

September 10, 2019

PUBLIC DOCUMENT NOT PUBLIC DATA HAS BEEN EXCISED

Mr. Daniel P. Wolf Executive Secretary Minnesota Public Utilities Commission 121 7th Place East, Suite 350 St. Paul, MN 55101-1247

RE: REVISED FILING

2019 COGENERATION AND SMALL POWER PRODUCTION

DOCKET NO. E999/PR-19-9

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this revised filing of our 2019 cogeneration and small power production report in response to the Commission's August 30, 2019 NOTICE OF SUPPLEMENTAL COMMENT PERIOD.

The Company has reviewed its January 2, 2019 report and identified data that was originally designated as trade secret that we have determined can be provided publicly. The data we identified can be accessed in other regulatory filings publicly or can be derived using publicly available information. We appreciate this opportunity to revise the trade secret designations in this report.

We provide as Attachment A the pages where we have updated the trade secret designation in Schedules A and G of the report. Page 1 of Attachment A provides Code Keys (A through E) that provide the reasons for changing the designations of specific cells. These Code Keys are then reflected on the remaining pages of Attachment A in or near specific cells whose designation has been changed. Attachment B contains the revised Schedules A through H in their entirety and reflects the changes in designation provided in Attachment A. Attachment C is an informational copy of the tariff sheets effective April 1, 2019 that had been proposed in the January 2, 2019 report.

Certain information provided in Attachments A and B of this filing meets the definition of trade secret information pursuant to Minn. Stat. § 13.37. In particular, release of this information would undermine the Company's resource bidding process by providing potential suppliers with a compilation of competitive information that

derives independent economic value from not being generally known or ascertainable. This information includes data regarding costs of energy from possible new generating facilities that is not otherwise public. Disclosure of this information could result in higher costs of energy for Xcel Energy customers by allowing potential suppliers to modify their pricing from what they would otherwise bid. Further, as explained in the February 22 and March 18 filings of Xcel Energy in this matter, the Company and its third-party vendors have taken steps to protect the confidentiality of the designated protected information. This includes cost and related information on specific operating plants, and some of these plants are owned by third parties. Also, the forward looking data in Schedule A is obtained through a subscription service from a third-party and is protected and cannot be publicly released. Therefore, the Company has designated certain portions of this filing as trade secret.

Please contact me at <u>lisa.r.peterson@xcelenergy.com</u> or 612-330-7681 or Jennifer Roesler at <u>jennifer.roesler@xcelenergy.com</u> or 612-330-1925 if you have any questions regarding this matter.

Sincerely,

/s/

LISA PETERSON MANAGER, REGULATORY ANALYSIS

Enclosures

Docket No. E999/PR-19-9 Revised Filing Attachment A Page 1 of 4

Rationale for change in Trade Secret Designation

Code Rationale

- (A) Publicly available data (Tariffed Rate).
- (B) Can be calculated or approximated using publicly available data.
- (C) This type of data is publicly available in other dockets.
- (D) Weighted After-tax Cost of Capital from Rate Case (Docket No. E002/GR-15-826).
- (E) Actual unit cost, proprietary due to competition risk.

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Minnesota Public Utilities Commission

DOCKET NO. E999/PR-19-9

Reporting Period:

January 1 - December 31, 2019

Cogeneration and Small Power Production Tariff

Utility:

Xcel Energy

Minn. Rules 7835.0500 Schedule A: Estimated Energy Costs

Schedule A must contain the estimated system average incremental energy costs by seasonal peak and off-peak periods for each of the next five years. For each seasonal period, system incremental energy costs must be averaged during system daily peak hours, system daily off-peak hours, and all hours in the season. The energy costs must be increased by a factor equal to 50 percent of the line losses shown in schedule B. Schedule A must describe in detail the method used to determine the on-peak and off-peak hours and seasonal periods and must show the resulting on-peak and off-peak and seasonal hours selected.

