

June 17, 2019

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: COMPLIANCE FILING
UPDATING GENERIC STANDARDS FOR UTILITY TARIFFS FOR
INTERCONNECTION AND OPERATION OF DISTRIBUTED GENERATION
FACILITIES ESTABLISHED UNDER MINN. STAT. §216B.1611
DOCKET NOS. E999/CI-16-521 & E999/CI-01-1023

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed compliance filing in response to the Minnesota Public Utilities Commission's March 19 2019 ORDER AUTHORIZING FURTHER PROCEEDINGS. In particular, Order Point 3 which states:

3. *Within 90 days of the date of this order, Xcel, Minnesota Power, Otter Tail Power, and Dakota Electric Association shall file detailed descriptions of how they calculate their DG tariffed rates and negotiated DG rate offerings, including how they apply Attachment 6 in those calculations, for DG projects between 1 and 10 MW.*

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Amber Hedlund at amber.r.hedlund@xcelenergy.com or (612) 337-2268 or me at holly.r.hinman@xcelenergy.com. or (612) 330-5941 if you have any questions concerning this filing.

Sincerely,

/s/

HOLLY HINMAN
REGULATORY MANAGER

Enclosures
c: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Valerie Means	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF UPDATING THE
GENERIC STANDARDS FOR THE
INTERCONNECTION AND OPERATION OF
DISTRIBUTED GENERATION FACILITIES
ESTABLISHED UNDER MINN. STAT.
§216B.1611

DOCKET NO. E999/CI-16-521

IN THE MATTER OF UPDATING GENERIC
STANDARDS FOR UTILITY TARIFFS FOR
INTERCONNECTION AND OPERATION OF
DISTRIBUTED GENERATION FACILITIES
UNDER MINN. LAWS 2001 CH. 212

DOCKET NO. E999/CI-01-1023

COMPLIANCE FILING

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this compliance filing in response to the Minnesota Public Utilities Commission's March 19, 2019 ORDER AUTHORIZING FURTHER PROCEEDINGS. In particular the Company makes this compliance filing pursuant to Order Point 3, which states:

3. *Within 90 days of the date of this order, Xcel, Minnesota Power, Otter Tail Power, and Dakota Electric Association shall file detailed descriptions of how they calculate their DG tariffed rates and negotiated DG rate offerings, including how they apply Attachment 6 in those calculations, for DG projects between 1 and 10 MW.*

A. DG Tariffed Rate Calculations

The Commission established generic standards for interconnection and operation of distributed generation (DG) through its Order dated September 27, 2004, which included Attachment 6. Since the issuance of the 2004 Order there have been numerous DG dockets including the Company's customer programs driven by state

policy goals. Company tariffs, including those addressing DG, are approved after a public regulatory proceeding. We believe that the rates and contract for Solar*Rewards Community, for example, are well documented and well known to the Commission through the record developed in Docket No. E002/M-13-867. Similarly, the rates for the PV Demand Credit Rider are developed in Docket No. E999/CI-15-115.

These and other dockets such as Docket Nos. E999/R-13-729 (Rules Governing Cogeneration and Small Power Production), E002/M-16-222 (Tariff Modifications Implementing Rules on Cogeneration and Small Power Production), and E999/M-14-65 (Value of Solar Methodology) include tariffed DG rates that were developed following public regulatory proceedings.

The Company's tariffs with rates applicable to DG projects between 1 and 10 MW are identified in the table below.

Table 1. DG Tariff Rates

DG Tariff Rate	Short description	How Rate Is Developed
Tariff Sheets 9-64 through 9-110	Solar*Rewards Community – Community Solar Gardens. Available up to 1 MW (certain projects up to 5 MW were “grandfathered” into the program depending on when application was Deemed Complete and are therefore acknowledged here)	Compensation rates offered as a bill credit rate to program subscribers: either the “Applicable Retail Rate” or the Value of Solar Rate corresponding to an annual vintage. Some subscribers are also eligible to receive a residential adder. These rates arise from the regulatory proceeding in Docket No. E002/M-13-867 and are outside the 2004 Order and Attachment 6.
Tariff Sheet 10-76	One-Year Power Purchase Agreement energy rate table	Rates are developed pursuant to Minn. R. 7835 and are consistent with Attachment 6.
Tariff Sheet 5-125	PV Demand Credit Rider for greater than 40 kW	kWh-based credit for qualifying solar produced during designated on-peak times. Rates are not related to Attachment 6.

