



85 7TH PLACE EAST, SUITE 280
SAINT PAUL, MINNESOTA 55101-2198
MN.GOV/COMMERCE
651.539.1600 FAX: 651.539.1574
AN EQUAL OPPORTUNITY EMPLOYER

May 19, 2017

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Supplemental Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-16-777

Dear Mr. Wolf:

Attached are the supplemental comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Petition of Xcel Energy for Approval of the Acquisition of Wind Generation from the Company's 2016-2030 Integrated Resource Plan.

The request for proposals (RFP) was filed on September 22, 2016, the petition for utility-owned generation was filed on October 24, 2016 and the selection of projects from the RFP was filed on March 15, 2017 by:

Aakash Chandarana
Regional Vice President
Northern States Power Company
414 Nicollet Mall
Minneapolis, MN 55401

The Department provides its supplemental comments to respond to issues raised by other parties in reply comments. The Department continues to recommend that the Minnesota Public Utilities Commission (Commission) **approve the petition with modifications**. The Department's team of Sue Peirce, Mark Johnson and myself are available to answer any questions the Commission may have.

Sincerely,

/s/ STEVE RAKOW
Analyst Coordinator

SR/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

SUPPLEMENTAL COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET NO. E002/M-16-777

I. INTRODUCTION

On September 22, 2016, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed a letter informing the Minnesota Public Utilities Commission (Commission) that the Company issued a request for proposals (RFP) for wind resources that would achieve commercial operation prior to December 31, 2020 in order to qualify for 100 percent of the current production tax credit (PTC). RFP bids were to be submitted to Xcel by October 25, 2016.

On October 24, 2016, Xcel filed the Company's *Petition for Approval of the Acquisition of Wind Generation from the Company's 2016-2030 Integrated Resource Plan* (Petition). The Petition requested approval for the Company to build, own, and operate a 750 MW portfolio consisting of four separate self-build wind projects. The Petition also indicated that Xcel would supplement the Petition in the first quarter of 2017, after the Company evaluated bids received in response to the pending RFP.

On November 4, 2016, the Commission issued a notice indicating that no comment period was being established on the Petition.

On November 17, 2016, the Company provided a corrected Attachment C to the Petition.

On January 4, 2017, Xcel filed a progress report regarding the RFP.

On March 14, 2017, Xcel filed the Company's *Application for Consideration of a Resource Treatment Framework to Address Jurisdictional Cost Allocation Issues*, a petition originally filed December 31, 2016 in Docket No. E002/M-16-223.

On March 15, 2017, Xcel filed the Company's *Supplement: Wind Generation Acquisition* (Supplement).

On March 20, 2017, the Commission issued its *Notice of Comment Period on Petition* on various issues concerning Xcel's total proposed portfolio of 1,550 MW of wind, providing the due dates of May 1, 2017 for comments and May 15, 2017 for reply comments.

On April 3, 2017, Xcel filed a letter (April 3 Letter) regarding the application of Minnesota Statutes § 216B.50 and Minnesota Rule 7825.1800 to the Petition and the Supplement.

On April 7, 2017, the Commission issued a *Revised Notice of Comment Period on Petition* (Notice), maintaining the due dates for comments but expanding the topics open for comment.

On May 1, 2017, comments were filed by the following parties:

- Clean Energy Organizations;¹
- Department;
- Geronimo Energy;
- Laborers District Council of Minnesota and North Dakota;
- Minnesota Chamber of Commerce (Chamber); and
- Office of Attorney General—Residential Utilities and Antitrust Division (OAG).

On May 15, 2017, reply comments were filed by the following parties:

- Department;
- OAG; and
- Xcel.

Below are the Department's supplemental comments. The Department indicated in the May 15 comments that we would supplement our response with the completed analysis of Xcel's proposal to use the requested resources to comply with the Minnesota Renewable Energy Standard (RES). In addition, we address the application of Minnesota Statute §216B.50 and curtailment matters.

II. REPLY TO XCEL

A. RENEWABLE ENERGY STANDARDS ANALYSIS

Xcel requested that the Commission "confirm that the 1,550 MW proposed wind portfolio is a reasonable and prudent way to continue to meet the obligations under Minnesota's Renewable Energy Standard (RES)" under Minnesota Statutes §216B.1691. The Department's May 1, 2017 comments stated "at this time the Department has requested further information regarding the Company's response to Commission Information Request No. 6 and will provide a complete RES analysis in reply comments."

