

August 23, 2019

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

RE: Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources

Docket Nos. E002/M-13-867 and E999/M-14-65

Dear Mr. Wolf:

On May 20, 2019, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period* seeking comment on Northern States Power, d/b/a Xcel Energy's (Xcel's) proposal for an alternative method for calculating the avoided distribution cost component of the Value of Solar (VOS) rate used for its Solar*Rewards Community Solar Garden (CSG) Program. Initial comments were filed on July 19, 2019.

Attached are the reply comments of the Minnesota Department of Commerce (Department) in this matter. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Public Utility Rate Coordinator

SLP/ja Attachment



Before the Minnesota Public Utilities Commission

Reply Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. E002/M-13-867 and E999/M-14-65

I. BACKGROUND INFORMATION

On April 1, 2014, the Commission approved the Department's proposed methodology to calculate the Value of Solar (VOS). The VOS methodology is intended to meet the requirements of Minn. Stat. § 216B.164, Subd, 10 and reflect the value of distributed solar generation to the "utility, its customers and society."

On September 6, 2016, the Commission issued an Order approving the use of the VOS methodology as the basis for the bill credit in Xcel Energy's (Xcel or the Company) Solar*Rewards Community (CSG) Program. In addition, the Commission directed Xcel to calculate a location-specific avoided distribution cost starting with its 2018 VOS rate filing.

In its March 22, 2019 *Order Approving Xcel's Update to the 2019 System-wide Value-of-Solar Tariff Rate with Modifications,* the Commission directed Xcel to file a more fully developed alternative method for calculating the avoided distribution cost component of the VOS by May 1, 2019.

On May 1, 2019, Xcel submitted their proposed avoided distribution cost calculation methodology.

On May 20, 2019, the Commission issued a *Notice of Comment Period* seeking comment on Xcel's proposed avoided distribution cost calculation methodology, seeking responses to these questions:

- Does Xcel's proposal comply with Commission Order?
- Is the proposal sufficiently developed for Commission consideration?
- Does it yield accurate results that are fair and reasonable for all VOS stakeholders?

On August 2, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed a petition requesting approval to use its proposed VOS methodology for its 2020 VOS rate.

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Analyst assigned: Susan L. Peirce

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II. SUMMARY OF INITIAL COMMENT

Comments were filed by the Minnesota Solar Energy Industries Association (MNSEIA), IPS Solar, Fresh Energy, and the Department. Parties appear to recognize that the existing methodology for calculating the avoided distribution capacity cost results in significant volatility, and may warrant revision, but remain concerned that the methodology proposed by Xcel is appropriate. All commenters noted various degrees of concern with Xcel's proposal to reduce the estimated per-kW cost of distribution capacity additions by 50 percent, although the Department recommended that the Commission approve Xcel's method, and require the Company to report annually on its planned and actual distribution spending, along with the placement of CSGs to assist with evaluating the continued reasonableness of Xcel's avoided distribution cost calculation methodology.

MNSEIA's comments largely reflected the concerns of IPS Solar and Fresh Energy, and included additional concerns and specific recommendations. Therefore, the following reply comments focus on MNSEIA's comments.

MNSEIA argued that Xcel's proposal does not capture the full value of avoided distribution costs, and should be modified as follows:

- Add a longer data period;
- Remove the 50 percent discount factor;
- Include a broader set of distribution projects;
- Include more "capacity related projects;" and
- Include avoided investments in distribution plant.

The Department offers its reply comments to MN SEIAs recommendations, below.

III. SUMMARY OF XCEL'S PETITION

In its August 2, 2019 to modify the methodology for calculating the VOS and to use that new methodology in establishing 2020 VOS rates, Xcel provided a calculation of the 2020 VOS rates under the current methodology to support its contention that the methodology for calculating the avoided distribution cost requires modification. Under the current methodology, Xcel calculated the 2020 levelized VOS at \$0.2484 per kWh compared with the 2019 rate of \$0.1109 per kWh. In comparison, Xcel calculates the VOS under its proposed methodology to be \$0.1132 per kWh.

