

**STATE OF MINNESOTA  
MINNESOTA PUBLIC UTILITIES COMMISSION**

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

Docket Nos. E002/M-21-695  
E002/M-13-867

In the Matter of the Petition of Northern  
States Power Company, D/B/A Xcel  
Energy, for Approval of its Proposed  
Community Solar Garden Program

**JOINT REPLY COMMENTS OF  
TBR, LLC, SOLAR HOLDINGS LLC,  
AND COOPERATIVE ENERGY  
FUTURES REGARDING XCEL  
ENERGY'S COMPLIANCE FILING**

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**I. INTRODUCTION**

TBR, LLC (TBR), Solar Holdings LLC (Solar Holdings) (collectively, the Community Solar Garden Operators or CSG Operators) and Cooperative Energy Futures (CEF) submit these joint reply comments in response to the Minnesota Public Utilities Commission's (Commission) Notice of Comment Period, issued November 22, 2022, regarding Xcel Energy's (Xcel) compliance filing submitted on November 11, 2022.

CEF and the CSG Operators both operate community solar gardens (CSGs) that serve tenants; although CEF and the CSG Operators use different business models to do so. CEF is a member-owned cooperative whose subscribers to its CSGs include tenants in multi-family buildings and affordable housing operators. Subscribing tenants chose to participate by signing a subscription agreement. Subscribing affordable housing operators directly pay for unit-metered electric costs and do not rebill those costs to its tenants. The CSG Operators are private entities focused on providing community solar access to tenants. Previously described as the Building

Subscription Model (BSM), the landlord holds the tenant accounts in the name of the building to administer the BSM and rebills the net electricity costs to tenants.

The CSG Operators support modifications that would change its business model to offer more flexible terms and consumer protections. Specifically, under the current proposal before the Commission, tenants would be required to opt in and could opt out for any reason. Landlords, who hold the Xcel accounts for the building's metered units and rebill tenants, would be required to report the names of tenants who have opted in and opted out to Xcel on a monthly basis. With these tariff modifications, the CSG Operators' BSM model would align more closely with a typical CSG subscription but tenants would continue to pay a single bill (combining the CSG subscription and electricity payments along with rent); the complexity of a two-bill system for the subscriber (requiring the subscriber to pay Xcel for their electricity and the CSG Operator for their subscription) is removed when the landlord is the Xcel account holder.

Although CEF and the CSG Operators have different approaches and philosophies, we share a commitment to developing and operating CSGs that broadly advance clean energy access and benefits to tenants and low-income households, and we are committed to expanding access to low-income programs for tenants. Throughout this docket, CEF and the CSG Operators have undertaken extensive efforts to build a shared understanding of the operating models, tenant benefits, and affordability program implications at stake in this proceeding.

CEF and the CSG Operators participated in all four stakeholder meetings. Although the opt-in/opt-out approach reached by stakeholders does not reflect a comprehensive solution for the wide range of issues identified in the Commission's June 24, 2022 Order, we support this approach as a step in the right direction. CEF and the CSG Operators share concerns regarding several of Xcel's proposed tariff revisions to the Standard Contract for Solar\*Rewards Community described

in the initial comments of TBR and Solar Holdings as onerous and unnecessary—some of which encroach on landlord-tenant law.<sup>1</sup>

CEF and the CSG Operators oppose Xcel's request to reopen Order Point 2.B of the Commission's order, issued on June 24, 2022, which requires Xcel to propose modifications to its tariffs to allow low-income renters who are subject to third-party billing to access its affordability programs. We do not believe the Joint Petitioners (Xcel, Energy Cents Coalition, Mid-Minnesota Legal Aid, and the Citizens Utility Board of Minnesota) made a good faith effort to address the Commission's directive to ensure that low-income tenants in buildings who are rebilled by the landlord, which can occur with or without community solar subscriptions, are not excluded from Xcel's affordability programs.