Please include all computation descriptions in Schedule G

2019 2020 2021 2022						
			PROTECTED DATA BEGINS			
Summer	On Peak	31.94 (A)				
	Off Peak	18.47 (A)				
	All Hours	23.09 (A)				
Winter	On Peak	29.41 (A)				
	Off Peak	21.17 (A)				
	All Hours	24.05 (A)				
Annual	On Peak	30.26 (B)				
	Off Peak	20.27 (B)				
	All Hours	23.71 (B)				
						PROTECTED DATA EN
nual # hours on	-peak:	3045				

	Description of season and on-peak and off-peak periods					
Summer:	June - September					
Winter:	October - May					
On-peak period:	The on peak period contains all hours between 9:00 a.m. and 9:00 p.m., Monday through Friday, except the following holidays: New Year's Day, Good Friday, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. When a designated holiday occurs on Saturday, the preceding Friday will be designated a holiday. When a designated holiday occurs on Sunday, the following Monday will be designated a holiday.					
Off-peak period:	The off peak period contains all other hours not included in the on peak period. Definition of on peak and off peak period is subject to change with change in Company's system operating characteristics.					

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Minnesota Public Utilities Commission

Cogeneration and Small Power Production Tariff

DOCKET NO. E999/PR-19-9 Reporting Period: January 1 - December 31, 2019

Utility: Xcel Energy

Minn. Rules 7835.1000 Schedule G: Computations and Descriptions

Schedule G must contain and describe all computations made by the utility in determining Schedules A and B. Please use the space below to show your calculations. Refer to Minn. Rules 7835.0500-7835.0600 for detailed computation descriptions, especially for Schedule B Subp. 5 and 6.

NUMBER OF PEAK HOURS

The on peak period

. . contains all other

On-Peak Hour Block

	On-Peak	Off-Peak
Winter	2,023	3,809
Summer	1,022	<u>1,906</u>
Total	3,045	5,715
On-Peak Days/Week	5	Days

	Day in Month	On Peak Hours	Off Peak Hours
June	30	257	463
July	31	266	478
4th of July		-12	12
August	31	266	478
September	30	257	463
Labor Day		-12	12
October	31	266	478
November	30	257	463
Thanksgiving		-12	12
December	31	266	478
Christmas		-12	12
January	31	266	478
New Year's Day		-12	12
February	28	240	432
March	31	266	478
Easter		-12	12
April	30	257	463
May	31	266	478
Memorial Day		<u>-12</u>	<u>12</u>
		3,045	5,715

MARGINAL ENERGY COST CALCULATION

Marginal Energy Costs (\$/MWh)		2019	2020	2021	2022	2023
			PROTECTED DATA	BEGINS		
Summer	On Peak	30.73 (B)				
	Off Peak	17.89 (B)				
	All Hours	22.31 (B)				
Winter	On Peak	28.36 (B)				
	Off Peak	20.52 (B)				
	All Hours	23.28 (B)				
Annual	On Peak	29.14 (B)				
	Off Peak	19.63 (B)				
	All Hours	22.96 (B)				

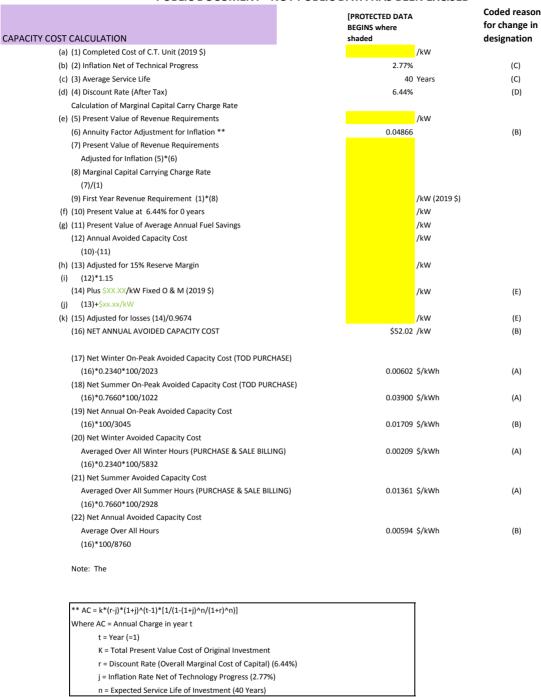
12 Hours

PROTECTED DATA ENDS]

Loss Factors	Summer On-Peak	Summer Off-Peak	Average Summer	Winter On-Peak	Winter Off-Peak	Average Winter
Overall	0.9240	0.9374	0.9327	0.9288	0.9388	0.9359
50% of Overall	0.9620	0.9687	0.9664	0.9644	0.9694	0.9680
Adj. Marginal En	ergy Costs (\$/MWh)	2019	2020	2021	2022	2023
		[1	PROTECTED DATA BEGIN	IS		
Summer	On Peak	31.94 (A)				
	Off Peak	18.47 (A)				

