

September 28, 2022

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

RE: **Reply Comments of the Minnesota Commerce Department, Division of Energy Resources**
Docket Nos. E999/CI-16-521, E999/CI-01-1023

Dear Mr. Seuffert:

On August 29, 2022, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Supplemental Comment Period* seeking comment on whether the Commission should revise or replace Attachment 6 of the September 28, 2004 Order in Docket No. E999/CI-01-1023 which creates guidelines for establishing terms of the financial relationship between an electric utility and a distributed generation customer with no more than 10 MW of capacity.¹

The Department is available to answer any questions the Minnesota Public Utilities Commission may have related to this matter.

Sincerely,

/s/ CHRIS WATKINS
Public Utilities Rates Analyst

CW/ar
Attachment

¹ *In the Matter of Establishing Generic Standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities under Minnesota Laws 2001, Chapter 212, ORDER ESTABLISHING STANDARDS*, Docket No. E999/CI-01-1023, September 28, 2004. Accessed at <https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={EB5DCE72-415A-4767-965F-35BA37EC59EA}&documentTitle=59785>



Before the Minnesota Public Utilities Commission

Reply Comments of the Minnesota Commerce Department Division of Energy Resources

Docket Nos. E999/CI-16-521, E999/CI-01-1023

I. INTRODUCTION

On September 28, 2004, the Minnesota Public Utilities Commission (Commission) issued an *Order Establishing Standards* in Docket No. E999/CI-01-1023. The September 2004 Order established the interconnection process, technical requirements, standard Interconnection Agreement, and methodology for calculating rates for Distributed Generation (DG) Systems.

In 2016, the Commission commenced the current proceeding to update the generic standards for the interconnection and operation of DG facilities established under §Minn. Stat. §216B.1611. To date, the Commission has issued an *Order Establishing Updated Interconnection Process and Standard Interconnection Agreement* (August 13, 2018), and an *Order Establishing Updated Interconnection and Interoperability Requirements* (January 22, 2020).

On August 28, 2020, the Commission issued a *Notice of Comment Period* seeking comment on whether the Commission should revise or replace Attachment 6 of the September 28, 2004 Order in Docket No. E999/CI-01-1023 (2004 Order) which creates the guidelines for establishing the terms of the financial relationship between an electric utility and a distributed generation customer with no more than 10 MW of capacity.

On October 28, 2020, the Minnesota Department of Commerce, Division of Energy Resources (Department) submitted comments recommending the Commission defer consideration of Attachment 6 revisions for at least six months.

On November 13, 2020, the Commission issued a Notice of Comment extending the comment period of the revision of Attachment 6 until April 30, 2021.

On May 20, 2021, the Department filed Reply Comments summarizing the positions of parties filing comments in the docket to date and recommending that the Commission undertake review of Attachment 6 in the following discrete steps:²

² Department Reply Comments, at 4. Docket No. E999/CI-16-521. May 20, 2021. Accessed at: <https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={40E48A79-0000-C318-89CA-03E63F496446}&documentTitle=20215-174353-02>

1. The Commission should more fully identify and evaluate areas where federal rules and statutes conflict with existing Attachment 6 requirements and undertake additional comments from stakeholders towards this end.
2. The Commission should then consider additional updates to Attachment 6 beyond those required to align with federal and state law, recognizing that this step may require significantly more time and record development.

Lastly, the Department recommended that the Commission explore the possible use of MISO market pricing for capacity needs to inform distributed generation pricing, as well as consider procedures for increasing transparency for DG-related pricing processes.

II. SUMMARY OF PARTY POSITIONS

On May 20, 2021 multiple parties filed reply comments coincidentally with the Department addressing the proposed revision process for Attachment 6, the Department briefly summarizes their positions here below.

A. XCEL ENERGY

Xcel provided a response to the initial comments in the instant docket from the Department of Commerce, MnSEIA/Joint Movants, and the Midwest Cogeneration Association/Heat Is Power Association. The Company addressed topics including customers' access to rate information, exclusion of merchant plants from the Commission's Order, legal issues regarding the applicability of statute and prior cases, and provided input on various specific questions regarding the guidance provided by Attachment 6.

Xcel voiced general agreement with the Department's suggestion that any approach to the modification of Attachment 6 should be transparent, understandable, and practical to administer through utility tariffs in consideration of other DG customers not contracted with the Company under the auspices of Attachment 6. The Company cautioned against the characterization of the Value of Solar (VOS) methodology as an avoided cost methodology that could inform the future revision of Attachment 6, noting that the inclusion of environmental benefits as an avoided cost in the VOS places the rate outside of PURPA and thus cannot be considered an "avoided cost" rate.³

Xcel responded to the following topics raised by MnSEIA/Joint Movants in their October 30 initial comments: 1) the transparency of rate information; 2) the pending appeal to obtain avoided cost information in annual PURPA filings to determine the avoided costs of utilities; 3) statutory implications of Minn. Stat. §216B.164 and Minn. Stat. §216B.1611 in relation to PURPA; 4) the Joint Movant's suggestion that Attachment 6 should be made applicable to merchant plants and not limit its

³ *Qualifying Facility Rates and Requirements Implementation Issues Under the Public Utility Regulatory Policies Act of 1978*, Order No. 872, 85 FR 54638 (Sep. 2, 2020), 172 FERC ¶ 61,041 (2020).

application to onsite generation; and 5) the impacts of the Commission's Red Lake Falls decision in Docket Nos. 16-1021 and 17-464.