The Department reviewed the information provided by Xcel in response to DOC IR Nos. 16 and 17, and concludes overall that their analysis is reasonable. The Company appropriately allocated its renewable energy credits (RECs) among its various jurisdictions. The forecast

¹ The Clean Energy Organizations are Fresh Energy, Minnesota Center for Environmental Advocacy, Sierra Club, and Wind on the Wires.

of energy requirements initially used by the Department to assess whether the projects were needed for Xcel to comply with the RES was higher than that used by the Company. However, the Department's forecast appears to have included line losses, which overstated the amount of renewable power that would be needed for the RES. Thus, the Department concludes that Xcel's forecast of renewable energy that would actually need to be produced for Xcel's system is reasonable.

Xcel undertook an analysis assuming the 24 percent wind requirement starting in 2020, as well as an overall RES compliance calculation without the 24 percent wind requirement. Without the proposed projects, Xcel has sufficient wind resources to comply with the 24 percent wind requirement through 2026, and without the 24 percent wind requirement to meet the RES through 2027. With the proposed projects, Xcel would have enough renewable power to comply with the RES through 2044.

The Department concludes that Xcel will need the additional wind resources provided by the RFP by the mid-2020's.

Technically, Xcel would exceed, in some years, the amount of renewable energy needed to comply with the RES. However, because the wind projects are highly cost effective, and it is unknown whether that will be the case in the future, the Department concludes that Xcel's proposal to use the projects to comply with the RES is reasonable.

B. APPLICATION OF MINNESOTA STATUTES §216B.50

The Department's May 1, 2017 comments recommended that "in reply comments, Xcel discuss the need for a variance regarding reporting the information outlined under Minnesota Rules 7825.1400 (A) to (J) or provide the required information."² In response, the Company requested a variance in this case pursuant to Minn. R. 7829.3200 from providing the information required by Minnesota Rules 7825.1400 (A) to (J) for the Blazing Star I, Blazing Star II, Foxtail, Freeborn, and Crowned Ridge projects (in addition to the Lake Benton Project). Xcel stated that the Company does not intend to issue, sell, or transfer any stock in connection with these projects; thus these components of the rules regarding capital structure are not relevant to this docket. Moreover, Xcel stated that requiring this information would impose an excessive burden and that granting the variance would be in the public interest since the proposed projects are in the public interest. The Department agrees with Xcel's requested variance and recommends that the Commission approve Xcel's requested variance from providing the information required by Minnesota Rules 7825.1400 (A) to (J).

C. CURTAILMENT COMPENSATION

The Department's May 1, 2017 comments recommended that Xcel clarify "the difference in the following provisions in the contracts regarding (non-) compensation for curtailments:

² This information is identified as necessary under Minnesota Rule 7825.1800, Filing Requirements for Petitions to Acquire Property, subdivision B. Xcel did provide the purchase prices, terms of payment and other considerations required under this subdivision.

- combination of Provisions 8.3 A and 8.3 B.1(a) and
- Provision 8.3 B.2.”

The Company clarified the three Provisions as follows. First, “section 8.3(A) of the PPAs gives the Company, or Transmission Authority, the right to curtail the delivery of renewable energy from the facility for any reason and in their sole discretion regardless of whether or not such a curtailment would be considered compensable or non-compensable.”

Second, “The intent of the language in section 8.3(B)(1)(a) is to specify that if the Company or Transmission Authority curtails deliveries of renewable energy for any reason that would not constitute a Non-Compensable Curtailment, as defined in Section 8.3(B)(2) of the PPAs, such a curtailment would be compensable.”

Third, Xcel clarified that:

Section 8.3(B)(2) of the PPAs further provides that any curtailment of deliveries of renewable energy, other than a compensable curtailment by the Company, would be considered non-compensable. This section of the PPAs also includes a non-exhaustive list of examples of Non-Compensable Curtailment.

Finally, the Department requested information regarding whether curtailments due to insufficient transmission outlet from MISO’s Zone 1 would be compensable or not. Xcel’s response was that “[since] outlet from MISO’s Zone 1 is beyond the point of delivery for both Clean Energy #1 and Crowned Ridge, such curtailments of renewable energy would be considered compensable unless the Transmission Authority were to declare an Emergency Condition or Force Majeure, or otherwise restrict or reduce the maximum permissible output in connection with the facility’s Interconnection Agreement(s).” This response illustrates the importance of having sufficient regional transmission projects in enabling economic dispatch of resources.³

The Department considers this information to have responded to the Department’s requests.

