

January 22, 2023

Via Electronic Filing

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
Saint Paul, MN 55101-2147

Re: *In the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of its Community Solar Garden Program, Docket No. 13-867*

Joint Reply Comments of NextEra Energy Resources, LLC and United States Solar Corporation on Changing ARR-era CSGs from ARR to VOS

Dear Mr. Seuffert:

Pursuant to the Minnesota Public Utilities Commission's ("Commission") October 9, 2023 Notice of Comment Period ("Notice"),¹ NextEra Energy Resources, LLC ("NextEra") and United States Solar Corporation ("US Solar") respectfully submit these Joint Reply Comments in response to certain items raised in various initial comments submitted on or before January 8, 2024, regarding the proposal of Northern States Power Company, doing business as Xcel Energy ("Xcel"), to change ARR-era Community Solar Gardens ("CSGs") from the Applicable Retail Rate ("ARR") to the Value of Solar rate ("VOS") (the "Proposal").²

As a preliminary matter, the *hundreds* of initial comments filed by diverse stakeholders share broad consensus on two important points. First, all stakeholders pointed to the Commission order approving Xcel's CSG program in 2014 (the "Approval Order"),³ whose plain language clearly directs that "solar-garden projects approved under the [ARR] should be credited at the [ARR] in place at the time of energy generation *for the duration of the 25-year contract*."⁴ The universal

¹ eDockets Doc. ID No. [202310-199443-01](#). See also eDockets Doc. ID Nos. [202311-200182-01](#); [202311-200324-01](#); [202311-200806-01](#) (comment period extensions).

² See Proposal for Switching ARR-era Community Solar Gardens to Appropriate VOS Rate, September 25, 2023, eDockets Doc. ID No. [20239-199127-01](#).

³ Commission Order Approving Solar-Garden Plan with Modifications, September 17, 2014, eDockets Doc. ID No. [20149-103114-01](#).

⁴ *Id.* at 9 (emphasis added); see, e.g., Public Comment of the City of Minneapolis, eDockets Doc. ID. No. [20241-201995-01](#), at 2–3; Public Comment of the University of Minnesota, eDockets Doc. ID. No. [20241-201993-01](#), at 1; Public Comment Batch 2 01052024, eDockets Doc. ID No. [20241-201907-01](#) (30 of the hundreds of comments noting subscribers joined the program "with the understanding that these rates were locked in for the full terms of their 25-year contract").

understanding and expectation was and has been that the ARR would apply for the full 25-year term of the CSG program’s producer agreement. Second, the Approval Order’s establishment of this critical contract term was reasonable and necessary to provide the certainty required by developers, financiers, and subscribers to participate in the new CSG program.⁵ As explained further below, the few proposals raised in initial comments that discount these consensus points⁶ should be rejected.

First, although NextEra and US Solar appreciate the Office of the Attorney General—Residential Utilities Division’s (“OAG–RUD”) comments on behalf of Xcel’s residential and small commercial Minnesota customers, its recommendations are neither practically warranted nor legally permissible—the Proposal should be rejected outright.⁷ As described in NextEra’s and U.S. Solar’s Joint Initial Comments (“Joint Initial Comments”), contracts between CSGs and subscribers were marketed in reliance on—and reflect the unanimously–accepted and reasonable understanding of—the Approval Order, which unambiguously directed that the ARR apply for the duration of the 25-year contracts between CSG operators and Xcel.⁸ Indeed, each CSG operator is contractually obligated to provide its subscribers a copy of the Standard Contract for Solar*Rewards Community (the “Standard CSG Contract”),⁹ which clearly fixes the credit rate at the ARR for its 25-year term and clarifies subscribers’ role as third-party beneficiaries.¹⁰ Subscribers thus correctly understood they were entitled to the ARR for the duration of their subscription terms, an understanding shared across customer classes, not just by residential and small commercial subscribers.¹¹ That the Proposal would require a departure from a clear Commission directive is no basis to retroactively call into question the transparency and marketing efforts of CSG developers, much less to permit subscribers to cancel or otherwise modify their third-party subscription contracts as a justification for approving the Proposal.¹² As explained in the Joint Initial Comments, doing so would not be in the public interest nor does the Commission possess authority to require cancellation or modification of subscription contracts.¹³

⁵ See, e.g., Public Comment of the Department of Commerce, eDockets Doc. ID No. [20241-201996-02](#), at 8; Public Comment Solar Energy Advocates, eDockets Doc. ID No. [20241-201961-01](#), at PDF page 9.

