

**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

Katie Sieben
Joseph Sullivan
Valerie Means
Matt Schuerger
John Tuma

Chair
Vice-Chair
Commissioner
Commissioner
Commissioner

In the Matter of the Petition of Northern States
Power Company for Approval of its Proposed
Community Solar Gardens Program

DOCKET NO. E-002/M-13-867

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

DOCKET NO. E-002/M-21-695

**COMMENTS OF THE OFFICE OF
THE ATTORNEY GENERAL**

INTRODUCTION

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits the following Comments in response to the Commission’s November 22, 2022 Notice of Comment Period on Xcel Energy’s (“Xcel” or “the Company”) November 11, 2022 compliance filing proposing revisions to its community solar garden (“CSG” or “solar garden”) program tariff. The tariff revisions create requirements for CSGs that are affiliated with apartment buildings. Specifically, landlords would be required to obtain a tenant’s informed consent before enrolling the tenant’s unit in a solar garden, allow tenants to opt out at any time, and provide enrolled tenants with protections from disconnection and eviction for failure to pay their electric bill. Because the proposed revisions appropriately balance the need to make solar gardens reasonably accessible and the need to protect low-income tenants from financial arrangements that may not benefit them, the Commission should approve Xcel’s proposal.

BACKGROUND

I. PRIOR PROCEEDINGS

On October 23, 2021, Xcel, Mid-Minnesota Legal Aid, Energy Cents Coalition, and the Citizens Utility Board of Minnesota (collectively, “the Joint Petitioners”) filed a petition proposing modifications to Xcel’s CSG tariff. The proposed modifications would have required that any CSG subscription associated with a rental property be in the name of the tenant rather than the landlord and that the tenant be an Xcel account holder.¹ The purpose of this change was to prevent a landlord from taking control of its tenants’ electric accounts to subscribe them to a community solar garden (an arrangement that has been referred to as a “building subscription”²). The Joint Petitioners reported that some low-income tenants had been involuntarily enrolled in building subscriptions and had lost their energy assistance benefits because they were no longer the Xcel account holder for their unit.

Several parties suggested that, rather than disqualifying CSG subscriptions held by landlords on behalf of their tenants, Xcel could modify its energy assistance programs to allow tenants to receive the benefits they would qualify for if they remained Xcel account holders.³

On June 24, 2022, the Commission issued an Order Denying Petition, Addressing Low-Income Energy Assistance Programs, and Requiring Further Proceedings. The Commission declined to adopt the Joint Petitioners’ proposal, finding that it was not clear that the proposal would provide the most appropriate remedy. The Commission instead directed Xcel to, among other things, convene a stakeholder group to further discuss the issues and to propose a tariff

¹ The modification would, however, have exempted single-meter apartment buildings from this requirement.

² For a description of the “building subscription model” see the Initial Comments of TBR, LLC at 4–5 (Nov. 15, 2022).

³ See, e.g., OAG Letter at 3 (Dec. 6, 2021); Department Reply Comments at 6 (Dec. 6, 2021); City of Minneapolis Comments at 1–2 (Nov. 15, 2021).

modification to PowerOn and other Xcel-administered low-income assistance programs to ensure that tenants can qualify for these programs even if they are not billed directly by Xcel.

II. XCEL’S TARIFF FILING

On November 11, 2022, Xcel made a compliance filing that included a new set of proposed revisions to its CSG tariff. At a high level, the proposed revisions provide that, with certain exceptions, if a premise associated with a CSG subscription is occupied by residential tenant, and the landlord is the named customer on the Xcel account, then the landlord must obtain the tenant’s written consent before transferring the account and enrolling the unit (“opt in”) and must also allow a tenant to “opt out” at any time and regain control of their account.⁴ Xcel’s tariff revisions also include a tenant opt-in form that informs tenants that by “closing my Xcel Energy account and agreeing to be rebilled for electric usage by the Landlord . . . I will no longer be eligible for any Xcel Energy Affordability Programs (PowerOn, Medical Assistance Program, Senior Low Income Discount).”