Off Peak 23.09 (A) Winter 29.41 (A) 21.16 (A) Off Peak 24.05 (A) All Hours Annual On Peak 30.26 (B) Off Peak 20.27 (B) 23.71 (B) All Hours PROTECTED DATA ENDS]

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(I) Summer Percent: 76.60%

(m) Winter Percent: 23.40%

Total: 100.00%

(n) O & M

PROTECTED DATA ENDS]

(E)

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Minnesota Public Utilities Commission		
DOCKET NO. E999/PR-19-9	Reporting Period:	January 1 - December 31, 201
Cogeneration and Small Power Production Tariff	Utility:	Xcel Energ

Minn. Rules 7835.0500 Schedule A: Estimated Energy Costs

Schedule A must contain the estimated system average incremental energy costs by seasonal peak and off-peak periods for each of the next five years. For each seasonal period, system incremental energy costs must be averaged during system daily peak hours, system daily off-peak hours, and all hours in the season. The energy costs must be increased by a factor equal to 50 percent of the line losses shown in schedule B. Schedule A must describe in detail the method used to determine the on-peak and off-peak hours and seasonal periods and must show the resulting on-peak and off-peak and seasonal hours selected.

Please include all computation descriptions in Schedule G

	Estimated Marginal Energy Costs (\$/MWh)						
2019 2020 2021 2022 202						2023	
			[PROTECTED DATA BEGINS	S			
Summer	On Peak	31.94					
	Off Peak	18.47					
	All Hours	23.09					
Winter	On Peak	29.41					
	Off Peak	21.17					
	All Hours	24.05					
Annual	On Peak	30.26					
	Off Peak	20.27					
	All Hours	23.71					
						PROTECTED DATA ENDS]	
Annual # hours on	-peak:	3045					

	Description of season and on-peak and off-peak periods				
Summer:	June - September				
Winter:	October - May				
On-peak period:	The on peak period contains all hours between 9:00 a.m. and 9:00 p.m., Monday through Friday, except the following holidays: New Year's Day, Good Friday, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. When a designated holiday occurs on Saturday, the preceding Friday will be designated a holiday. When a designated holiday occurs on Sunday, the following Monday will be designated a holiday.				
Off-peak period:	The off peak period contains all other hours not included in the on peak period. Definition of on peak and off peak period is subject to change with change in Company's system operating characteristics.				

1 of 6 2. Schedule A

Page 2 of 14 PUBLIC DOCUMENT - NOT PUBLIC DATA HAS BEEN EXCISED Minnesota Public Utilities Commission DOCKET NO. E999/PR-19-9 Reporting Year: January 1 - December 31, 2019 Cogeneration and Small Power Production Tariff Utility: Xcel Energy Minn. Rules 7835.0600 Schedule B: Estimated Capacity Costs Subp. 7. Avoidable capacity costs Planned facility additions or If the utility has neither planned generating Fill out Schedule B Subp. 2. Description of all planned utility generating facility additions anticipated during the next ten years, including: Unit 2 Unit 4 Unit 5 Unit 6 Unit 1 Unit 3 Black Dog 6 CT Mankato Energy Center 2016 Wind RFP BOT 2016 Wind Self-Build TBD CT TBD CC 215 MW (design) 215 MW (design) B. Nameplate Rating 762 (design) Various Various 835 (planning) . Fuel Type Natural Gas 6/1/2019 D. In-Service Date 6/1/2019 2019-2021 2019-2020 2025 (MISO PY 25/26) 2027 (MISO PY 27/28) (MISO PY 19/20 Capa (MISO PY 19/20 Capacity Credit) [PROTECTED DATA BEGINS E. Completed Cost in \$/kW in the year in which the plant is expected to be put in service, including allowance for funds used during construction F. Anticipated average annual fixed operating an maintenance costs in \$/kW G. Energy costs associated with the unit, including uel costs and variable operating and maintenance costs (\$/MWh) H. Projected average number of kWh/year the plant will generate during its useful life PROTECTED DATA ENDS] Average annual fuel savings resulting from the addition of this generating facility, stated in \$/kW Subp. 3. Description of all planned firm capacity purchases, other than from qualifying facilities, during the next ten years, including: Purchase 5 A. Year of Purchase C. Number of kW of capacity to be purchased D. Capacity cost in \$/kW Purchase 8 Purchase 7 Purchase 9 Purchase 10 Purchase 11 Purchase 12 A. Year of Purchase B. Name of the seller C. Number of kW of capacity to be purchased D. Capacity cost in \$/kW E. Associated energy costs in cents/kWh Purchase 13 Purchase 14 Purchase 15 Purchase 16 Purchase 17 Purchase 18 A. Year of Purchase 3. Name of the seller C. Number of kW of capacity to be purchased D. Capacity cost in \$/kW . Associated energy costs in cents/kWh Subp. 4. Utility's overall average percentage of line losses due to distribution, transmission, and transformation of electric energy Average Annual line loss Average Summer 0.9327 Summer On-Peak Summer Off-Peak Winter On-Peak 0.9288 Winter Off-Peak 0.9388 Average Winter 0.9359 Loss Factors 0.9240 0.9374