⁶ Notably, the few comments in support of approving the Proposal do not dispute these consensus points, urging approval seemingly in spite of them. See Public Comment of Fresh Energy, eDockets Doc. ID No. [20241-201980-01](#), at 9; Public Comment of OAG RUD, eDockets Doc. ID No. [20241-201968-02](#), at 14–16 (“The public comments filed in the docket suggest that most subscribers believed that they were signing an agreement that locked in the applicable retail rate for a 25-year term—and that they are only now learning that the benefit they thought they were getting may be illusory.”).

⁷ Public Comment of OAG RUD, eDockets Doc. ID No. [20241-201968-02](#).

⁸ Joint Initial Public Comment of NextEra and US Solar, eDockets Doc. ID. No. [20241-201988-01](#), at 2–5.

⁹ Section 6.S of the Standard CSG Contract provides: “Fair Disclosure. Prior to the time when any person or entity becomes a Subscriber, the Community Solar Garden Operator will fairly disclose the future costs and benefits of the Subscription, and provide to the potential Subscriber a copy of this Contract.” Xcel Rate Book, Section No. 9, Sheet No. 79 (emphasis added).

¹⁰ *Id.* at Definitions, Sheet No. 69 (ARR mandate), Section 11.C, Sheet No. 83 (third-party beneficiaries).

¹¹ Sophisticated large commercial subscribers (most if not all of whom were represented by counsel in negotiation of the subscription contracts) formulated long term budgets based on 25-year savings from the ARR. See, e.g., Public Comment from Metropolitan Council, eDockets Doc. ID No. [20241-201937-01](#), at 1.

¹² Public Comment of OAG RUD, eDockets Doc. ID No. [20241-201968-02](#), at 21.

¹³ Joint Initial Public Comment of NextEra and US Solar, eDockets Doc. ID. No. [20241-201988-01](#), at 6–8.

Second, the few comments submitted in support of the Proposal (in whole or in part) rely on variations on a single theme—ensuring a fair allocation of CSG program costs to protect nonsubscriber customers.¹⁴ NextEra and US Solar agree that equitable distribution of costs is a key consideration, but such an evaluation supports the denial of the Proposal, not approval. The CSG program was designed and approved from its inception to recover its costs in the way that is now criticized by these commenters. As discussed in the Joint Initial Comments, stakeholders and the Commission understood and intended that the ARR was linked to Xcel’s retail rates and therefore anticipated that the ARR would increase over time to the extent that Xcel’s retail rates increased.¹⁵ Further, rather than reducing the net cost burden on Xcel’s Minnesota customers, the Proposal merely redistributes those costs (in the form of reduced bill credits) to CSG subscriber customers—particularly onto “those subscribers whose participation in community solar the Legislature has sought to incent.”¹⁶ As the Minnesota Department of Commerce explained in its initial comments, “public interest subscribers” including “[g]overnments, public school districts, hospitals and clinics, churches, private schools, and residential subscribers comprise a supermajority—70 percent of subscribed capacity and 72 percent of the bill credit—of the subscribed capacity to the ARR-era gardens.”¹⁷ Reneging on a commitment to those early adopters based on the ARR rising as expected is not in the public interest. It would run counter to the legislature’s recent directive for the CSG program to focus even more on serving this exact type of public-interest subscriber, and almost certainly chill the interest and participation by developers, investors, and subscribers needed to help Minnesota achieve its energy equity and decarbonization goals.

Third, a few commenters highlight that several states have recently adjusted their net-metering programs to account for cost inequities and incentivize participation from low-income households, persons of color, and other low-representation participants as a basis to adopt the Proposal.¹⁸ However, those specific changes apply to rooftop solar programs¹⁹ and, to the extent they are informative for Minnesota’s CSG program, they support denying the Proposal. Indeed, most of the other states’ decisions to reduce their net-metering rate expressly affirm a commitment to prior orders and approved credit amounts and were implemented via successor tariffs for new net-metering customers only—none has the effect of retroactively invalidating approved and executed

¹⁴ See Public Comment of Fresh Energy, eDockets Doc. ID No. [20241-201980-01](#); Public Comment of Senators Frentz, Mitchell, Klein, Xion, and Hoffman, eDockets Doc. ID. No. [20241-202022-01](#).