Xcel does not propose revisions to its affordability programs that would allow tenants who are not account holders to receive energy assistance. The Company contends that extending affordability benefits to tenants who no longer retain an Xcel account is inconsistent with Minnesota Statutes and is unworkable as a practical matter.

Finally, Xcel proposes additional tariff modifications that would (1) lower the usage threshold to qualify for PowerOn and (2) add several protections for tenants who opt into a whole-building CSGs. The latter protections include, among other things:

- A landlord must not disconnect a tenant’s unit from electric service for nonpayment of electric service charges;

⁴ See Xcel Compliance Filing, attach. F (tariff redlines) at sheets 66.1, 99.1 (Nov. 11, 2022).

- A landlord must not charge fees for utility bill processing, or for account transfer, unless explicitly permitted by law;
- For unpaid electric balances over \$10, a landlord may not charge late fees greater than the larger of \$1 or 1.5 percent;
- A landlord must not bring a nonpayment eviction action solely because of unpaid electric service charges;
- A landlord must apply partial payments toward rent before utility charges;
- A landlord must offer a dispute-resolution process; and
- A landlord must offer payment agreements during the Cold Weather Rule period and provide other Cold Weather Rule protections.⁵

ANALYSIS

I. XCEL’S PROPOSED TARIFF REVISIONS WOULD PROTECT LOW-INCOME RENTERS AND SHOULD BE APPROVED.

Xcel’s new CSG tariff-modification proposal is a substantial improvement over the original proposal. Unlike the original proposal, which would have invalidated nearly all CSG subscriptions associated with individually metered rental units for which the landlord pays the Xcel bill, the current proposal allows for this type of “building subscription” arrangement but ensures that low-income tenants enter into it knowingly and voluntarily. The proposal thus appropriately balances the goals of making solar gardens accessible to residents of rental properties and protecting customers who need access to energy assistance. Xcel’s opt-in/opt-out proposal should be approved.

Xcel’s tariff proposal also provides several protections for tenants who voluntarily opt into building-subscription CSGs. These protections include requirements that landlords not disconnect tenants for nonpayment of electric charges; that landlords not bring a nonpayment eviction action

⁵ *Id.*, sheets 99.1–2.

solely based on unpaid electric service charges; that landlords offer payment agreements to tenants in arrears; and that landlords apply partial payments toward rent before applying it toward electricity charges. These and other consumer-protection conditions included in the proposed tariff revisions would greatly benefit low-income households participating in building-subscription CSGs and should be approved.

Finally, the proposal would lower the usage threshold for PowerOn eligibility from 750 to 300 kWh per month. From conversations with the Company, the OAG understands that this lower threshold is consistent with what the Company’s current practice already is—i.e., Xcel already offers PowerOn to customers with lower usage than 750 kWh as funding allows. And because lowering the threshold is consistent with current practice, the OAG understands that the Company does not expect the cost of the program to change as a result of this formal change to the tariff. The OAG supports modifying the PowerOn tariff to make it consistent with current practice.

II. MAKING SOLAR GARDENS “REASONABLY ACCESSIBLE” DOES NOT REQUIRE ACCOMMODATING THE BUILDING SUBSCRIPTION MODEL.

The Community Solar Garden Statute requires that any solar-garden program approved by the Commission “reasonably allow for the creation, financing, and accessibility of community solar gardens” and be consistent with the public interest.⁶ The statute thus requires the Commission to approve program parameters that will make solar gardens as accessible as reasonably possible considering the various policies and interests at play. It does not require the Commission to prioritize the creation, financing, and accessibility of solar gardens above all other goals. Nor does it require the Commission to modify unrelated programs, such as PowerOn, to accommodate landlords’ or solar-garden operators’ business models.

⁶ Minn. Stat. § 216B.1641(e)(1), (4).