Supp. 5 Net allitual avoided capacity cost - Please show calculations in scriedule 9							
Averaged on Peak hours (\$/kWh)	0.01709	The utility's net annual avoided capacity cost stated in dollars per kilowatt-hour averaged over the on-peak hours and the utility's net annual					
Average Over All Hours (\$/kWh) 0.00594		avoided capacity cost stated in dollars per kilowatt-hour averaged over all hours.					

Subp. 6 Net annual avoided capacity cost - Please show calculations in Schedule G						
Averaged on Peak hours		If the utility has no planned generating facility additions for the ensuing ten years, but has planned additional capacity purchases, other than				
verage Over All Hours from qualifying facilities, during the ensuing ten years, schedule B must contain its net annual avoided capacity cost stated in dollars per						

2 of 6 3. Schedule B

Minnesota Public Utilities Commission

DOCKET NO. E999/PR-19-9 Reporting Period: January 1 - December 31, 2019
Cogeneration and Small Power Production Tariff Utility: Xcel Energy

Minn. Rules 7835.0650 Schedule C: Calculation, Average Retail Energy Rate

7835.0100 DEFINITIONS. Subp. 2a. Average retail utility energy rate. "Average retail utility energy rate" means, for any class of utility customer, the quotient of the total annual class revenue from sales of electricity minus the annual revenue resulting from fixed charges, divided by the annual class kilowatt-hour sales. Data from the most recent 12-month period available before each filing required by parts 7835.0300 to 7835.1200 must be used in the computation.

Rate Class	Total Class Revenue	Fixed Charges	kWh Sales	Average Retail Energy Rate
Annual (January - December)				
Residential	\$1,251,519,802	\$120,289,277	8,877,323,755	\$0.12743
Small General (Non-Demand)	<u>\$102,682,453</u>	<u>\$9,042,917</u>	789,101,244	<u>\$0.11867</u>
Non-Demand Metered	\$1,354,202,255	\$129,332,194	9,666,424,999	\$0.12671
General (Sec Volt - Demand)	\$563,542,464	\$12,866,158	8,030,346,752	\$0.06857
Summer (June - September)				
Residential	\$497,463,120	\$40,121,668	3,446,520,801	\$0.13270
Small General (Non-Demand)	\$36,479,458	\$3,002,931	265,627,498	\$0.12603
Non-Demand Metered	\$533,942,578	\$43,124,599	3,712,148,299	\$0.13222
General (Sec Volt - Demand)	\$205,290,478	\$4,276,487	2,897,070,599	\$0.06939
Winter (October - May)				
Residential	\$754,056,683	\$80,167,609	5,430,802,954	\$0.12409
Small General (Non-Demand)	\$66,202,995	\$6,039,986	523,473,746	\$0.11493
Non-Demand Metered	\$820,259,677	\$86,207,595	5,954,276,700	\$0.12328
General (Sec Volt - Demand)	\$358,251,986	\$8,589,671	5,133,276,153	\$0.06812

3 of 6 4. Schedule C

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Docket No. E999/PR-19-9

Schedule D Page 1 of 5

Northern States Power Company, a Minnesota corporation Minneapolis, Minnesota 55401

MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2

STANDARD CONTRACT AND AGREEMENT FORMS

Section No. 9 1st Revised Sheet No. 9

Listed below are the titles of standard contract or service agreement forms Company requires of customers for cogeneration and small power production purchase services. Copies of the forms are shown on the following sheets in the order listed.