³ Since wind projects have a negative marginal cost while receiving the production tax credit, any curtailed wind energy will be replaced by higher cost resources in the dispatch order.

III. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission:

- approve the Lake Benton, Blazing Star I, Blazing Star II, Foxtail, Freeborn, and Crowned Ridge projects under § 216B.50;
- approve a variance from Minnesota Rules 7825.1800 (B)—the need to provide information required by Minnesota Rules 7825.1400 (A) to (J)—for the Lake Benton, Blazing Star I, Blazing Star II, Foxtail, Freeborn, and Crowned Ridge projects;
- order Xcel to provide projects of less than 12 MW, the threshold at which the Company's competitive bidding process applies, a reasonable period (perhaps 60 days) to provide proposals for re-powering existing facilities;⁴
- put Xcel on notice that:
 - the Commission will hold Xcel accountable for the prices and terms used to evaluate each of the selected projects for the purpose of cost recovery from Xcel ratepayers;
 - ratepayers will not be put at risk for any costs that are higher than bid or for assumed benefits that do not materialize;
 - ratepayers must be sufficiently protected from risks associated with the non-deliverability of accredited capacity and/or energy from the projects;
- order Xcel to report in its monthly fuel clause filings and annual automatic adjustment (AAA) filings the amount of any curtailment payments, along with explanations for the curtailments;
- require Xcel to account, clearly and separately, for all costs, including costs related to capital, operation and maintenance expense, and any other costs related to these facilities; and
- approve Xcel's proposed 1,550 MW of wind resource additions.

In addition to the Company's proposed January 2018 compliance filing, the Department recommends that the Commission require the Company to report, until the projects are in-service, project failures along with the options available to the Commission to remedy the failure.

Finally, the Department recommends that the Commission confirm that Xcel's proposed portfolio is a reasonable way to meet the Company's obligations under Minnesota's renewable energy standards.

⁴ In addition to the criteria applied in this proceeding Xcel should be required to use two additional criteria:

- That the repowered project has a lower overall LCOE than the existing PPA—supplemented by a generic replacement if necessary; and
- That the repowered project has an LCOE that is equal to or less than the highest LCOE approved by the Commission in this proceeding [Docket No. E002/M-16-777].

CERTIFICATE OF SERVICE

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, 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 Nos. **E002/M-16-777**

Dated this **19th** day of **May, 2017**.