The One Year Power Purchase Agreement energy rate table is referenced on tariff sheet 10-76 consistent with the Commission's July 14, 2006 Order and related filings in *In the Matter of Xcel Energy's Petition for Approval of a Distributed Generation Tariff*, Docket No. E002/M-04-2055. The rates on Sheet 10-76 are calculated and updated annually in Schedule G of the January Cogeneration and Small Power Production filing. The most current filing is in Docket No. E999/PR-19-9. The content for Schedule G is developed pursuant to Minn. R. 7835 and is generally consistent with Attachment 6. Also, consistent with Minn. R. 7835, the rate calculations in Schedule G are for 5 years, while our tariff Sheet 10-76 references a one year rate.

The following table compares the provisions in Schedule G to corresponding parts of Attachment 6.

Table 2. Cogen and Small Power Production Rate

Minn. R. 7835	Attachment 6
7835.0100, Subp. 23: System incremental energy costs. "System incremental energy costs" means amounts representing the hourly energy costs associated with the utility generating the next kilowatt-hour of load during each hour.	Par. 6.a.i: System-wide hourly marginal incremental energy costs are calculated with a production model for each hour of the future year.
7835.1000: Schedule G must contain and describe all computations made by the utility in determining schedules A and B.	
7835.0500: Schedule A must contain the estimated system average incremental energy costs by seasonal peak and off-peak periods for each of the next five years. For each seasonal period, system incremental energy costs must be averaged during system daily peak hours, system daily off-peak hours, and all hours in the season. The energy costs must be increased by a factor equal to 50 percent of the line losses shown in schedule B. Schedule A must describe in detail the method used to determine the on-peak and off-peak hours and seasonal periods and must show the resulting on-peak and off-peak and seasonal hours selected.	Par. 6.a.i: Based on these costs [(referenced in Par. 6.a.i)], the average on-peak and off-peak marginal energy costs are calculated for each month.

The rates in Schedule G have limited applicability, and would not apply to a renewable energy source because Minn. Stat. §216B.164, Subd. 4, as quoted in the letter template provided as Attachment A to this filing, controls how rates for renewable energy sources are set. Also, pursuant to Minn. R. 7835.4019, enacted in 2015, parties are required to negotiate a contract to set the applicable avoided cost rates for qualifying facilities (QFs) of 1 MW or more.

7835.4019

QUALIFYING FACILITIES OF 1,000 KILOWATT CAPACITY OR MORE.

A qualifying facility with capacity of 1,000 kilowatt capacity or more must negotiate a contract with the public utility to set the applicable rates for payments to the customer of avoided capacity and energy costs. Nothing in parts 7835.4010 to 7835.4015 prevents a utility from connecting qualifying facilities of greater than 1,000 kilowatt capacity under its avoided cost rates.

B. Negotiated DG Rate between 1 and 10 MW

We use two different methods to negotiate a rate for QF projects between 1 and 10 MW. We use an RFP process and submit bid selections for Commission approval. We also offer avoided cost pricing that, depending on the type of facility, may include rates from tariff Sheet 10-76, rates informed by our least cost renewable PPA or facility, or LMP-based rates.

We have used a competitive bid RFP that resulted in the Aurora solar project. This consisted of numerous DG projects, each no more than 10 MW. This is discussed in *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Competitive Resource Acquisition Proposal and Certificate of Need*, Docket No. E002/CN-12-1240.

If a developer asks us about using the rate table at tariff sheet 10-76, we inform the developer that the rate table would not apply to a renewable energy source because, as noted above, Minn. Stat. §216B.164, Subd. 4 controls how rates for renewable energy sources are set. We also inform the developer that the rate table is only for five years, and is updated annually, with us proposing updated rates on the first business day following January 1 and if allowed these are typically made applicable beginning in April. This would result in a five year term for the PPA that relies on the rate table on Sheet 10-76. If the developer is proposing a project that is not renewable energy, once it has established a legally enforceable obligation (LEO) we can provide the developer a Confidentiality agreement to sign so that we can provide the non-public tariffed energy rate table. But, to help set expectations, as shown in the letter template, we inform the developer early on that the rates in tariff Sheet 10-76 currently are similar to the energy rates for our A52 rate code as set forth in our tariff at Sheet 9-3.