1. Uniform Statewide Contract for Cogeneration and Small Power Production Facilities

Т

The form for the Uniform Statewide Contract must be applied to all new and existing interconnections between the Company and cogeneration and small power production facilities having less than 1,000 kilowatts AC of N capacity except that any existing interconnection contract executed between the Company and a QF with N capacity of less than 40 kilowatts AC remains in force until terminated by mutual agreement of the parties or as otherwise specified in the contract.

Date Filed: 03-11-16 By: Christopher B. Clark Effective Date: 07-21-17

President, Northern States Power Company, a Minnesota Corporation

Docket No. E002/M-16-222 Order Date: 05-22-17

Docket No. E999/PR-19-9 Revised Filing Attachment B Page 5 of 14

Docket No. E999/PR-19-9

Schedule D Page 2 of 5

Northern States Power Company, a Minnesota corporation Minneapolis, Minnesota 55401 MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2

UNIFORM STATEWIDE CONTRACT FOR COGENERATION AND SMALL POWER PRODUCTION FACILITIES

Docket No.

E002/M-16-222

Section No. 9 2nd Revised Sheet No. 10

Order Date:

05-22-17

		NIFORM STATEWIDE CONTR ON AND SMALL POWER PRO		
Minnesot	a corporation and wholly ov	wned subsidiary of Xcel Energy	The state of the s	
		RECITALS		
facilities),			t	C
The QF is	s prepared to generate elec	tricity in parallel with the Utility.		
(hereafte	r called "Commission") rule:		Minnesota Public Utilities Commission ower Production and any technical horized by those rules.	
	y is obligated under federal or sale by the QF.	and Minnesota law to interconn	nect with the QF and to purchase electricity	
A contrac	t between the QF and the l	Utility is required by the Commis	ssion's rules.	
		AGREEMENTS		
1. The	and the Utility agree: Utility will sell electricity to QF belongs.	the QF under the rate schedule	e in force for the class of customer to which	Т
und	-		ectric Utility will buy electricity from the QF e QF elects the rate schedule category	c
-	a. Average retail utility	y energy rate under part 7835.3	300.	
-	b. Simultaneous purc	hase and sale billing rate under	part 7835.3400.	
-	c. Time-of-day purcha	ase rates under part 7835.3500.		
A copy of	the presently filed rate sch	edule is attached to this contract	ct.	C
		(Continued on Sheet No.	9-10.1)	
Date File		By: Christopher E		21-17

Docket No. E999/PR-19-9 Revised Filing Attachment B Page 6 of 14

Docket No. E999/PR-19-9 Schedule D Page 3 of 5

Section No. 9

Original Sheet No. 10.1

Northern States Power Company, a Minnesota corporation Minneapolis, Minnesota 55401

MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2

UNIFORM STATEWIDE CONTRACT FOR COGENERATION AND SMALL POWER PRODUCTION FACILITIES (Continued)

3.	The Utility will buy electricity from the QF under the current rate schedule filed with the Commission. If the QF has less than 40 kilowatts capacity, the QF elects the rate schedule category hereinafter indicated:	N
	a. Average retail utility energy rate under part 7835.4013.	
	b. Simultaneous purchase and sale billing rate under part 7835.4014.	
	c. Time-of-day purchase rates under part 7835.4015.	
A co	ppy of the presently filed rate schedule is attached to this contract.	
4.	The Utility will buy electricity from the QF under the current rate schedule filed with the Commission. If the QF is not a net metered facility and has at least 40 kilowatts capacity but less than 1,000 kilowatt capacity, the QF elects the rate schedule category hereinafter indicated:	
	a. Simultaneous purchase and sale billing rate under part 7835.4014.	
	b. Time-of-day purchase rates under part 7835.4015.	
A co	opy of the presently filed rate schedule is attached to this contract.	
5.	The Utility will buy electricity from a net metered facility under the current rate schedule filed with the Commission or will compensate the facility in the form of a kilowatt-hour credit on the facility's energy bill. If the net metered facility has at least 40 kilowatts capacity but less than 1,000 kilowatts capacity, the QF elects the rate schedule category hereinafter indicated (choose par. a, and then also choose either par. b or par. c):	
	a. Kilowatt-hour energy credit on the customer's energy bill, carried forward and applied to subsequent energy bills, with an annual true-up under part 7835.4017.	
	b. Simultaneous purchase and sale billing rate under part 7835.4014.	
	c. Time-of-day purchase rates under part 7835.4015.	
A co	opy of the presently filed rate schedule is attached to this contract.	N
6.	The rates for sales and purchases of electricity may change over the time this contract is in force, due to actions of the Utility or of the Commission, and the QF and the Utility agree that sales and purchases will be made under the rates in effect each month during the time this contract is in force.	TI I