## **II. Xcel's Proposed CSG Tariff Modifications Go Too Far**

The stakeholder group developed an opt-in/opt-out approach to tenant participation in CSGs that was acceptable to all parties and provides clear choice and protections for tenants. Nevertheless, some of Xcel's proposed tariff modifications did not have broad support of the stakeholder group and fall outside the scope of this proceeding.

In their initial comments filed on December 21, 2022, the CSG Operators provided amendments to Xcel's proposed tariff modifications to the Standard Contract for Solar\*Rewards Community regarding tariff sheets 9-66.1, 9-76, 9-74, and 9-99.1-.3.<sup>2</sup> CEF supports the CSG Operators' amendments, which address Xcel's proposed language within the standard contract and its addendum (i.e., the redlines to tariff sheets 9-66.1, 9-76, 9-74, and 9-99.1-.3) for reasons articulated in the CSG Operators' initial comments. CEF and the CSG Operators strongly support

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<sup>1</sup> TBR and Solar Holding Initial Comments at 5-10 (Dec. 21, 2022).

<sup>2</sup> *Id.* at 5-6, 9-10, Attachment A.

protecting renters' rights as they relate to utility service; however, the Commission is not necessarily the proper venue for some of these tariff modifications.

The CSG Operators support exempting landlords who have been an Xcel account holder for metered units continuously since 2015 from the addendum in tariff sheets 9-99.1-3. CEF appreciates this clarification that explicitly exempts property owners who have a direct CSG subscription, but do not rebill tenants for their electricity usage, from the Landlord Addendum. CEF works with several nonprofit affordable and supportive housing communities where this is a common practice.

In its Landlord Addendum (tariff sheets 9-99.1-2), Xcel proposes several provisions that do not serve to protect consumers beyond the other provisions included in the addendum. As discussed in the CSG Operators' initial comments, sections 4.j, 4.l, and 4.m of the addendum serve to penalize landlords offering access to community solar by creating an unlevel playing field among landlords. Landlords who offer community solar access would face additional administrative burdens and costs compared to other landlords who rebill tenants for their electricity usage but do not participate in community solar. The remaining provisions—which we support—ensure rent is paid first in the event of underpayment; ensure tenants cannot be evicted for unpaid electric bills; ensure tenants cannot be assessed additional fees unless explicitly permitted by law or late fees exceeding thresholds established in the tariff; require specific disclosures to tenants; and require the landlord to provide a dispute resolution process. And, of course, the landlord cannot disconnect a tenant's unit from service as a matter of law. These provisions offer ample protections without deterring landlords from offering access to community solar as a building amenity. CEF and the CSG Operators support Xcel's proposed opt-in form (tariff sheet 9-99.3) but note that the language assumes that tenants would already have an Xcel account. New tenants moving to the

building may not have an Xcel account. In those cases, some of the language would not be applicable.

The unrestricted opt-out provision ensures tenants can receive any statutory protection required of Xcel, including payment agreements and billing plans, rendering sections 4.j, 4.l, and 4.m unnecessary. Moreover, applying these statutory requirements to landlords encroaches on landlord-tenant law. For example, substituting the word “utility” with “landlord” in Minnesota Statutes section 216B.098, subdivisions 2, 3, and 5, would regulate landlords as if they were a utility solely because their properties are affiliated with community solar. The Commission was created by statute and has only those powers granted to it by the legislature.<sup>3</sup> Treating landlords like utilities would be an overreach of the Commission’s legal authority. The proper venue to change landlord-tenant law is the legislature.