If a developer for a non-renewable energy source asks about a capacity rate, we inform the developer that, consistent with Attachment 6 and our tariff Sheets 10-77 through 10-79, the need for capacity must be established in the most recent Integrated Resource Plan, and a need exists if there is a shown deficit at any year of the 5-year planning period. Per the most recent Integrated Resource Plan (Commission Docket No. E002\RP-15-21), the Company forecasts a surplus position for system capacity and energy into 2025, and therefore there currently is no value to adding capacity prior to then. We have not been called upon to develop a negotiated capacity rate for a DG non-renewable energy source, but if called upon to do so the capacity rate would be based on our tariff Sheets 10-77 through 10-79 that were developed from Attachment 6.

When DG developers have approached us for a negotiated rate for a DG renewable energy source between 1 to 10 MW, our response is consistent with the letter template included here as Attachment A. The template letter is tailored depending on the applicable circumstances.

If interactions with the QF developer indicate that the developer may be interested in a LMP-based rate, we will also offer that. For example, we could offer an LMP-based rate structure minus an administrative fee, multiplied by the Net Energy produced by the facility.

Neither the least cost renewable energy bid rate, nor the LMP-based rate, are based on Attachment 6.

C. Process for Commission Review and Approval of DG PPAs

Our tariff on Sheet 9-8.2 provides details on the process to be followed when the Company enters into a PPA with a developer for a DG at various different nameplate capacities and term lengths. This tariff states:

DISTRIBUTED GENERATION PPAs WHERE RATE CODES A51-A56 DO NOT APPLY

If a qualifying facility (QF) has capacity of at least 40 kW AC but less than 1,000 kW AC and does not comply with the Individual System Capacity Limits, then the rate codes A51-A56 do not apply. These rate codes also do not apply, for example, where the QF or other distributed generation (DG) has a capacity of 1,000 kW AC or more. In circumstances where Rate Codes A51-A56 do not apply, then the Section 9 Uniform Statewide Contract also does not apply. Where the Section 9 Uniform Statewide Contract does not apply, the DG customer may apply for interconnection under the Company's Section 10 tariff. Whether the Company pays for energy or capacity delivered to it would depend on whether there is a power purchase agreement (PPA) and further depend on the rates, terms and conditions in the PPA. Nothing in this tariff shall be construed to obligate Company to enter into a PPA. The obligation to enter into such a PPA with a DG customer takes into consideration many factors, including whether there is a Legally Enforceable Obligation (LEO) of the Company to enter into such a PPA and the proposed rates, terms and conditions. The Company may also voluntarily enter into a PPA with a DG customer. Should a DG customer and Company enter into a PPA where the Section 9 Uniform Statewide Contract does not apply (and no other Section 9 tariffed contract applies, such as a Solar*Rewards contract), then the following procedures will apply:

1. If the DG is over 10 MW AC nameplate capacity, then the PPA along with the associated Interconnection Agreement will need to be approved by the Commission.
2. If the DG has a nameplate capacity of 40 kW up to and including 10 MW AC, and is for a term of more than 5 years, the Company shall file the PPA with the Commission and the Company shall be permitted to proceed with the PPA beginning 32 days after filing if no objection or intent to object is filed within 30 days of filing. If there is an objection or intent to object filed in this 30-day time frame, then the Commission will need to issue an order approving the PPA before the PPA is approved.
3. If the DG has a nameplate capacity of 40 kW up to and including 10 MW AC, and is for a term of 5 years or less, the Company may proceed with the PPA, but the Commission can examine the prudence of rates in the PPA during any request for rate recovery.
4. Notwithstanding the above, if the Commission has otherwise directed that a Commission order is needed for the PPA to be approved then that Commission directive shall apply.

CONCLUSION

We appreciate the opportunity to provide this compliance filing which discusses the origins of our DG tariffed and negotiated rates.