B. DAKOTA ELECTRIC ASSOCIATION

Dakota Electric Association did not find that the comments filed on April 30, 2021 by the Otter Tail and Minnesota Power Companies raised new issues requiring a response from the Cooperative, and did not provide additional comments but referred the Commission to its October 30, 2020 comments for its position on the matter.

C. MnSEIA/Joint Movants

MnSEIA and the Joint Movants provided responses to initial comments from the Midwest Cogeneration Association/Heat is Power Association, the Department of Commerce, Minnesota Rural Electric Association (MREA), Otter Tail Power Company, and Xcel Energy and Minnesota Power.

The Joint Movants stated that the Minnesota DG Tariff is a standalone program authorized by Minnesota law and thus is not governed or preempted by PURPA or related FERC regulations and that Minnesota's PURPA implementation via Minn. Stat. §216B.164 does not control Attachment 6 or DG Tariffs enacted under the auspices of Minn. Stat. §216B.1611. The Joint Movants suggested that the Commission provide clarification that it does not intend to limit DG Tariff implementation in Minnesota by the requirements of PURPA and argued for beginning the reformation of the DG tariff process using variables from the VOS to inform the calculation methodology of Attachment 6.

III. DEPARTMENT COMMENTS

A. NO NEW SUBSTANTIVE COMMENT OR ANALYSIS FROM DEPARTMENT

The Department reiterates its position expressed in its May 20, 2021 reply comments recommending that the Commission undertake a discrete and measured approach to undertaking a review of Attachment 6. Currently the Department does not have any additional comment or analysis to provide in the record, noting that the main point of controversy between stakeholders resides in the interpretation of the application of Minnesota Statutes §216B.1611 and §216B.164 considering recent FERC revisions to rules governing PURPA. The Department thus again recommends that the first step undertaken by the Commission should be to narrow the scope of inquiry to the legal questions regarding potential conflicts between these various state and federal statutes and rules to ensure the sequential review of the final calculation methodology and rate design are appropriately sited within a shared understanding of the policy implications resulting from any changes to the pricing mechanism to be employed.

B. TIMING OF FURTHER PROCEEDINGS

The Commission may want to consider strategically timing its proceeding so that important information available starting in 2023 can inform parties' work. As utilities continue to deploy Advanced Metering Infrastructure (AMI) meters throughout their service territories and IEEE 1547-2018 compliant advanced inverters become commercially available throughout 2023 parties will have access to more granular data that can aid in the determination of avoided distribution system costs, and important lessons learned and ongoing data analysis of the impacts of time-of-use rates currently being piloted will also be available to enable a more accurate assessment of the time-sensitive impacts of DG on distribution system peak capacity and real-time energy market pricing. The increased visibility and transparency afforded by these developments can then be harnessed to begin to contemplate required changes to Attachment 6, should the Commission find that further modifications are necessary after stakeholders and the Commission reach a consensus on the alignment of Attachment 6 with applicable state statutes and federal law.

The Department appreciates the Commission's attention to these issues and is available to answer any questions the Commission may have at this time.

CERTIFICATE OF SERVICE

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

**Minnesota Department of Commerce
Supplemental Comments**

Docket No. E999/CI-16-521 and E999/CI-01-1023

Dated this **28th** day of **September 2022**

/s/Sharon Ferguson

[illegible]