The CSG Operators’ amendments to Xcel’s tariff revisions to its Standard Contract for Solar\*Rewards Community strike the appropriate balance between providing access to community solar to renters while protecting tenants consistent with Minnesota Statutes section 216B.1641 and past Commission orders.<sup>4</sup> These amendments are minimal and designed to amend areas where Xcel’s proposal exceeds the common understanding reached by the stakeholders and attempts to redefine the relationship between the landlord and tenant. Although CEF and the CSG Operators may differ regarding the ideal relationship between landlords and tenants, we agree that this docket is not the appropriate venue to redefine the landlord-tenant relationship. We are united in our position that these issues are fundamentally about the rights and responsibilities of landlords rather

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<sup>3</sup> *Peoples Nat. Gas Co. v. Minn. Pub. Utils. Comm’n*, 369 N.W.2d 530, 534 (Minn. 1985) (quoting *Great Northern Railway Co. v. Public Service Comm’n*, 284 Minn. 217, 220, 169 N.W.2d 732, 735 (1969)).

<sup>4</sup> E.g., *In re the Northern States Power Company, d/b/a/ Xcel Energy, for Approval of its Proposed Community Solar Garden Program*, MPUC Docket No. E-002/M-13-867, Order Rejecting Xcel’s Solar-Garden Tariff Filing and Requiring the Company to File a Revised Solar-Garden Plan (Apr. 7, 2014).

than community solar. Landlords seeking to deliver the benefits of community solar subscriptions to tenants should not be singled out by burdening landlords with onerous requirements that can add significant administrative costs. Regulating landlords who rebill tenants for their electric use, regardless of whether community solar is a factor, is a matter for the legislature.

### **III. Low-Income Tenants Deserve to Access Xcel's Affordability Programs and Community Solar**

CEF and the CSG Operators found that Xcel failed to meaningfully address low-income tenant access to its affordability programs during the stakeholder process. Throughout the course of this docket, CEF and the CSG Operators each identified the failure of Xcel's affordability programs to accommodate the needs of the low-income tenants whose landlords chose to take over utility service and rebill tenants. The Commission sought to remedy this inequity by requiring Xcel to propose modifications to its tariff to allow low-income tenants who are subject to third-party billing to access its affordability programs in Order Point 2.B of its June 24, 2022 Order. The Joint Petitioners effectively ignored this order point during the stakeholder process despite repeated attempts by stakeholders to seek a solution. The Minnesota Solar Energy Industries and the Coalition for Community Solar Access made a similar observation in their initial comments.<sup>5</sup>

CEF and the CSG Operators are concerned that Xcel's actions during the stakeholder process and its request to reopen Order Point 2.B reflect an unwillingness to resolve the root of the problem and conflates the impacts of landlord rebilling with landlord participation in community solar. Landlords may choose to rebill for utility service for reasons other than community solar. Although Xcel's proposed CSG tariff modifications as amended by the CSG Operators provide

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<sup>5</sup> Minnesota Solar Energy Industries and the Coalition for Community Solar Access Initial Comments at 5-6, 9 (Dec. 21, 2022).

tenants recourse when a landlord is participating in community solar, it does nothing for tenants who are rebilled for other reasons. Rather than seeking a proposed solution, as ordered by the Commission, that creates access for all low-income tenants, some parties seem too willing to dismiss such efforts as too costly or impractical.<sup>6</sup>

Several commenters, including Mid-Minnesota Legal Aid (MMLA) and Legal Services Advocacy Project (LSAP), referenced the definition of customer found in a Minnesota rule governing utility customer service, Minnesota Rule 7820.0700, to exclude customers being rebilled by their landlord despite the fact that low-income tenants receive low-income home energy program (LIHEAP) benefits and Xcel is responsible for the tenant's meter.<sup>7</sup> Under the canons of statutory interpretation, the language of the statutory text should serve as the starting point for any inquiry into its meaning. As raised in the initial comments of the CSG Operators and MnSEIA, the Minnesota Legislature intended that recipients of LIHEAP benefits qualify to receive benefits from Xcel's affordability programs.<sup>8</sup> Minnesota Statute section 216B.16, subds. 14 and 15, explicitly define "low-income residential ratepayers" as "ratepayers who receive energy assistance from the low-income home energy program (LIHEAP)."<sup>9</sup> Relying on a definition for a term (i.e., "customer") not found in section 216B.16 but found in an administrative rule unrelated to low-income affordability programs, and ratemaking in general, does not adhere to the canons of statutory interpretation. Minnesota Statutes chapter 216B does not define the term "ratepayer," but links LIHEAP recipients with "ratepayers."

