption, enter the total annual solar garden subscription cost.
- If unable to get the solar garden subscription cost, invalidate the electricity provider's consumption. This provides the most complete picture of the household's energy costs and results in eHEAT using the electricity back-up matrix to determine the household's benefit amount.
- Solar electricity cannot have a Crisis event because there is no risk of shut-off.

The coordination of energy assistance benefits already exists for low-income renters that receive LIHEAP benefits, who are customers of regulated utilities with affordability programs and subscribers of a community solar garden. Apparently, what we have in this case, is the owner(s) of a multifamily property (s) that removes individually metered utility accounts to a master bill for the property in the landlord's or agent of the owner's name and re-bill tenants in those individually metered premises in order to provide "access to renewable energy" in a community solar garden which is owned and operated by the owner of the multifamily property. The re-billing agent has registered as a vendor for several community service providers contracted to administer LIHEAP, a process that any landlord that re-bills their tenants is allowed to do in order to receive direct payments of LIHEAP benefits on behalf of

their tenants. See excerpt below from the Federal Fiscal Year Energy Assistance Policy Manual, Chapter 8, page 5.

### **Payments to Households with Account in Landlord's Name**

If the household's energy account is in the landlord's name, it can be addressed as follows:

- Payments are made to the account on behalf of the household to the energy vendor.
- The landlord can become an EAP energy vendor. All agreement, registration and participation requirements are the same for landlords as energy vendors (see [Chapter 16 - Energy Vendors](#)).

The Minnesota Department of Commerce's Energy Assistance Program, for the purposes of providing federal LIHEAP grant funds to the party charging a low-income household for energy has created a "vendor" determination in their client database, eHEAT. Service providers of the local LIHEAP program enter into a vendor agreement with co-op and municipal utilities delivered fuel providers, community solar gardens, landlords (or re-billing services) and regulated utilities (many of which offer affordability programs to customers).

### **• Should the Commission amend and reopen Order Point 2b from the June 24, 2022 Commission Order?**

ECC recommends that the commission amend and reopen Order Point 2b from the June 24, 2022 Commission Order. Xcel Energy is a vendor within the LIHEAP program, as well as a regulated utility with affordability programs authorized in MN Statute 216B.16 (14) with applicable statutory reporting requirements based on customer data, including income and bill payment history.

Receipt of LIHEAP is a requirement for a customer of a regulated utility providing an affordability program. LIHEAP customer data is provided to utility companies, with individual customer accounts, which administer affordability or other energy programs to facilitate the receipt of those benefits. The MN Energy Assistance Application Rights and Responsibilities list this use specifically. (See Attachment A). Landlords or re-billing services are not "energy companies" with "affordability and Energy Programs." A premise number within a master building account is not included as an identified customer account of a utility with a signed LIHEAP application on file. Landlords or re-billing services receive eligibility status and payment information as vendors and not customer income and demographic data.

LIHEAP and utility affordability programs should not be conflated and treated as "energy assistance". The administrative, operational and reporting processes and have been developed and coordinated to ensure customer data privacy, federal and state statutory compliance and regulatory policy compliance. The inclusion of a landlord or re-billing service in these program delivery processes in order to ensure 121 tenants in a multifamily

property with a building subscription model for their community solar garden is not reasonable or prudent. My concern expressed at the stakeholder meetings regarding the lack of understanding of the LIHEAP program data by Mike Mengel, Sagliti President, regarding their rebilling service, JIT, is indicative of the concern shared by Xcel Energy. In an email response to stakeholder questions regarding the LIHEAP participation of JIT customers, Sagliti could not correctly identify how many LIHEAP households they currently served or how many were also subscribed to their CSG.

Xcel Energy's low-income programs have reached over 30,000 customers annually to assist them to afford their energy bills and retain their consumer protections. As stated earlier, the coordination of assistance programs exists for low-income renters to subscribe to a CSG, receive LIHEAP and participate in Xcel Energy's low-income programs.

**• Should the Commission approve the proposed modifications to the Low-Income Discount Rider on tariff sheet 5-95 as outlined in Attachment F of the Compliance Filing?**

ECC recommends the Commission eliminate the electric consumption requirement for the POWER On Program. Customers would be eligible for POWER On if their bill, at even the lowest usage levels, exceeded 3% of their annual household income. Customers in a household of any size that are paying over 3% of their household annual income with electric consumption average usage of 300 kWh per month and below are all living on incomes below the federal poverty line. Therefore, the POWER On Program would continue to target the lowest income customers without having a usage qualifier.