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III. DEPARTMENT REPLY

Under Xcel's proposed methodology, the avoided distribution cost is calculated by dividing the distribution costs for capacity addition projects by the amount of capacity being added. The Company proposed to sum up distribution costs and capacity additions for two historical years and three forecast years for its calculation. MNSEIA recommended using more than five years of data for the calculation, and stated that "distributed solar generation will have an economic life of at least 25 years, and if a new solar installation does not defer a distribution investment immediately, it may contribute to doing so at some other point in its 25-year life."

The Department supported using a combination of historical and forecasted distribution costs and additions as a means of balancing actual and forecasted spending. Including a couple of years of historical spending serves as a check on the Company's forecasts. In addition, the longer the forecast period, the greater the uncertainty that the forecast would be realized.

In an integrated resource plan (IRP), Xcel provides forecasts for a 20-year timeframe, but recommendations and Commission decisions focus most closely on the five-year action plan. In its most recent distribution planning report (Docket No. E002/M-18-251), Xcel provided a five-year forecast of its distribution system. The Department does not object to including the five-year forecast along with the two years of historical data in determining the avoided cost of distribution per kW, but does not recommend extending the data beyond the five-year forecast.

Xcel proposed to reduce the avoided cost of distribution per kW by 50 percent as a means of spreading the risk that a given solar facility will not result in avoided distribution costs. MNSEIA recommended eliminating the 50 percent discount stating "distributed solar generation will have an economic life of at least 25 years, and if a new solar installation does not defer a distribution investment immediately, it may contribute to doing so at some other point in its 25-year life." The Department notes that the fact that a solar facility may not immediately contribute to avoided distribution costs supports some form of discount to reflect that the avoided cost will not occur in one or more years of the facility's economic life. For instance, the avoidance of some level of distribution costs in the 20th year of a facility with a 25-year life does not warrant being paid the avoided distribution cost for the full 25 years of its life. Xcel's proposal to discount the avoided distribution costs by 50 percent may or may not be ideal, but appears to be logical in that it reflects the assumption that some CSGs may enable Xcel to avoid some level of distribution costs in all years, some may result in no avoided distribution costs in all years, and others may result in avoided costs in some years and not in others.

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Finally, MNSEIA indicated that it supports expanding the scope of projects considered as avoided. The Department understands MNSEIA's position to mean that distribution projects that replace existing distribution infrastructure at the end of its life or projects done for reliability purposes, but that secondarily result in increased system capacity, should be included in the calculation of avoided distribution costs. The Department notes that avoided distribution capacity costs are intended to capture avoided costs due to the solar facility existing on the distribution system. Therefore, if a distribution project will be done whether the solar project exists or not, the costs are not avoided

As reflected in Xcel's August 2, 2019 filing, the VOS rates would more than double in 2020 compared with 2019 under the current methodology. The wide swings in rates further demonstrate the need to revise the VOS methodology to ensure more stability in the rates. Unlike utility scale solar projects, CSGs are not required to demonstrate that they are least cost resources. The credits paid to CSG subscribers are paid for by all customers through the fuel clause adjustment, and as such continuing the existing methodology would further increase the cost of CSGs to non-participating customers who are not receiving credits.

The Department concludes that Xcel's proposed methodology for calculating its avoided distribution cost is reasonable and recommends approval and its use for calculating 2020 VOS rates.

IV. DEPARTMENT RECOMMENDATION

The Department recommends the Commission approve Xcel's proposed methodology for calculating the avoided distribution cost component of the Value of Solar calculation, and direct that it be used in the calculation of the 2020 VOS rates.

/ja

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 – REPLY COMMENTS

Docket Nos.	E002/M-13-867
	E999/M-14-65

Dated this 23rd day of August, 2019.