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<sup>6</sup> Xcel Energy Compliance Filing at 14 (Nov. 11, 2022); Office of the Attorney General Initial Comments at 6 (Dec. 20, 2022); Citizens Utilities Board of Minnesota Initial Comments at 7 (Dec. 21, 2022).

<sup>7</sup> Mid-Minnesota Legal Aid and Legal Services Advocacy Project Joint Initial Comments at 6 (Dec. 21, 2022); Citizens Utilities Board of Minnesota at 3 (Dec. 21, 2022) (stating that this definition should not be read to include a tenant whose account is held in the name of a third party);

<sup>8</sup> CSG Operators Initial Comments at 11-12 (Dec. 21, 2022); MnSEIA Initial Comments at 10-11 (Dec. 21, 2022).

<sup>9</sup> Minn. Stat. § 216B.16, subd. 15(a).

Setting aside that Minnesota rule 7820.0700 does not apply to the statute governing Xcel's affordability programs, MMLA and LSAP's interpretation of this definition to argue that only the account holder is considered the "customer" is incorrect.<sup>10</sup> Minnesota rule 7820.0700 states that a "[c]ustomer means any person, firm, association or corporation, or any agency of the federal, state, or local government, *being supplied with service by a utility*, subject to the jurisdiction of this commission."<sup>11</sup> An important aspect of this definition is that the customer is supplied with service by the utility. In this case, the tenant is being supplied with service by Xcel because the unit in which they live has a meter controlled by Xcel. The tenant pays for their usage based on their unit's meter after they are rebilled by the landlord. This practice allows landlords to ensure electricity bills are paid on time while offering tenants the convenience of making a single payment that includes rent and utilities. An important fact in this arrangement is that the utility continues to supply electric service to each individual unit.

It is important to distinguish residential buildings with separately metered units installed and operated by Xcel, where tenants are rebilled by the landlord or the landlord's billing service provider, from submetered units installed and operated by the landlord and single-metered buildings. The Minnesota Legislature has addressed submetering and single-metered residential buildings.<sup>12</sup> The Minnesota Legislature has not addressed the scenario where the landlord has taken over separately metered units controlled by Xcel in residential buildings (synchronized billing is used to consolidate billing statements for the building's units and detailed billing information is provided for each unit). The bottom line is that if the Minnesota Legislature intended to prohibit

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<sup>10</sup> See Mid-Minnesota Legal Aid and Legal Services Advocacy Project Joint Initial Comments at 6 (Dec. 20, 2022).

<sup>11</sup> Minn. R. 7820.0700, subp. 1 (emphasis added).

<sup>12</sup> Minn. Stat. §§ 216B.022, 504B.215.

tenants receiving LIHEAP benefits from qualifying for Xcel's affordability programs because the tenant is being rebilled by their landlord instead of paying Xcel directly, it could have done so.

The Energy Cents Coalition (ECC), the Office of Attorney General (OAG), and Xcel argued that the benefits of providing access to Xcel's affordability programs to tenants who are rebilled by a landlord or third-party service provider are minimal because only approximately 120 tenants would be affected, which would not outweigh administrative costs.<sup>13</sup> The pool of excluded low-income tenants is likely higher because landlords not participating in this docket (e.g., because their buildings are not associated with a community solar garden) have taken over utility payments of Xcel-controlled, individually metered units. Although a clear majority of landlords place meters in the name of the tenant, there is growing interest among landlords to be the account holder for all metered units as a tenant convenience and where there are high tenant turnover rates or subleasing. Excluding a group of low-income tenants as not significant enough to justify overcoming the challenges of modifying the Low Income Energy Discount Rider is poor public policy and fails to address the root issue underlying the loss of affordability benefits.