/s/Linda Chavez

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_16-777_Official
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_16-777_Official
Jorge	Alonso	jorge.alonso@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-777_Official
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_16-777_Official
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_16-777_Official
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_16-777_Official
Joseph	Atkins	jeatkinslaw@aol.com	Rogosheske, Rogosheske & Atkins PLLC	105 Hardman Ct Ste 110 South St Paul, MN 55075	Electronic Service	No	OFF_SL_16-777_Official
Donna	Attanasio	dattanasio@law.gwu.edu	George Washington University	2000 H Street NW Washington, DC 20052	Electronic Service	No	OFF_SL_16-777_Official
Andrew	Bahn	Andrew.Bahn@state.mn.us	Public Utilities Commission	121 7th Place E., Suite 350 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-777_Official
Ryan	Barlow	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	150 South Fifth Street, Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-777_Official
Thomas R	Brause	tbrause@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_16-777_Official
B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP	Suite 1500 50 South Sixth Street Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_16-777_Official
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_16-777_Official
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_16-777_Official
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-777_Official
Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy	10 2nd St NE Ste. 400 Minneapolis, Minnesota 55413	Electronic Service	No	OFF_SL_16-777_Official
Jennifer	Christensen	jchristensen@gpsid.net	Great Plains Institute	2801 21st Ave S Suite 220 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_16-777_Official
Jeanne	Cochran	Jeanne.Cochran@state.mn.us	Office of Administrative Hearings	P.O. Box 64620 St. Paul, MN 55164-0620	Electronic Service	Yes	OFF_SL_16-777_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brad	Crabtree	bcrabtree@gpisd.net	Great Plains Institute	2801 21st Ave S Suite 220 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_16-777_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_16-777_Official
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_16-777_Official
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206 St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_16-777_Official
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-777_Official
Patricia	DeBleekere	tricia.debleeckere@state.mn.us	Public Utilities Commission	Suite 350 121 Seventh Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-777_Official
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_16-777_Official
Elizabeth	Dickinson	eadickinson@mindspring.com	Saint Paul Mayoral Candidate	384 Hall Saint Paul, MN 55107	Electronic Service	No	OFF_SL_16-777_Official
Ian	Dobson	Residential.Utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service 1400	Yes	OFF_SL_16-777_Official
Tim	Dolan	Tim.Dolan@co.sherburne.mn.us		13880 Business Center Dr NW Sherburne County Government Center Elk River, MN 55330-1692	Electronic Service	No	OFF_SL_16-777_Official
John	Doll	john@johndollsd40.org		10918 Southview Drive Burnsville, MN 55337	Paper Service	No	OFF_SL_16-777_Official
Randall	Doneen	randall.doneen@state.mn.us	Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul, MN 55155	Electronic Service	No	OFF_SL_16-777_Official
Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No	OFF_SL_16-777_Official
Tristan	Duncan	tlduncan@shb.com	Shook Hardy & Bacon, L.L.P.	2555 Grand Blvd. Kansas City, MO 64108	Electronic Service	No	OFF_SL_16-777_Official
Ed	Ehlinger	Ed.Ehlinger@state.mn.us	Minnesota Department of Health	P.O. Box 64975 St. Paul, MN 55164-0975	Electronic Service	No	OFF_SL_16-777_Official
Kristen	Eide Tollefson	N/A	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Paper Service	No	OFF_SL_16-777_Official
Bret	Eknes	bret.eknes@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_16-777_Official
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_16-777_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_16-777_Official
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-777_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_16-777_Official
Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International	5600 N Highway 169 Minneapolis, MN 55428-3096	Electronic Service	No	OFF_SL_16-777_Official
Stephen	Fogel	Stephen.E.Fogel@XcelEnergy.com	Xcel Energy Services, Inc.	816 Congress Ave, Suite 1650 Austin, TX 78701	Electronic Service	Yes	OFF_SL_16-777_Official
Dave	Frederickson	Dave.Frederickson@state.mn.us	MN Department of Agriculture	625 North Robert Street St. Paul, MN 551552538	Electronic Service	No	OFF_SL_16-777_Official
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Travis	Germundson	travis.germundson@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_16-777_Official
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	Yes	OFF_SL_16-777_Official
Julie	Goehring	N/A		708 70 Ave. NW Moorhead, MN 56560	Paper Service	No	OFF_SL_16-777_Official
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-777_Official
Bill	Grant	Bill.Grant@state.mn.us	Minnesota Department of Commerce	85 7th Place East, Suite 500 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-777_Official
Thomas J.	Grever	tgrever@shb.com	Shook, Hardy & Bacon L.L.P.	2555 Grand Blvd. Kansas City, MO 64108	Electronic Service	No	OFF_SL_16-777_Official
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-777_Official
Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-777_Official
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Hentges		City Of Mankato	P.O. Box 3368 Mankato, MN 560023368	Paper Service	No	OFF_SL_16-777_Official
John	Hole	jhole@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_16-777_Official