Dated: June 17, 2019

Northern States Power Company



401 Nicollet Mall
Minneapolis, MN 55401-1993

Month Day, 2019

(Via email only to:
representative@company.com)

Representative
Company
Street Address, Office Location
City, State Zip Code

Re: Unsolicited Project Inquiry

Dear Representative:

Please allow this letter to serve as an initial response to the (project inquiry/unsolicited offer of generation), addressing your questions on the process for unsolicited requests for distributed generation (DG) power purchase agreements (PPAs) in Minnesota. To help create clarity, the details in this letter go beyond some of your specific questions.

You have inquired about the process for entering into a Power Purchase Agreement (PPA) under our Section 10 tariff in Minnesota for distributed generation with a nameplate capacity above 1 MW. The Section 10 Tariff addresses distributed generation interconnection and is limited to projects of 10 MW or less. The Section 10 tariff, Sheet 73, states in pertinent part:

AVAILABILITY

Available to retail electric customers at distribution voltages and who operate a qualifying distributed generating (DG) facility, as defined below, with nameplate rating of 10,000 kW or less, which is operated in parallel with Company's distribution system.

That being said, if a DG project is larger than that allowed under our Section 10 interconnection tariff, we can still allow interconnection if engineering and other requirements are met. Please note that any eventual interconnection agreement for a project larger than 10 MW would require approval from the Minnesota Public Utilities Commission ("Commission"). An interconnection agreement would only allow interconnection and would not address compensation.

Regarding compensation, a developer must demonstrate that it has established itself as a Qualifying Facility (QF) either through making appropriate filings with the FERC, or where

applicable having a self-certification under the FERC process. This is consistent with Minn. R. 7835.4019 that requires negotiation of a contract to set the applicable avoided cost rates for qualifying facilities (QFs) of 1 MW or more.

7835.4019

QUALIFYING FACILITIES OF 1,000 KILOWATT CAPACITY OR MORE.

A qualifying facility with capacity of 1,000 kilowatt capacity or more must negotiate a contract with the public utility to set the applicable rates for payments to the customer of avoided capacity and energy costs. Nothing in parts 7835.4010 to 7835.4015 prevents a utility from connecting qualifying facilities of greater than 1,000 kilowatt capacity under its avoided cost rates.

A key factor in determining the avoided cost to be applied to a specific QF is the date that the QF established a legally enforceable obligation (LEO). The Commission has addressed some of the factors it considers in determining whether a QF project has progressed sufficiently to indicate project viability for purposes of establishing a LEO under PURPA. In *In the Matter of the Petition by Highwater Wind LLC and Gadwall Wind LLC for Resolution of a Cogeneration and Small Power Production Dispute with Minnesota Power under Minn. Stat. § 216B.164, Subd. 5*, Docket No. E015/CG-11-1073, (the *Highwater* case) the Commission's February 25, 2013 order identified several factors showing that the developer was not ready, willing, and able to make meaningful commitments to enter into a PPA because of critical obstacles to viability. These factors included the following:

1. *Performance guarantees.* Lack of performance guarantees were in place to require the project developer to pay a penalty if the project fails to progress according to schedule.
2. *Financing.* The record provided no evidence that financing had been finalized.
3. *Major parts supply.* The record provided no evidence that the developer had secured commitments for the major components (in that case for the turbines).
4. *Easements.* The record did not clearly show that the landowners would sell easements, let alone under terms and on a schedule that would make the project viable.
5. *Site permits.* No site permits had been filed, and this indicated that the project remained in its initial stage.
6. *Interconnection plans.* Progress on interconnection needs to demonstrate that the developer is ready, willing, and able to meet the obligations of a PPA.

The established LEO requirements aid in evaluating the viability of a proposal. In conjunction with the above, the minimum information necessary for the evaluation of an unsolicited proposal would include: generator location, size and type; fuel type; forecasted

energy and capacity production and frequency/timing of the energy delivery; generation interconnection type, location, and status; desired rate and terms for compensation; expected commercial operation date; and status of QF self-certification.

Once a LEO is established, this information can be used to evaluate the value of the proposed project and either accept it or make a counter-offer. The avoided cost pricing for a renewable energy source would then be based on Minn. Stat. § 216B.164, that provides in pertinent part:

Subd. 4. Purchases; wheeling; costs. (a) ... this subdivision shall apply to all qualifying facilities having ... 1,000-kilowatt capacity or more if interconnected to a public utility, which elect to be governed by its provisions.