Agreeing with Xcel, the Citizens Utility Board of Minnesota (CUB) stated that complying with Order Point 2.B "contemplates actions that will likely be impractical and challenging to implement in a way that fully addresses the key problems underlying the Building Subscription Model."<sup>14</sup> Although challenges to modify Xcel's tariff to accommodate low-income tenants who are not directly billed by Xcel exist, impacts from modifying the tariff in compliance with Order Point 2.B would reach low-income tenants beyond those affected by landlords offering community solar access. The CSG Operators' amendments to Xcel's tariff modifications to the Standard

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<sup>13</sup> Office of Attorney General Initial Comments at 6 (Dec. 21, 2022); Energy Cents Coalition at 4 (Dec. 21, 2022); Xcel Compliance Filing at 18 (Nov. 11, 2022).

<sup>14</sup> Citizens Utilities Board of Minnesota at 7 (Dec. 21, 2022).

Contract for Solar\*Rewards Community would address the problems raised in this docket associated with the BSM. Compliance with Order Point 2.B would address the problem of excluding low-income LIHEAP recipients from Xcel's affordability programs simply because they are not billed directly by Xcel.

Providing access to Xcel's affordability programs to tenants who are rebilled by their landlord or another third-party is neither an insignificant nor impossible hurdle to solve. We are pleased that the Department of Commerce has already ensured access to LIHEAP to tenants in this situation. If it can be done for LIHEAP, we are confident that Xcel and ECC are capable of adapting and designing program changes to ensure that all qualifying low-income tenants have access. Additionally, Xcel failed to comply with Minnesota Statutes section 216B.27 and Minnesota Rule 7829.2800 and apply for reconsideration and instead is requesting the Commission reconsider Order Point 2.B in its compliance filing. We request that the Commission reinforce its commitment to Order Point 2.B and direct Xcel to develop program modifications.

Finally, we support CUB's recommendation that the average monthly consumption threshold included in the Low Income Discount Rider be eliminated.<sup>15</sup>

#### **IV. CONCLUSION**

Despite a few challenges, the stakeholder process led to significant progress. The opt-in/opt-out approach provides a solid foundation for increasing options for tenants who reside in buildings that offer access to community solar via a model that requires utility rebilling by the landlord. The proposed tariff modifications to the Standard Contract for Solar\*Rewards Community as amended by the CSG Operators strike the appropriate balance of statutory goals for

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<sup>15</sup> Citizens Utilities Board of Minnesota at 6 (Dec. 21, 2022).

community solar gardens and consumer protections without imposing unnecessary and overreaching burdens on landlords providing access to community solar.

CEF and the CSG Operators respectfully request that the Commission:

1. Adopt the CSG Operators' amendments to 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-.3. These modest amendments align with the stakeholder intentions of providing consumer protections while avoiding jurisdictional overreach and adding unnecessary and costly administrative burdens on landlords providing community solar.
2. Reaffirm Order Point 2.B to ensure all rebilled low-income tenants, regardless of whether their building is associated with community solar, have access to Xcel's affordability programs.
3. Support eliminating the average monthly electric consumption threshold on tariff sheet 5-95.

Dated: January 18, 2023

Respectfully submitted,

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## CERTIFICATE OF SERVICE

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Joint Reply Comments of TBR, LLC, Solar Holdings LLC, and Cooperative Energy  
Futures

Docket Nos. E002/M-21-695 and E002/CI-13-867

Dated this 18<sup>th</sup> day of January 2023.

/s/ Ingrid Bjorklund  
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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
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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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_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
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_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
Zack	Townsend	zachary.townsend@brookfielddrenewable.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.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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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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 551012131	Electronic Service	Yes	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jonathan	Roberts	jroberts@soltage.com	Soltage	66 York St 5th Floor Jersey City, NJ 07302	Electronic Service	No	OFF_SL_13-867_Official
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 7th Pl 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
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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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
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
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