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_16-777_Official
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-777_Official
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-777_Official
Anne	Jackson	anne.jackson@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St Paul, MN 55115	Electronic Service	No	OFF_SL_16-777_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_16-777_Official
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_16-777_Official
Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities	145 University Ave. W. Saint Paul, MN 55103-2044	Electronic Service	No	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin D.	Johnson	kdjohnson@stoel.com	Stoel Rives LLP	Suite 4200 33 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-777_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-777_Official
Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-777_Official
Clark	Kaml	clark.kaml@state.mn.us	Public Utilities Commission	121 E 7th Place, Suite 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-777_Official
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_16-777_Official
Will	Kaul	wkaul@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_16-777_Official
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-777_Official
Jerome	Kleis	N/A		12060 Sherburne Ave Becker City Hall Becker, MN 55308-4694	Paper Service	No	OFF_SL_16-777_Official
Kate	Knuth	kate.knuth@gmail.com		2347 14th Terrace NW New Brighton, MN 55112	Electronic Service	No	OFF_SL_16-777_Official
Hank	Koegel	hank.koegel@edf-re.com	EDF Renewable Eenergy	10 2nd St NE Ste 400 Minneapolis, MN 55413-2652	Electronic Service	No	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_16-777_Official
Mara	Koeller	mara.n.koeller@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_16-777_Official
Frank	Kohlasch	frank.kohlasch@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N. St. Paul, MN 55155	Electronic Service	No	OFF_SL_16-777_Official
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-777_Official
Ganesh	Krishnan	ganesh.krishnan@state.mn.us	Public Utilities Commission	Suite 350121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-777_Official
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_16-777_Official
Rick	Lancaster	rlancaster@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_16-777_Official
Thomas	Landwehr	tom.landwehr@state.mn.us	Department of Natural Resources	Box 37, 500 Lafayette Rd St. Paul, Minnesota 55155	Electronic Service	No	OFF_SL_16-777_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_16-777_Official
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Chuck M	Legatt	chucklegatt@libertypaper.com	Liberty Paper Inc,	13500 Liberty Ln Becker, MN 55308-4623	Electronic Service	No	OFF_SL_16-777_Official
Mark S	Lindquist	mark.lindquist@state.mn.us	Natural Resources Dept	261 Highway 15 S DNR S Region HQ New Ulm, MN 56073-8915	Electronic Service	No	OFF_SL_16-777_Official
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_16-777_Official
Paula	Maccabee	Pmaccabee@justchangelaw.com	Just Change Law Offices	1961 Selby Ave Saint Paul, MN 55104	Electronic Service	No	OFF_SL_16-777_Official
Susan	Mackenzie	susan.mackenzie@state.mn.us	Public Utilities Commission	121 7th Place E Ste 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_16-777_Official
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_16-777_Official
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	Yes	OFF_SL_16-777_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_16-777_Official
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_16-777_Official
John	Marty	jmarty@senate.mn		75 Rev Dr Martin Luther King Jr Blvd Rm 323 Saint Paul, MN 55155	Electronic Service	No	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Matt	Massman	matt.massman@state.mn.us	Department of Administration	200 Administration Bldg. St. Paul, MN 55155	Electronic Service	No	OFF_SL_16-777_Official
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4 Canada	Electronic Service	No	OFF_SL_16-777_Official
Susan	Medhaug	Susan.medhaug@state.mn.us	Department of Commerce	Suite 280, 85 Seventh Place East St. Paul, MN 551012198	Electronic Service	Yes	OFF_SL_16-777_Official
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_16-777_Official
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-777_Official
Herbert	Minke	hminke@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_16-777_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_16-777_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-777_Official
Dorothy	Morrissey	dorothy.morrissey@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Debra	Moynihan	debra.moynihan@state.mn.us	MN Department of Transportation	395 John Ireland Blvd MS 620 St. Paul, MN 55155-1899	Electronic Service	No	OFF_SL_16-777_Official
Alan	Muller	alan@greendel.org	Energy & Environmental Consulting	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_16-777_Official
Brian	Napstad	bnapstad@yahoo.com	Board of Water and Soil Resources	51227 Long Point Place McGregor, MN 55780	Electronic Service	No	OFF_SL_16-777_Official
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-777_Official
J	Newberger	jnewberger1@yahoo.com	State Rep	14225 Balsam Blvd Becker, MN 55308	Electronic Service	No	OFF_SL_16-777_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-777_Official
Rolf	Nordstrom	rnordstrom@gpsd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_16-777_Official
Steven	Nyhus	swnyhus@flaherty-hood.com	Flaherty & Hood PA	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_16-777_Official
Adam	Oliver	N/A		12060 Sherburne Ave Becker City Hall Becker, MN 55308	Paper Service	No	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_16-777_Official
Lee	Paddock	lpaddock@law.gwu.edu	George Washington University Law School	2000 H Street, NW Washington, DC 20052	Electronic Service	No	OFF_SL_16-777_Official