**CONCLUSION**

ECC believes that Xcel's proposed modifications to the Standard Contract for Solar\*Rewards Community tariff sheets 9-66.1, 9-74, 9-76, and 9-99.1 through 99.3, offer critical consumer protections, and are in the public interest.

ECC also respectfully recommends the Commission to amend and reopen its original Order point 2b that states "Xcel shall propose a modification to its tariffs for these programs to allow low-income renters who are subject to third-party billing to access these programs" and remove this requirement as the parties are not able to implement this.

Respectfully submitted

December 21, 2022



## Privacy Notice

**Privacy Act Provisions:** Federal and state laws require us to tell you about your rights and responsibilities before we collect and use information about you that is classified as private or confidential. This form provides you with important information that complies with the federal Privacy Act of 1974, 5 U.S.C. § 552a(e)(3) and the Minnesota Government Data Practices Act, Minn. Stat. § 13.04, subd. 2 (also referred to as a Tennesen Warning).

Please read this *Privacy Notice* carefully before completing and signing the *Minnesota Energy Programs Application*, and keep this *Privacy Notice* in your records for future use. This *Privacy Notice* applies to the Energy Assistance Program (EAP), Weatherization Assistance Program (WAP) and Conservation Improvement Program (CIP), also known as Energy Programs.

### Why do we collect the information on the application?

We will use your information to research, evaluate and administer the Energy Programs. We need the information:

- To know you from other individuals.
- To see if you qualify for assistance.
- To allow us to get federal or state funds for the assistance you receive.
- To meet federal or state reporting requirements.

### Do you have to give us the information?

You have the right to not give us the information we ask for.

### What happens if you give or do not give us information?

If you give us the information requested on the application, your application will be processed. If you do not give us that information:

- Your application will not be processed.
- You might not receive services.
- You might not receive help with energy bills.
- Your services might be delayed.

We will keep whatever information you give us, whether or not your application is approved.

### Who may see this information?

The following persons may receive information contained in your Energy Programs application if: (i) they need access to the application information to do their jobs in connection with the Energy Programs (EAP, WAP, and CIP), or (ii) they are otherwise authorized by federal or state law to receive it, or (iii) they use the information for reports, to measure outcomes, and for referrals and eligibility purposes:

- Local Energy Programs Service Providers under contract with the Minnesota Department of Commerce (Commerce).
- Community Services Block Grant and Minnesota Community Action Grant Service Providers under contract with Commerce.
- Program auditors as required or permitted by Office of Management and Budget (OMB) guidance.
- Minnesota Departments of Administration, Commerce, Employment and Economic Development, Health, Housing Finance Agency, Human Services, Revenue and MN.IT Services.
- United States Departments of Health and Human Services and Energy.
- Minnesota Public Utilities Commission.
- Minnesota Legislative Auditor.
- Persons so authorized pursuant to court order.
- Your energy companies for affordability and Energy Programs.
- Minnesota Community Action Partnership.
- United States Social Security Administration.
- Other agencies or entities as allowed by federal or state law.

### Why do we collect Social Security Numbers?

We use Social Security Numbers in the administration of the Energy Programs (EAP, WAP, and CIP) to assure eligible applicants and their household members receive only allowable benefits. Federal law allows us to require you to disclose your Social Security Number in order to process your application and to prevent, detect and correct fraud and abuse. AUTHORITY: Section 205(c)(2)(C)(i) of the Social Security Act, 42 U.S.C. § 405(c)(2)(C)(i). All applicants (except eligible non-citizens) are required to provide a verifiable Social Security Number in order to process your application.

### Why do we ask for information about your race?

This is voluntary information. It is compiled and recorded for statistical purposes only. The program cannot discriminate for reason of race or ethnic background, religion, gender, sexual orientation, or political affiliation.



## Your Rights and Responsibilities

### You have certain rights to get help:

You have the right:

- To apply again if you get denied.
- To apply for more help if you need it.
- To know what the rules are and how we decide what help you get.
- To receive a response within a reasonable time of submitting all information.
- To appeal within 30 days after you are sent the results of your application if:
  - You receive a denial letter and think we used the wrong information to make the decision.
  - You do not receive the help you were promised.

### You have these responsibilities:

You must tell us if you or any member of your household:

- Received help with your energy bills earlier this winter.
- Move to a new address (tell us within 30 days of the move).
- Change your fuel dealer or gas or electric companies.

**This program may pay only part of your heating and electric bills. You are responsible to pay the rest.**

### What if you think the information in your file is wrong?

Talk to your local EAP Service Provider about what you think is wrong in your file.