¹⁵ Joint Initial Public Comment of NextEra and US Solar, eDockets Doc. ID. No. [20241-201988-01](#), at 8. Moreover, stakeholders understood the ARR could and would decrease if Xcel’s retail rates decreased, and—in fact—the ARR has decreased in real dollar terms since its approval, contrary to VOS, which increases annually alongside general consumer price index inflation. *Id.*

¹⁶ Public Comment of the Department of Commerce, eDockets Doc. ID No. [20241-201996-02](#), at 10.

¹⁷ *Id.*

¹⁸ See Public Comment of Senators Frentz, Mitchell, Klein, Xion, and Hoffman, eDockets Doc. ID. No. [20241-202022-01](#), at 2.

¹⁹ See California PUC Order Instituting Rulemaking to Revisit Net Energy Metering Tariffs, Cal. PUC Decision No. [22-12-056](#) (Dec. 15, 2022) (recounting history of net-metering for rooftop solar generation involving tariffed reimbursement rate and concluding “[i]t is premature to adopt a Community Solar tariff or subtariff in this decision”), at 5–9, 229; Hawaii PUC Order No. 33258 Instituting a Proceeding to Investigate Distributed Energy Resource Policies, Docket No. 2014-0192 (Oct. 12, 2015) ([available here](#)) (capping the utility in question’s rooftop solar net-metering program and explicitly distinguishing Hawaii’s “Community-Based Renewable Energy” programs from applicability of this order), at 2, 141 n.307; Arizona Corporation Commission Docket E-01345A-23-0110, [Sept. 11, 2023 Order](#) (approving of reduction in utility’s revised rider resource comparison proxy rate for “a rooftop solar system”).

utility contracts, as the Proposal would have the Commission do here.²⁰ Importantly, Minnesota already moved away from 1:1 net-metering rates for new CSGs seven years ago by implementing VOS for post-2016 CSGs,²¹ a move consistent with other states' evolution on net metering around that same time.²² However, that transition does not justify retroactively altering contracted credit rates, and no commenter demonstrated that other states have taken such drastic and punitive actions against early adopter CSG participants.

For the foregoing reasons, as well as those explained in their Joint Initial Comments, NextEra and US Solar respectfully request the Commission deny Xcel's proposal to change ARR-era CSGs from the ARR to VOS. NextEra and US Solar appreciate the Commission's attention to these comments and look forward to answering any questions that it may have.

Respectfully submitted,

Stinson LLP

/s/ Micah J. Revell

Micah J. Revell

²⁰ See California PUC Order Instituting Rulemaking to Revisit Net Energy Metering Tariffs, Cal. PUC Decision No. [22-12-056](#) (Dec. 15, 2022) (concluding that “the NEM 1.0 and NEM 2.0 tariff should remain intact” to avoid “result[ing] in an inequity to . . . NEM 1.0 and NEM 2.0 participant ratepayers,” among potential others), at 193; Hawaii PUC Order No. 33258 Instituting a Proceeding to Investigate Distributed Energy Resource Policies, Docket No. 2014-0192 (Oct. 12, 2015) ([available here](#)) (capping the utility in question's “net metering program . . . to ensure a smooth transition to a re-designed, market-based structure for distributed resources” but noting “[n]othing about the NEM program will change for existing NEM customers or customers who have already applied and are waiting for approval”), at 2; Arizona Corporation Commission Docket E-01345A-23-0110, [Sept. 11, 2023 Order](#) (relating to approval of reduction in Arizona Public Service Company's revised rider resource comparison proxy rate that “appl[ies] to residential customers who submit an interconnection application for a rooftop solar system on or after the effective date of the new RCP rate” and noting that the 2023 “tranche of customers will retain this RCP rate for a period of 10 years”).

²¹ Commission Order Approving Value-of-Solar Rate for Xcel's Solar-Garden Program, September 6, 2016, eDockets Doc. ID No. [20169-124627-01](#), at 23.

²² See, e.g., New York Pub. Serv. Comm'n., [Case No. 15-E-0751](#), Doc. ID No. 1472, Order on Net Energy Metering Transition, Phase One of Value of Distributed Energy Resources, and Related Matters In the Matter of the Value of Distributed Energy Res. (Mar. 9, 2017), at 15–17 (“establishing . . . the Value Stack tariff implementing a new, more comprehensive DER program based on monetary crediting for net hourly injections” and, similar to the Approval Order, explaining that “Projects eligible for the Value Stack tariff will receive compensation for a term of 25-years from their in-service date”).