(Continued on Sheet No. 9-11)

Date Filed: 03-11-16 By: Christopher B. Clark Effective Date: 07-21-17

President, Northern States Power Company, a Minnesota corporation

Docket No. E002/M-16-222 Order Date: 05-22-17

Docket No. E999/PR-19-9 Revised Filing Attachment B Page 7 of 14

Docket No. E999/PR-19-9

Schedule D Page 4 of 5

Northern States Power Company, a Minnesota corporation Minneapolis, Minnesota 55401 MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2

UNIFORM STATEWIDE CONTRACT FOR COGENERATION AND SMALL POWER PRODUCTION FACILITIES (Continued)

Section No. 9 1st Revised Sheet No. 11

7.	The Utility will compute the charges and payments for purchases and sales for each billing period. Any net credit to the QF, other than kilowatt-hour credits under clause 5, will be made under one of the following options as chosen by the QF.	TI C
	a. Credit to the QF's account with the Utility.	
	b. Paid by check to the QF within 15 days of the billing date.	L
8.	Renewable energy credits associated with generation from the facility are owned by:	N N
9.	The QF must operate its electric generating facilities within any rules, regulations, and policies adopted by the Utility not prohibited by the Commission's rules on Cogeneration and Small Power Production which provide reasonable technical connection and operating specifications for the QF (Northern States Power Company's Rules and Regulations Applicable to Cogeneration and Small Power Production Facilities are attached). This agreement does not waive the QF's right to bring a dispute before the Commission as	Т
	authorized by Minnesota Rules, part 7835.4500, and any other provision of the Commission's rules on Cogeneration and Small Power Production authorizing Commission resolution of a dispute.	С
10.	The Utility's rules, regulations, and policies must conform to the Commission's rules on Cogeneration and Small Power Production.	Т
11.	The QF will operate its electric generating facilities so that they conform to the national, state, and local electric and safety codes, and will be responsible for the costs of conformance.	Т
12.	The QF is responsible for the actual, reasonable costs of interconnection which are estimated to be \$ The QF will pay the Utility in this way:	Т
13.	The QF will give the Utility reasonable access to its property and electric generating facilities if the configuration of those facilities does not permit disconnection or testing from the Utility's side of the interconnection. If the Utility enters the QF's property, the Utility will remain responsible for its personnel.	Т
14.	The Utility may stop providing electricity to the QF during a system emergency. The Utility will not discriminate against the QF when it stops providing electricity or when it resumes providing electricity.	Т

(Continued on Sheet No. 9-12)

Date Filed: 03-11-16 By: Christopher B. Clark Effective Date: 07-21-17

President, Northern States Power Company, a Minnesota corporation

Docket No. E002/M-16-222 Order Date: 05-22-17

Docket No. E999/PR-19-9 Revised Filing Attachment B Page 8 of 14

Docket No. E999/PR-19-9 Schedule D Page 5 of 5

Northern States Power Company, a Minnesota corporation Minneapolis, Minnesota 55401 MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2

UNIFORM STATEWIDE CONTRACT FOR COGENERATION AND SMALL POWER PRODUCTION FACILITIES (Continued)