/s/Linda Chavez	

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Michael	Норре	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	SPL_SL_14-65_Interested Parties
David	Horneck	david.g.horneck@xcelener gy.com	Xcel Energy	1800 Larimer Street Denver, CO 80202	Electronic Service	No	SPL_SL_14-65_Interested Parties
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	SPL_SL_14-65_Interested Parties
Matt	Hughes	N/A	Cooperative Network	145 University Ave W, Ste 450 St. Paul, MN 55103-7044	Paper Service	No	SPL_SL_14-65_Interested Parties
Steve	Huso	steve.huso@xcelenergy.co m	Xcel Energy	G.O. 7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
Michael	Jacobs	mjacobs@ucsusa.org	Union of Concerned Scientists	2 Brattle Square Cambridge, MA 02138	Electronic Service	No	SPL_SL_14-65_Interested Parties
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	SPL_SL_14-65_Interested Parties
Dwight	Jelle	dkjelle@gmail.com	Best Power International, LLC	P.O. 5126 Hopkins, MN 55343	Electronic Service	No	SPL_SL_14-65_Interested Parties
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	SPL_SL_14-65_Interested Parties
Richard	Johnson	Rick.Johnson@lawmoss.co m	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	SPL_SL_14-65_Interested Parties
Michael	Kampmeyer	mkampmeyer@a-e- group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mark J.	Kaufman	mkaufman@ibewlocal949.o rg	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	SPL_SL_14-65_Interested Parties
Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave Ste 200 Lakeville, MN 55044	Paper Service	No	SPL_SL_14-65_Interested Parties
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	SPL_SL_14-65_Interested Parties
Kerry	Klemm	kerry.r.klemm@xcelenergy.	Xcel Energy Services, Inc	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	SPL_SL_14-65_Interested Parties
Jon	Kramer	sundialjon@gmail.com	Sundial Solar	3209 W 76th St Edina, MN 55435	Electronic Service	No	SPL_SL_14-65_Interested Parties
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Allen	Krug	allen.krug@xcelenergy.co m	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Scott	Kurtz	Scott.J.Kurtz@xcelenergy.c om	Xcel Energy	825 Rice Street St. Paul, MN 55117	Electronic Service	No	SPL_SL_14-65_Interested Parties
Douglas	Larson	dlarson@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	SPL_SL_14-65_Interested Parties
Amy	Liberkowski	amy.a.liberkowski@xcelen ergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
Tim	Lindl	tlindl@kfwlaw.com	Keyes, Fox & Wiedman LLP	436 14th St, Ste 1305 Oakland, CA 94612	Electronic Service	No	SPL_SL_14-65_Interested Parties
Bob	Long	rlong@larkinhoffman.com	Larkin Hoffman (Silicon Energy)	1500 Wells Fargo Plaza 7900 Xerxes Ave S Bloomington, MN 55431	Electronic Service	No	SPL_SL_14-65_Interested Parties
Susan	Mackenzie	susan.mackenzie@state.m n.us	Public Utilities Commission	121 7th Place E Ste 350 St. Paul, MN 551012147	Electronic Service	No	SPL_SL_14-65_Interested Parties

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Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	SPL_SL_14-65_Interested Parties
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	SPL_SL_14-65_Interested Parties
Jennifer	Martin	N/A	Center for Resource Solutions	1012 Torney Ave, 2nd Floor San Francisco, CA 94129	Paper Service	No	SPL_SL_14-65_Interested Parties
Mary	Martinka	mary.a.martinka@xcelener gy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 Saint Paul, MN 55104-1850	Electronic Service	No	SPL_SL_14-65_Interested Parties
Dave	McNary	David.McNary@hennepin.u s	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL_14-65_Interested Parties
John	McWilliams	John.McWilliams@Dairylan dPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL_14-65_Interested Parties
Herbert	Minke	hminke@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL_14-65_Interested Parties
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL_14-65_Interested Parties

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Dalene	Monsebroten	dalene.monsebroten@nmp agency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	SPL_SL_14-65_Interested Parties
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Ben	Nelson	benn@cmpasgroup.org	СММРА	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	SPL_SL_14-65_Interested Parties
Dale	Niezwaag	dniezwaag@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503	Electronic Service	No	SPL_SL_14-65_Interested Parties
David	Niles	david.niles@avantenergy.c om	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	SPL_SL_14-65_Interested Parties
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	SPL_SL_14-65_Interested Parties
Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_14-65_Interested Parties
Kate	O'Connell	kate.oconnell@state.mn.us	Department of Commerce	Suite 50085 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	SPL_SL_14-65_Interested Parties