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Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.	10710 Town Square Dr NE Ste 201 Minneapolis, MN 55449	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200 Minneapolis, MN 55420	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 Saint Paul, MN 55104-1850	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Matthew	Melewski	matthew@nokomisenergy.com	Nokomis Energy LLC & Ole Solar LLC	2639 Nicollet Ave Ste 200 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tim	Mergen	tmergen@meeker.coop	Meeker Cooperative Light And Power	1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Pontius	Mike	mpontius@mnpower.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Luther	Miller	Luther.C.Miller@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sergio	Navas	snavas@sundialsolarenergy.com	Sundial Energy, LLC	3363 Republic Ave Saint Louis Park, MN 55426	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ben	Nelson	benn@cmpasgroup.org	CMPMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Noble	noble@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc	P.O. Box 639 Tyler, MN 561780639	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Bethany	Owen	bowen@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Cezar	Panait	Cezar.Panait@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company	PO Box 496 215 S. Cascade St. Fergus Falls, MN 565370496	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Susan	Peirce	Susan.Peirce@state.mn.us	Department of Commerce	85 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jeff M	Peters	jeff.peters@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, MN 57109-8920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Wess	Pfaff	wes.pfaff@mrenergy.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Donna	Pickard	dpickardgsss@gmail.com	Genie Solar Support Services	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Crystal	Pomerleau	crystal.r.pomerleau@xcel energy.com	Xcel	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Elizabeth	Psihos	elizabeth.psihos@idealener gies.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Patrick	Quinn	pquinn@GREnergy.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Reinertson	michael.reinertson@avante nergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_16-521_Official Service List PUC
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC	1401 South Broadway Pelican Rapids, MN 56572	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Daniel	Rogers	dan@nokomispartners.com	Nokomis	2639 Nicollet Ave Ste 200 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electric Assn.	PO Box 529 24386 State Highway 4 Sleepy Eye, MN 56085	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kenric	Scheevel	Kenric.scheevel@dairylandpower.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, Wisconsin 54602	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Cooperative Electric	22636 U.S. Hwy. 59 Worthington, MN 56187	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power	1725 US Highway 12 E Suite 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Assn.	24386 State Hwy. 4, PO Box 529 Sleepy Eye, Minnesota 56085	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies	5810 Nicollet Ave Minneapolis, Minnesota 55419	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robyn	Sonstegard	robyn.s@northstarelectric.coop	North Star Electric Cooperative, Inc.	PO BOX 719 Baudette, MN 56623	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy	401 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric	22636 US Highway 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Bryant	Tauer	btauer@whe.org	Wright-Hennepin	6800 Electric Dr Rockford, MN 55373	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Peter	Teigland	pteigland@mnseia.org	Minnesota Solar Energy Industries Association	2288 University Ave W Saint Paul, MN 55114	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Emma Marshall	Torres	emarshall-torres@convergentep.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jeff	Triplett	triplettj@powersystem.org	MREA	10710 Town Square Dr NW St 201 Minneapolis, MN 55449	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric	22636 US Hwy. 59 P.O. Box 788 Worthington, MN 56187-0788	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Craig	Turner	cturner@dakotaelectric.com	Dakota Electric Association	4300 - 220th Street West Farmington, MN 550249583	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ellen	Veazey	lveazey@solarunitedneighbors.org	Solar United Neighbors	1350 Connecticut Ave NW Ste 412 Washington, DC 20036	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sam	Villella	sdvillella@gmail.com		10534 Alamo Street NE Blaine, MN 55449	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Wendy	Vorasane	wendy.vorasane@idealenergies.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities	208 S Walnut Ave PO BOX 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Elizabeth	Wefel	eawefel@flaherty-hood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John	Williamson	John.Williamson@state.mn.us	Minnesota Department of Labor and Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Danielle	Winner	danielle.winner@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive P.O. Box 88920 Sioux Falls, SD 57108-8920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Renee	Doyle		Doyle Electric Inc.	PO Box 295 Amboy, MN 56010	Paper Service	No	OFF_SL_1-1023_Official Service List
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_1-1023_Official Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_1-1023_Official Service List
Natalie	Haberman	townsend@fresh-energy.org	Fresh Energy	408 St Peter St # 350 St. Paul, Minnesota 55102	Electronic Service	No	OFF_SL_1-1023_Official Service List
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_1-1023_Official Service List
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_1-1023_Official Service List
John S.	Jaffray	jjaffray@jjrpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_1-1023_Official Service List
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_1-1023_Official Service List
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_1-1023_Official Service List
Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy	414 Nicillet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_1-1023_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.	10710 Town Square Dr NE Ste 201 Minneapolis, MN 55449	Electronic Service	No	OFF_SL_1-1023_Official Service List
Jennifer	Miao	jmiao@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes St San Francisco, CA 94102	Electronic Service	No	OFF_SL_1-1023_Official Service List
Luther	Miller	Luther.C.Miller@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_1-1023_Official Service List
Michael	Noble	noble@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_1-1023_Official Service List
Bethany	Owen	bowen@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_1-1023_Official Service List
Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel	N/A	Electronic Service	No	OFF_SL_1-1023_Official Service List
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_1-1023_Official Service List
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	No	OFF_SL_1-1023_Official Service List
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_1-1023_Official Service List
Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_1-1023_Official Service List
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_1-1023_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_1-1023_Official Service List
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_1-1023_Official Service List
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_1-1023_Official Service List
Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_1-1023_Official Service List
Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy	401 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_1-1023_Official Service List
Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_1-1023_Official Service List
Peter	Teigland	pteigland@mnseia.org	Minnesota Solar Energy Industries Association	2288 University Ave W Saint Paul, MN 55114	Electronic Service	No	OFF_SL_1-1023_Official Service List
Craig	Turner	cturner@dakotaelectric.com	Dakota Electric Association	4300 - 220th Street West Farmington, MN 550249583	Electronic Service	No	OFF_SL_1-1023_Official Service List
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_1-1023_Official Service List