As discussed earlier, Xcel's current proposal reasonably balances the competing goals of making solar gardens reasonably accessible and ensuring that low-income tenants have access to energy assistance. While the OAG previously recommended that PowerOn be modified to provide benefits to low-income tenants that are not Xcel account holders, such as tenants participating in building-subscription CSGs, the OAG is no longer persuaded that the benefits of doing so would justify the costs.

Xcel has identified significant challenges to administering PowerOn benefits to tenants that are not the named customer on the bill.⁷ Moreover, as the Joint Petitioners have pointed out, there are risks to tenants when they are no longer an Xcel account holder and are rebilled for utility service by their landlord or a third party. Modifying PowerOn to accommodate building CSG subscriptions would tend to magnify these risks by encouraging vulnerable customers to give up control of their utility accounts and the regulatory protections that come with it.

On the other side of the scale, the benefits of modifying PowerOn to accommodate this arrangement appear minimal. In part, this is because the universe of affected tenants is small: Sagiliti, a third-party biller involved in this docket, stated that out of the more than 4,000 tenants that it rebills in Xcel's service territory, only 120 or so reside in buildings with an associated solar garden.⁸ It is likely that not all these tenants are low-income. This means that Xcel would have to incur significant administrative costs to address an issue that affects relatively few tenants. Perhaps more important is the fact that the building subscription model is not needed for tenants to participate in community solar. Low-income tenants can already access both energy assistance and community solar by opting out of a building-subscription CSG, taking over the Xcel account for their unit, and subscribing directly to a solar garden. Since building subscriptions are not

⁷ Xcel Compliance Filing at 16–17.

⁸ *Id.* at 18.

necessary for residential tenants to participate in community solar, there appears to be no urgent need to modify PowerOn to accommodate this arrangement.⁹

CONCLUSION

For the foregoing reasons, the Commission should approve Xcel's proposed revisions to its community-solar-garden program tariff.

Dated: December 21, 2022

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

/s/ **Peter G. Scholtz**

PETER G. SCHOLTZ
Assistant Attorney General
Atty. Reg. No. 0389936

445 Minnesota Street, Suite 1400
St. Paul, Minnesota 55101-2131
(651) 757-1473 (Voice)
(651) 296-9663 (Fax)
peter.scholtz@ag.state.mn.us

ATTORNEYS FOR OFFICE OF
THE ATTORNEY GENERAL—
RESIDENTIAL UTILITIES DIVISION

⁹ The OAG recognizes that third-party billing arrangements exist outside the building-subscription CSG context. However, there is not a record in this case to support changes to PowerOn based on that broader context, nor is it apparent why landlords' preference for a certain billing arrangement should shape utility energy-assistance programs.



The Office of
Minnesota Attorney General Keith Ellison
helping people afford their lives and live with dignity and respect • www.ag.state.mn.us

December 21, 2022

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

Re: *In the Matter of the Petition of Northern States Power Company for Approval of its Proposed Community Solar Garden Program*
MPUC Docket No. E-002/M-13-867

In the Matter of Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility
MPUC Docket No. E-002/M-21-695

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ **Peter G. Scholtz**

PETER G. SCHOLTZ

Assistant Attorney General

(651) 757-1473 (Voice)

(651) 296-9663 (Fax)

peter.scholtz@ag.state.mn.us

CERTIFICATE OF SERVICE

Re: *In the Matter of the Petition of Northern States Power Company for Approval of its Proposed Community Solar Garden Program*
MPUC Docket No. E-002/M-13-867

In the Matter of Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility
MPUC Docket No. E-002/M-21-695

I, JULIE ANN JEPPESEN, hereby certify that on the 21st day of December, 2022, I e-filed with eDockets *Comments of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list as receiving Electronic Service by e-mail and/or electronic submission.