### What happens if you give false information?

The local EAP Service Providers or the Minnesota Department of Commerce may check and verify any of the information contained on your application or otherwise provided. You may be denied Energy Program benefits if you provide incomplete or false information. You may be held civilly or criminally liable under federal or state law for knowingly making false or fraudulent statements on your application.

### How to submit a complaint:

If you think your energy payment was not what it should be or you did not get the services you thought you would, you may contact the local EAP Service Provider listed on the application. If you are not satisfied with their answer, you may write an appeal letter to the local EAP Service Provider. Keep a record of their address and telephone number.

If you are not satisfied with their response to your appeal, write to:

Appeals Officer  
Energy Assistance Program  
Minnesota Department of Commerce  
85 East 7th Place, Suite 280  
St. Paul, MN 55101-2198

If you feel you have been treated differently because of your color, race, national origin, religion, sex, gender, age, marital status, political beliefs, or physical, mental or emotional disability, write to one of the following:

Minnesota Department of Human Rights  
Grigg's Midway Building  
540 Fairview Ave. N, Suite 201  
St. Paul, MN 55104  
<https://mn.gov/mdhr/>

-OR-

U.S. Department of Health and Human Services  
Office for Civil Rights, Region V  
233 North Michigan Avenue, Suite 1300  
Chicago, IL 60601  
[www.hhs.gov/ocr/civilrights/complaints](http://www.hhs.gov/ocr/civilrights/complaints)

# **AFFIDAVIT OF SERVICE**

Catherine Fair certifies that on the 21<sup>st</sup> day of December 2022, she served, by electronic filing, the Energy CENTS Coalition's Comments on the Compliance Filing, In the matter of Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility, PUC Docket Nos. E002/M-21-695, to the individuals on the attached service list.



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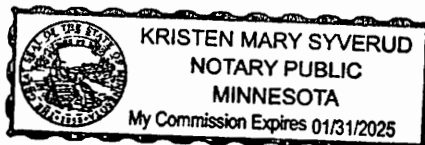
Catherine Fair



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Kristen Syverud

Subscribed and sworn to before  
me this 21<sup>st</sup> day of December, 2022.



Notary Public

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_21-695_21-695
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211  Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_21-695_21-695
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St  Denver, CO 80204-8020	Electronic Service	No	OFF_SL_21-695_21-695
Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP	396 Hayes Street  San Francisco, CA 94102	Electronic Service	No	OFF_SL_21-695_21-695
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-695_21-695
Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC	855 Village Center Drive #256  North Oaks, MN 55127	Electronic Service	No	OFF_SL_21-695_21-695
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_21-695_21-695
Elizabeth	Bremer	Elizabeth.B@Sagiliti.com	JIT Services Inc	23505 Smithtown Rd Ste 280  Excelsior, MN Excelsior	Electronic Service	No	OFF_SL_21-695_21-695
Gabriel	Chan	gabechan@umn.edu	University of Minnesota	130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, Minnesota 55455	Electronic Service	No	OFF_SL_21-695_21-695
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_21-695_21-695

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Cray	kevin@communitysolaraccess.org	CCSA	1644 Platte St Denver, CO 80202	Electronic Service	No	OFF_SL_21-695_21-695
Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures	3500 Bloomington Ave. S Minneapolis, MN 55407	Electronic Service	No	OFF_SL_21-695_21-695
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-695_21-695
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-695_21-695
Betsy	Engelking	betsy@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-695_21-695
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_21-695_21-695
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_21-695_21-695
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_21-695_21-695
Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-695_21-695

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_21-695_21-695
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_21-695_21-695
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_21-695_21-695
Sean	Gosiewski	sean@afors.org	Alliance for Sustainability	2801 21st Ave S Ste 100 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_21-695_21-695
Scott	Greenbert	scott@nautilussolar.com	Nautilus Solar Energy, LLC	396 Springfield Aver, Ste 2 Summit, NJ 07901	Electronic Service	No	OFF_SL_21-695_21-695
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-695_21-695
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_21-695_21-695
Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments	8100 Boone Blvd Suite 430 Vienna, VA 22182	Electronic Service	No	OFF_SL_21-695_21-695
John S.	Jaffray	jjaffray@jjrpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_21-695_21-695
Julie	Jorgensen	juliejorgensen@greenmark solar.com	Greenmark Solar	4630 Quebec Ave N New Hope, MN 55428-4973	Electronic Service	No	OFF_SL_21-695_21-695