(b) The utility to which the qualifying facility is interconnected shall purchase all energy and capacity made available by the qualifying facility. The qualifying facility shall be paid the utility's full avoided capacity and energy costs as negotiated by the parties, as set by the commission, or as determined through competitive bidding approved by the commission. The full avoided capacity and energy costs to be paid a qualifying facility that generates electric power by means of a renewable energy source are the utility's least cost renewable energy facility or the bid of a competing supplier of a least cost renewable energy facility, whichever is lower

The Company provides some guidance to help set expectations. As a general matter, we believe that the avoided cost for renewable energy on our system would not be higher than recent RFP pricing for renewable projects. This is based on the statute and also because our avoided cost calculated for purposes of entering into a new renewable PPA should not be higher than the actual bid cost for entering into a renewable PPA. NSP issued a wind energy RFP in 2016, and more than 30 responses were below \$22/MWh on a Levelized Cost of Energy basis. Accordingly, once a LEO has been established, and compliance with size limits are met, the developer of a renewable QF project should expect pricing below the \$22/MWh level. More specific cost detail can be provided once a LEO has been established and other relevant information has been provided.

The above discussion focuses on PPAs above 1 MW. The Company notes that FERC has been authorized by statute to terminate a utility's duty to enter into new purchase obligations under PURPA and may terminate the utility's purchase obligation where it finds that the QFs in the utility's service territory have nondiscriminatory access to sell electricity into a viable wholesale electricity market. (16 U.S.C. § 824a-3(m)). FERC has established by rule a rebuttable presumption that a QF having capacity exceeding 20 MW within MISO's service territory has non-discriminatory access to the wholesale electric markets. (18 C.F.R. § 292.309(e)). Consistent with this, FERC has issued an order terminating the duty of Northern States Power Company, as of May 12, 2011, to form new LEOs with QFs having a net capacity greater than 20 MW. (*Northern States Power Company, a Minnesota corporation,*

Docket No. QM11-3-000, Order Granting Application to Terminate Purchase Obligation, 136 FERC ¶ 61,093 (2011)).

Hopefully the above discussion is helpful to you in understanding the PPA process in Minnesota and in setting expectations.

Sincerely,

First Last Name

Xcel Energy

Director, Resource Planning

Office: 612-XXX-XXXX

director.of.resource.planning@xcelenergy.com

CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

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

Dated this 17th day of June 2019

/s/

Lynnette Sweet
Regulatory Administrator

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Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kathleen M.	Brennan	kmb@mcgrannshea.com	McGrann Shea Carnival, Straughn & Lamb, Chartered	800 Nicollet Mall Ste 2600 Minneapolis, MN 554027035	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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Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Pat	Carruth	pat@mnvalleyrec.com	Minnesota Valley Coop. Light & Power Assn.	501 S 1st St. PO Box 248 Montevideo, MN 56265	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kenneth A.	Colburn	kcolburn@symbioticstrategi es.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-521_Official Service List PUC
Curtis	Cordt	ccordt@mvec.net	Minnesota Valley Electric Cooperative	125 Minnesota Valley Electric Drive Jordan, MN 55352	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	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
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Solar	14333 Orchard Rd. Minnetonka, MN 55345	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Art	Crowell	acrowell@sundialsolarener gy.com	Sundial Solar	not provided ,	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Patrick	Dalton	patrick.l.dalton@xcelenergy .com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
James	Darabi	james.darabi@solarfarm.co m	Solar Farm, LLC	2355 Fairview Ave #101 St. Paul, MN 55113	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
James	Denniston	james.r.denniston@xcelen ergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Cheryl	Dietrich	cheryl.dietrich@nexteraene rgy.com	NextEra Energy Resources, LLC	700 Universe Blvd E1W/JB Juno Beach, FL 33408	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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Robin	Doege	Rdoege@stearnsselectric.org	Stearns Electric Association	PO Box 40 Melrose, MN 56352-0040	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kristin	Dolan	kdolan@meeker.coop	Meeker Cooperative Light & Power Assn	1725 US Hwy 12 E. Ste 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	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
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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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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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Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	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
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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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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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Mike	Pontius	mpontius@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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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
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