/s/ Julie Ann Jeppesen
JULIE ANN JEPPESEN

CERTIFICATE OF SERVICE

Re: *In the Matter of the Petition of Northern States Power Company for Approval of its Proposed Community Solar Garden Program*
MPUC Docket No. E-002/M-13-867

In the Matter of Xcel Energy's Tariff Revisions Updating Community Solar Garden Tariff Providing Additional Customer Protections in Subscription Eligibility
MPUC Docket No. E-002/M-21-695

I, PATRICIA JOE JOTBLAD, hereby certify that on the 21st day of December, 2022, I served a true and correct copy of the document(s) identified above upon all parties listed on the attached service list as receiving “Paper Service” by United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Patricia Joe Jotblad
PATRICIA JOE JOTBLAD

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_13-867_Official
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_13-867_Official
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St Denver, CO 80204-8020	Electronic Service	No	OFF_SL_13-867_Official
Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_13-867_Official
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC	855 Village Center Drive #256 North Oaks, MN 55127	Electronic Service	No	OFF_SL_13-867_Official
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
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_13-867_Official
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_13-867_Official
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_13-867_Official

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_13-867_Official
Timo hy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures	3500 Bloomington Ave. S Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_13-867_Official
Betsy	Engelking	betsy@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_13-867_Official
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_13-867_Official
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_13-867_Official
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_13-867_Official
Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_13-867_Official
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development Ilc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_13-867_Official
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_13-867_Official
Sean	Gosiewski	sean@afors.org	Alliance for Sustainability	2801 21st Ave S Ste 100 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
Scott	Greenbert	scott@nautilusolar.com	Nautilus Solar Energy, LLC	396 Springfield Ave, Ste 2 Summit, NJ 07901	Electronic Service	No	OFF_SL_13-867_Official
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_13-867_Official
Reuben	Hunter	bhunter@madisonenergy.com	Madison Energy Investments	8100 Boone Blvd Suite 430 Vienna, VA 22182	Electronic Service	No	OFF_SL_13-867_Official
John S.	Jafray	jjafray@jjrpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_13-867_Official
Julie	Jorgensen	juliejorgensen@greenmark solar.com	Greenmark Solar	4630 Quebec Ave N New Hope, MN 55428-4973	Electronic Service	No	OFF_SL_13-867_Official
Ralph	Kaehler	Ralph.Kaehler@gmail.com		13700 Co. Rd. 9 Eyota, MN 55934	Electronic Service	No	OFF_SL_13-867_Official

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_13-867_Official
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_13-867_Official
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No	OFF_SL_13-867_Official
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_13-867_Official
Aaron	Knoll	aknoll@greeneespeil.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_13-867_Official
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200 Wayzata, MN 55391	Electronic Service	No	OFF_SL_13-867_Official
Alice	Madden	alice@communitypowermn.org	Community Power	2720 E 22nd St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_13-867_Official
Jason	Maur	jason.maur@renesolapower.com	Renesola Power Holdings, LLC	850 Canal Street 3rd Floor Stamford, CT 06902	Electronic Service	No	OFF_SL_13-867_Official
Matthew	Melewski	matthew@nokomisenergy.com	Nokomis Energy LLC & Ole Solar LLC	2639 Nicollet Ave Ste 200 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Melone	Thomas.Melone@AllicoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_13-867_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Marc	Miller	mmiller@solstage.com	Soltage, LLC	66 York Street, 5 h Floor Jersey City, NJ 07302	Electronic Service	No	OFF_SL_13-867_Official
Marcus	Mills	Marcus@communitypowermn.org	Community Power	2720 E 22nd St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_13-867_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Pouya	Najmaie	pouya@cooperativeenergyfutures.com	Cooperative Energy Futures	3416 16th Ave S Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_13-867_Official
Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association	2288 University Ave W St. Paul, MN 55114	Electronic Service	No	OFF_SL_13-867_Official
Patty	O'Keefe	patty.okeefe@sierraclub.org		2525 Emerson Ave S Apt 2 Minneapolis, MN 55405	Electronic Service	No	OFF_SL_13-867_Official