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC	4710 Blaylock Way  Inver Grove Heights, MN 55076	Electronic Service	No	OFF_SL_21-695_21-695
Ralph	Kaehler	Ralph.Kaehler@gmail.com		13700 Co. Rd. 9  Eyota, MN 55934	Electronic Service	No	OFF_SL_21-695_21-695
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road  Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_21-695_21-695
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9  Chicago, IL 60604	Electronic Service	No	OFF_SL_21-695_21-695
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_21-695_21-695
Aaron	Knoll	aknoll@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-695_21-695
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_21-695_21-695
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200  Wayzata, MN 55391	Electronic Service	No	OFF_SL_21-695_21-695
Alice	Madden	alice@communitypowermn.org	Community Power	2720 E 22nd St  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-695_21-695
Jason	Maur	jason.maur@renesolapower.com	Renesola Power Holdings, LLC	850 Canal Street 3rd Floor Stamford, CT 06902	Electronic Service	No	OFF_SL_21-695_21-695

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Matthew	Melewski	matthew@nokomisenergy.com	Nokomis Energy LLC & Ole Solar LLC	2639 Nicollet Ave Ste 200  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_21-695_21-695
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_21-695_21-695
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-695_21-695
Mike	Menzel	Mike.M@Sagility.com	J-I-T Services, Inc.	N/A	Electronic Service	No	OFF_SL_21-695_21-695
Marc	Miller	mmiller@soltage.com	Soltage, LLC	66 York Street, 5th Floor  Jersey City, NJ 07302	Electronic Service	No	OFF_SL_21-695_21-695
Marcus	Mills	Marcus@communitypowermn.org	Community Power	2720 E 22nd St  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-695_21-695
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-695_21-695
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220  Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_21-695_21-695
Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association	2288 University Ave W  St. Paul, MN 55114	Electronic Service	No	OFF_SL_21-695_21-695
Patty	O'Keefe	patty.okeefe@sierraclub.org		2525 Emerson Ave S Apt 2  Minneapolis, MN 55405	Electronic Service	No	OFF_SL_21-695_21-695

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_21-695_21-695
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-695_21-695
Eric	Pasi	ericp@ips-solar.com	IPS Solar	2670 Patton Rd  Roseville, MN 55113	Electronic Service	No	OFF_SL_21-695_21-695
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive  Belmont, CA 94002	Electronic Service	No	OFF_SL_21-695_21-695
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_21-695_21-695
Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now	N/A	Electronic Service	No	OFF_SL_21-695_21-695
Paula	Prahl	paula.prahl@dominiuminc.com	Dominium	2905 Northwest Blvd Ste 150 Plymouth, MN 55441	Electronic Service	No	OFF_SL_21-695_21-695
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_21-695_21-695
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-695_21-695
Jonathan	Roberts	jroberts@soltage.com	Soltage	66 York St 5th Floor Jersey City, NJ 07302	Electronic Service	No	OFF_SL_21-695_21-695



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Delaney	Russell	delaney@mnipl.org	Just Solar Coalition	4407 E Lake Street Minneapolis, MN 55407	Electronic Service	No	OFF_SL_21-695_21-695
Kyle	Samejima	kyle@mplsclimate.org	Minneapolis Climate Action	N/A	Electronic Service	No	OFF_SL_21-695_21-695
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-695_21-695
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_21-695_21-695
Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC	233 Park Ave S Ste 201 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-695_21-695
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_21-695_21-695
Ralph J	Solar Consulting	N/A	IPS Solar	821 Raymond Ave Ste. 400 St. Paul, MN 55114	Paper Service	No	OFF_SL_21-695_21-695
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-695_21-695
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-695_21-695
Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light	N/A	Electronic Service	No	OFF_SL_21-695_21-695
Anna	Tobin	atobin@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-695_21-695

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Zack	Townsend	zachary.townsend@brookfi eldrenewable.com	Brookfield Renewable	200 Liberty St FL 14  New York, NY 10281	Electronic Service	No	OFF_SL_21-695_21-695
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_21-695_21-695
Gary	Van Winkle	gvanwinkle@mylegalaid.or g	Mid-Minnesota Legal Aid	111 N Fifth St Ste 100  Minneapolis, MN 55403	Electronic Service	No	OFF_SL_21-695_21-695
John	Vaughn	jvaughn@rreal.org	Rural Renewable Energy Alliance	3963 8th Street SW  Backus, MN 55435	Electronic Service	No	OFF_SL_21-695_21-695
Kevin	Walker	KWalker@beaconinterfaith. org	Beacon Interfaith Housing Collaborative	N/A	Electronic Service	No	OFF_SL_21-695_21-695