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

*In the Matter of the Petition of Northern
States Power Company, dba Xcel Energy, for
Approval of its Community Solar Garden
Program*

)
)
)
)
)

Docket No. 13-867

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 22, 2024, a true and correct copy of **NextEra Energy Resources, LLC and United States Solar Corporation’s Joint Reply Comments** was electronically filed with the Minnesota Public Utilities Commission through its eDockets system and simultaneously served electronically on the individuals attached hereto.

Dated this 22nd day of January, 2024.

s/ Marci A. Pikula
Marci A. Pikula

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	ross.abbey@us-solar.com	United States Solar Corp.	100 North 6th St Ste 222C Minneapolis, MN 55403	Electronic Service	No	OFF_SL_13-867_Official
Daniel	Abelson	daniel.abelson@metc.state.mn.us	Metropolitan Council	390 Robert Street N. St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-867_Official
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, MN 55405	Electronic Service	No	OFF_SL_13-867_Official
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St Denver, CO 80204-8020	Electronic Service	No	OFF_SL_13-867_Official
Andrew	Ball	aball@keyesfox.com	Keyes & Fox LLP	1580 Lincoln Street Suite 880 Denver, CO 80203	Electronic Service	No	OFF_SL_13-867_Official
Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_13-867_Official
Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC	855 Village Center Drive #256 North Oaks, MN 55127	Electronic Service	No	OFF_SL_13-867_Official
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-867_Official
Gabriel	Chan	gabechan@umn.edu	University of Minnesota	130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, MN 55455	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
City	Clerk	gregg.engdahl@ci.stcloud.mn.us	City of St. Cloud	400 Second St. S St. Cloud, MN 56301	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
Kevin	Cray	kevin@communitysolaraccess.org	CCSA	1644 Platte St Denver, CO 80202	Electronic Service	No	OFF_SL_13-867_Official
George	Damian	gdamian@cleanenergyeconomy.mn.org	Clean Energy Economy MN	13713 Washburn Ave S Burnsville, MN 55337	Electronic Service	No	OFF_SL_13-867_Official
Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures	3500 Bloomington Ave. S Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_13-867_Official
Scott F	Dunbar	sdunbar@keyesfox.com	Keyes & Fox LLP	1580 Lincoln St Ste 880 Denver, CO 80203	Electronic Service	No	OFF_SL_13-867_Official
Hannah	Dunn	hannah.dunn@oakdalemn.gov	City of Oakdale	1584 Hadley Ave N Oakdale, MN 55104	Electronic Service	No	OFF_SL_13-867_Official
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dick	Edwards	dedwards@ci.maple-grove.mn.us	City of Maple Grove	12800 Arbor Lakes Parkway P O Box 1180 Maple Grove, MN 553116180	Electronic Service	No	OFF_SL_13-867_Official
Betsy	Engelking	betsy@nationalgridrenewables.com	National Grid Renewables	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_13-867_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_13-867_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_13-867_Official
Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_13-867_Official
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_13-867_Official
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_13-867_Official
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_13-867_Official
Sean	Gosiewski	sean@afors.org	Alliance for Sustainability	2801 21st Ave S Ste 100 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Greenbert	scott@nautilusolar.com	Nautilus Solar Energy, LLC	396 Springfield Ave, Ste 2 Summit, NJ 07901	Electronic Service	No	OFF_SL_13-867_Official
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_13-867_Official
Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments	8100 Boone Blvd Suite 430 Vienna, VA 22182	Electronic Service	No	OFF_SL_13-867_Official
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_13-867_Official
Julie	Jorgensen	juliejorgensen62@gmail.com	Greenmark Solar	4630 Quebec Ave N New Hope, MN 55428-4973	Electronic Service	No	OFF_SL_13-867_Official
Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC	4710 Blaylock Way Inver Grove Heights, MN 55076	Electronic Service	No	OFF_SL_13-867_Official
Ralph	Kaehler	Ralph.Kaehler@gmail.com		13700 Co. Rd. 9 Eyota, MN 55934	Electronic Service	No	OFF_SL_13-867_Official
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, MN 55118	Electronic Service	No	OFF_SL_13-867_Official
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors	3140 43rd Ave S Minneapolis, MN 55406	Electronic Service	No	OFF_SL_13-867_Official