Bob	Patton	bob.patton@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_16-777_Official
Joshua	Pearson	joshua.pearson@edf-re.com	EDF Renewable Energy	15445 Innovation Drive San Diego, CA 92128	Electronic Service	No	OFF_SL_16-777_Official
Ewald	Petersen	Ewald.Petersen@co.sherburne.mn.us		13880 Business Center Sherburne County Government Center Elk River, MN 55330-1692	Electronic Service	No	OFF_SL_16-777_Official
Jason	Pfingsten	jasonpfingsten@libertypaper.com	Liberty Paper Inc	13500 Liberty Ln Becker, MN 55308-4623	Electronic Service	No	OFF_SL_16-777_Official
Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_16-777_Official
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_16-777_Official
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	Box 250 12060 Sherburne Ave Becker, Minnesota 55308	Electronic Service	No	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michelle	Rebholz	michelle.rebholz@state.mn.us	Public Utilities Commission	Suite 350121 Seventh Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-777_Official
Pat	Renner	pat@vote-climate.org		4236 Wooddale Ave S St Louis Park, Minnesota 55416	Paper Service	No	OFF_SL_16-777_Official
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_16-777_Official
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_16-777_Official
Laureen	Ross McCalib	lrossmccalib@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 55369-4718	Electronic Service	No	OFF_SL_16-777_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-777_Official
John	Saxhaug	john_saxhaug@yahoo.com		3940 Harriet Ave Minneapolis, MN 55409	Electronic Service	No	OFF_SL_16-777_Official
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-777_Official
LauraSue	Schlatter	LauraSue.Schlatter@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_16-777_Official
Jamie	Schrenzel	jamie.schrenzel@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Saint Paul, MN 55155	Electronic Service	No	OFF_SL_16-777_Official
Inga	Schuchard	ischuchard@larkinhoffman.com	Larkin Hoffman	8300 Norman Center Drive Suite 1000 Minneapolis, MN 55437	Electronic Service	No	OFF_SL_16-777_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	OFF_SL_16-777_Official
David	Shaffer	DShaffer@MnSEIA.org	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_16-777_Official
Jessie	Smith	jseim@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd Welch, MN 55089	Electronic Service	No	OFF_SL_16-777_Official
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No	OFF_SL_16-777_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_16-777_Official
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	Yes	OFF_SL_16-777_Official
Anna	Sommer	anna@sommerenergy.com	Sommer Energy LLC	PO Box 766 Grand Canyon, AZ 86023	Electronic Service	No	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-777_Official
Mark	Spurr	msspurr@fvbenergy.com	International District Energy Association	222 South Ninth St., Suite 825 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-777_Official
Sean	Stalpes	sean.stalpes@state.mn.us	Public Utilities Commission	121 E. 7th Place, Suite 350 Saint Paul, MN 55101-2147	Electronic Service	Yes	OFF_SL_16-777_Official
Byron E.	Starns	byron.starns@stinson.com	Stinson Leonard Street LLP	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-777_Official
Donna	Stephenson	dstephenson@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-777_Official
John Linc	Stine	john.stine@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_16-777_Official
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-777_Official
Robert	Stupar	rob.stupar@enel.com	Enel Green Power North America, Inc.	816 Connecticut Avenue NW Suite 600 Washington, DC 20006	Electronic Service	No	OFF_SL_16-777_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	Taylor	steve.taylor@co.sherburne.mn.us	Sherburne County	13880 Hwy 10 Elk River, MN 55330	Electronic Service	No	OFF_SL_16-777_Official
Douglas	Tiffany	tiffa002@umn.edu	University of Minnesota	316d Ruttan Hall 1994 Buford Avenue St. Paul, MN 55108	Electronic Service	No	OFF_SL_16-777_Official
Erik J	Tomlinson	erik@sourcewater-solutions.com	SourceWater Solutions	500 Robert St N Unit 508 Saint Paul, MN 55101-4455	Electronic Service	No	OFF_SL_16-777_Official
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_16-777_Official
Erin	Vaughn	evaughn@shb.com	Shook, Hardy & Bacon L.L.P.	2555 Grand Blvd. Kansas City, MO 64108	Electronic Service	No	OFF_SL_16-777_Official
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_16-777_Official
Kodi	Verhalen	kverhalen@briggs.com	Briggs & Morgan	2200 IDS Center 80 South Eighth Street Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-777_Official
Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC	700 Universe Blvd Juno Beach, FL 33408	Electronic Service	No	OFF_SL_16-777_Official
Scott	Weicht	sweicht@a-p.com	Adolfson & Peterson	6701 West 23rd St Minneapolis, MN 55426	Electronic Service	No	OFF_SL_16-777_Official
Jason	Willett	jason.willett@metc.state.mn.us	Metropolitan Council	390 Robert St N Saint Paul, MN 55101-1805	Electronic Service	No	OFF_SL_16-777_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alexis	Williams	williams@fresh-energy.org	Fresh Energy	408 St. Peter St Suite 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_16-777_Official
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_16-777_Official
Cam	Winton	cwinton@mnychamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_16-777_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_16-777_Official
Charles	Zelle	charlie.zelle@state.mn.us	Department of Transportation	MN Dept of Transportation 395 John Ireland Blvd St. Paul, MN 55155	Electronic Service	No	OFF_SL_16-777_Official
Jonathan G.	Zierdt	jzierdt@greatermankato.com	Greater Mankato Growth	1961 Premier Dr Ste 100 Mankato, MN 56001	Electronic Service	No	OFF_SL_16-777_Official
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-777_Official