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Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	SPL_SL_14-65_Interested Parties
Nick	Paluck	nick.paluck@xcelenergy.co m	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
James	Pearson	james.g.pearson@xcelener gy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mary Beth	Peranteau	mperanteau@wheelerlaw.c om	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	SPL_SL_14-65_Interested Parties
Donna	Pickard	dpickardgsss@gmail.com	Genie Solar Support Services	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_14-65_Interested Parties
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mark	Rathbun	mrathbun@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	SPL_SL_14-65_Interested Parties
Michael	Reinertson	michael.reinertson@avante nergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
John C.	Reinhardt		Laura A. Reinhardt	3552 26Th Avenue South Minneapolis, MN 55406	Paper Service	No	SPL_SL_14-65_Interested Parties

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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	SPL_SL_14-65_Interested Parties
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	SPL_SL_14-65_Interested Parties
Enio	Ricci	ericci@invenergyllc.com	Invenergy LLC	17830 New Hampshire Ave Ste 300 Ashton, MD 20861	Paper Service	No	SPL_SL_14-65_Interested Parties
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	SPL_SL_14-65_Interested Parties
Richard	Savelkoul	rsavelkoul@martinsquires.c om	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	SPL_SL_14-65_Interested Parties
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	SPL_SL_14-65_Interested Parties
Christopher	Schoenherr	cp.schoenherr@smmpa.or g	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	SPL_SL_14-65_Interested Parties
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	SPL_SL_14-65_Interested Parties
Kevin	Schwain	Kevin.D.Schwain@xcelene rgy.com	Xcel Energy	404 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dean	Sedgwick	Sedgwick@Itascapower.co m	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	SPL_SL_14-65_Interested Parties
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	SPL_SL_14-65_Interested Parties
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	SPL_SL_14-65_Interested Parties
Gary	Shaver	gshaver@silicon- energy.com	Silicon Energy	3506 124th St NE Marysville, WA 98271	Electronic Service	No	SPL_SL_14-65_Interested Parties
Erin	Shea	eshea@silicon-energy.com	Silicon Energy	PO Box 376 8787 Silicon Way Mt Iron, MN 55768	Electronic Service	No	SPL_SL_14-65_Interested Parties
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	SPL_SL_14-65_Interested Parties
Joshua	Smith	joshua.smith@sierraclub.or g		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No	SPL_SL_14-65_Interested Parties
Trevor	Smith	trevor.smith@avantenergy.	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Ken	Smith	ken.smith@districtenergy.c om	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Beth H.	Soholt	bsoholt@windonthewires.or g	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	SPL_SL_14-65_Interested Parties
Russ	Stark	Russ.Stark@ci.stpaul.mn.u s	City of St. Paul	390 City Hall 15 West Kellogg Bou Saint Paul, MN 55102	Electronic Service levard	No	SPL_SL_14-65_Interested Parties
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_14-65_Interested Parties
Thomas P.	Sweeney III	tom.sweeney@easycleane nergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	SPL_SL_14-65_Interested Parties
Lynnette	Sweet	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	SPL_SL_14-65_Interested Parties
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_14-65_Interested Parties

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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	SPL_SL_14-65_Interested Parties
Gracie	Walovich	gracie@allianceforsolarchoi ce.com	The Alliance for Solar Choice	595 Market St FL 29 San Francisco, CA 94105	Electronic Service	No	SPL_SL_14-65_Interested Parties
Roger	Warehime	warehimer@owatonnautiliti es.com	Owatonna Public Utilities	208 South WalnutPO Box 800 Owatonna, MN 55060	Electronic Service	No	SPL_SL_14-65_Interested Parties
Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind	618 2nd Ave SE Minneapolis, MN 55414	Electronic Service	No	SPL_SL_14-65_Interested Parties
Scott M.	Wilensky	scott.wilensky@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
Steven	Wishart	steven.w.wishart@xcelener gy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
Robyn	Woeste	robynwoeste@alliantenerg y.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	SPL_SL_14-65_Interested Parties
Thomas J.	Zaremba	TZaremba@wheelerlaw.co m	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	SPL_SL_14-65_Interested Parties