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_13-867_Official
Aaron	Knoll	aknoll@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200 Wayzata, MN 55391	Electronic Service	No	OFF_SL_13-867_Official
Annie	Levenson Falk	annief@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-867_Official
Alice	Madden	alice@communitypowermn.org	Community Power	2720 E 22nd St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_13-867_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_13-867_Official
Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota	4808 10th Avenue S Minneapolis, MN 55417	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jason	Maur	jason.maur@renesolapower.com	Renosola Power Holdings, LLC	850 Canal Street 3rd Floor Stamford, CT 06902	Electronic Service	No	OFF_SL_13-867_Official
Matthew	Melewski	matthew@nokomisenergy.com	Nokomis Energy LLC & Ole Solar LLC	2639 Nicollet Ave Ste 200 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, MN 55120	Electronic Service	No	OFF_SL_13-867_Official
Michael	Menzel	mike.m@sagiliti.com	Sagiliti	23505 Smithtown Rd. Suite 280 Excelsior, MN 55331	Electronic Service	No	OFF_SL_13-867_Official
Brian	Millberg	fwengineering@comcast.net		695 Grand Ave #222 Saint Paul, MN 55105	Electronic Service	No	OFF_SL_13-867_Official
Marc	Miller	mmiller@soltage.com	Soltage, LLC	66 York Street, 5th Floor Jersey City, NJ 07302	Electronic Service	No	OFF_SL_13-867_Official
Marcus	Mills	Marcus@communitypowermn.org	Community Power	2720 E 22nd St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_13-867_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Pouya	Najmaie	pouya@cooperativeenergyfutures.com	Cooperative Energy Futures	3416 16th Ave S Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
Darin	Nelson	dnelson@minnetonkamn.gov	City of Minnetonka	14600 Minnetonka Blvd Minnetonka, MN 55345	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_13-867_Official
Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association	2288 University Ave W St. Paul, MN 55114	Electronic Service	No	OFF_SL_13-867_Official
Patty	O'Keefe	patty.okeefe@sierraclub.org		2525 Emerson Ave S Apt 2 Minneapolis, MN 55405	Electronic Service	No	OFF_SL_13-867_Official
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_13-867_Official
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_13-867_Official
Eric	Pasi	ericp@ips-solar.com	IPS Solar	2670 Patton Rd Roseville, MN 55113	Electronic Service	No	OFF_SL_13-867_Official
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_13-867_Official
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_13-867_Official
Morgan	Pitz	morgan.pitz@us-solar.com	US Solar	100 N 6th St #410B Minneapolis, MN 55403	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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Paula	Prahl	paula.prahl@dominiuminc.com	Dominium	2905 Northwest Blvd Ste 150 Plymouth, MN 55441	Electronic Service	No	OFF_SL_13-867_Official
Bridget	Rathsack	bridget.rathsack@burnsvill emn.gov	City of Burnsville, MN	100 Civic Center Parkway Burnsville, MN 55337	Electronic Service	No	OFF_SL_13-867_Official
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_13-867_Official
Micah	Revell	micah.revell@stinson.com	Stinson LLP	50 South Sixth St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_13-867_Official
Jonathan	Roberts	jroberts@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@xcele nergy.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 PI E Ste 350 Saint 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
David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions	2303 Wycliff St Ste 300 St. Paul, MN 55114	Electronic Service	No	OFF_SL_13-867_Official
Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC	233 Park Ave S Ste 201 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
Karl	Sonneman	karl17@hbci.com	Law Office of Karl W. Sonneman	111 Riverfront Suite 202 Winona, MN 55987	Electronic Service	No	OFF_SL_13-867_Official
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_13-867_Official
Ally	Sutherland	asutherland@ighmn.gov	City of Inver Grove Heights	8150 Barbara Avenue Inver Grove Heights, MN 55077	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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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	Nik@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
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_13-867_Official
Jessica	Welk	jwelk@sherman- associates.com	Sherman Associates	233 Park Avenue South Suite 201 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_13-867_Official
Curtis P	Zaun	curtis@cpzlaw.com	Attorney At Law	3254 Rice Street Little Canada, MN 55126	Electronic Service	No	OFF_SL_13-867_Official