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_13-867_Official
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_13-867_Official
Eric	Pasi	ericp@ips-solar.com	IPS Solar	2670 Patton Rd Roseville, MN 55113	Electronic Service	No	OFF_SL_13-867_Official
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_13-867_Official
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_13-867_Official
Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now	N/A	Electronic Service	No	OFF_SL_13-867_Official
Paula	Prahl	paula.prahl@dominiuminc.com	Dominium	2905 Northwest Blvd Ste 150 Plymouth, MN 55441	Electronic Service	No	OFF_SL_13-867_Official
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 5510212131	Electronic Service	Yes	OFF_SL_13-867_Official
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_13-867_Official
Jonathan	Roberts	jroberts@soltag.com	Soltag	66 York St 5th Floor Jersey City, NJ 07302	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Delaney	Russell	delaney@mnipl.org	Just Solar Coalition	4407 E Lake Street Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
Kyle	Samejima	kyle@mplsclimate.org	Minneapolis Climate Action	N/A	Electronic Service	No	OFF_SL_13-867_Official
Ian	SantosMeeker	ians@ips-solar.com	IPS Solar	N/A	Electronic Service	No	OFF_SL_13-867_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_13-867_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-867_Official
David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions	2303 Wycliff St Ste 300 St. Paul, MN 55114	Electronic Service	No	OFF_SL_13-867_Official
Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC	233 Park Ave S Ste 201 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
Ralph J	Solar Consulting	N/A	IPS Solar	821 Raymond Ave Ste. 400 St. Paul, MN 55114	Paper Service	No	OFF_SL_13-867_Official
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_13-867_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light	N/A	Electronic Service	No	OFF_SL_13-867_Official
Anna	Tobin	atobin@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Zack	Townsend	zachary.townsend@brookfielddrenewable.com	Brookfield Renewable	200 Liberty St FL 14 New York, NY 10281	Electronic Service	No	OFF_SL_13-867_Official
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_13-867_Official
John	Vaughn	jvaughn@rreal.org	Rural Renewable Energy Alliance	3963 8th Street SW Backus, MN 55435	Electronic Service	No	OFF_SL_13-867_Official
Kevin	Walker	KWalker@beaconinterfaith.org	Beacon Interfaith Housing Collaborative	N/A	Electronic Service	No	OFF_SL_13-867_Official
Jessica	Welk	jwelk@sherman-associates.com	Sherman Associates	233 Park Avenue South Suite 201 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_13-867_Official
Curtis P	Zaun	curtis@cpzlaw.com	Attorney At Law	3254 Rice Street Little Canada, MN 55126	Electronic Service	No	OFF_SL_13-867_Official

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 Center	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
Timo hy	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@xcelenergy.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@cupminnesota.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@lsr.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 Ilc	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@nautilusolar.com	Nautilus Solar Energy, LLC	396 Springfield Ave, 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@madison1.com	Madison Energy Investments	8100 Boone Blvd Suite 430 Vienna, VA 22182	Electronic Service	No	OFF_SL_21-695_21-695
John S.	Jaffray	jjafray@jipower.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 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@AllicoUS.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@Sagiliti.com	J-I-T Services, Inc.	N/A	Electronic Service	No	OFF_SL_21-695_21-695
Marc	Miller	mmiller@solstage.com	Soltage, LLC	66 York Street, 5 h 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	nordstrom@gpisd.net	Great Plains Ins itute	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 Associa ion	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 5510212131	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@soltag.com	Soltag	66 York St 5th Floor Jersey City, NJ 07302	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
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@mnplclimate.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 7 h Pl 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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Zack	Townsend	zachary.townsend@brookfieldrenewable.com	Brookfield Renewable	200 Liberty St FL 14 New York, NY 10281	Electronic Service	No	OFF_SL_21-695_21-695
Pat	Treseler	pat.icplaw@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.org	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