Section No. 9
1st Revised Sheet No. 12

FAC	CILITIES (Continued)					
15.	The Utility may stop purchasing electricity from the QF when necessary for the Utility to construct, install, maintain, repair, replace, remove, investigate, or inspect any equipment or facilities within its electric system. The Utility will notify the QF before it stops purchasing electricity in this way:					
16.	interconnection, and operation of its electric genera	personal or property damage due to the installation, ting facilities. The amount of insurance coverage will nt with the Commission's interconnection standards	T C C			
17.		ned by the QF and the Utility. This contract will remain notice to the other that the contract is canceled. This en.	Т			
18.	This contract contains all the agreements made between the QF and the Utility except that this contract shall at all times be subject to all rules and orders issued by the Public Utilities Commission or other government agency having jurisdiction over the subject matter of this contract. The QF and the Utility are not responsible for any agreements other than those stated in this contract.					
EVII		ACT AND AGREE TO BE BOUND BY ITS TERMS. AS TH SIGNED THIS CONTRACT BELOW ON THE DATE				
QF		NORTHERN STATES POWER COMPANY, a Minnesota corporation and wholly owned subsidiary of Xcel Energy Inc.				
Ву		Ву				
(Title	e)	(Title)				

Date Filed: 03-11-16 By: Christopher B. Clark Effective Date: 07-21-17

President, Northern States Power Company, a Minnesota Corporation

Docket No. E002/M-16-222 Order Date: 05-22-17

Docket No. E999/PR-19-9 Revised Filing Attachment B Page 9 of 14

Northern States Power Company Electric Utility - State of Minnesota Cogeneration and Small Power Production Tariff Filing Docket No. E999/PR-19-9 Schedule E Page 1 of 2

The safety standards, required operating procedures for interconnected operations, and the functions to be performed by any control and protective apparatus follow:

SAFETY STANDARDS

- 1. Customer agrees to locate the qualifying facility so as to not cause a hazard to the Xcel Energy distribution system. Wind generators may only be installed at Xcel Energy-approved locations that preclude any possibility of the generation system contacting any Xcel Energy facilities if the system accidentally topples over. The total tower height, including the propeller when in the highest position, must be used in the determination.
- 2. The connection of the qualifying facility (QF) to the Xcel Energy distribution system must be made through a customer-provided, customer-installed, manual safety disconnect switch of adequate ampere capacity. The switch shall not open the neutral when the switch is open and must provide a visible disconnect. This switch shall have provisions for being padlocked in the open position with a standard Xcel Energy padlock. Customer agrees to locate the switch in a position accessible to Xcel Energy personnel, and further agrees the switch may be operated by Xcel Energy personnel at all times that such operation is deemed necessary by Xcel Energy for safety and operating reasons. QF's using line-commutated synchronous inverters shall have the inverters connected on the load side (QF side) of the safety disconnect switch.
- 3. Customer agrees to supply Xcel Energy a schematic diagram and associated equipment list for the qualifying facility (QF) control circuitry to enable Xcel Energy to determine if the QF's safety equipment provides a level of safety consistent with the safety level required by Xcel Energy in its electric equipment. If further analysis of the proposed QF by Xcel Energy reveals that it is capable of backfeed into the Xcel Energy lines during distribution outages, customer shall immediately disconnect the QF from Xcel Energy distribution system and shall only reconnect the QF through a customer-provided, Xcel Energy-approved, interconnect device that will prevent said backfeed.
- 4. Customer understands and agrees that as additional qualifying facilities are connected to the Xcel Energy distribution system, Xcel Energy may require customer to install further additional safety devices at customer expense.

Northern States Power Company Electric Utility - State of Minnesota Cogeneration and Small Power Production Tariff Filing Docket No. E999/PR-19-9 Schedule E Page 2 of 2

OPERATING PROCEDURES

- 1. Customer agrees to disconnect the qualifying facility (QF) from the Xcel Energy distribution system or to reimburse Xcel Energy for cost of necessary system modifications if operation of the QF causes radio, television, or electrical service interference to other customer or interference with the operation of Xcel Energy's system.
- 2. Since the power factor and the voltage at which Company's system and customer's system are operated will vary, each party agrees to operate his system at a power factor as near unity as possible in such manner as to absorb his share of the reactive power, and voltage as conducive to the best operating standards.

FUNCTIONS OF REQUIRED CONTROL & PROTECTIVE EQUIPMENT

- 1. Customer shall provide the necessary equipment as approved by Xcel Energy to operate the qualifying facility (QF) in parallel with Xcel Energy's distribution system. The QF shall be equipped to instantaneously discontinue all output to and energization of Xcel Energy's distribution system under the following conditions:
 - A. De-energized Xcel Energy system
 - B. Sustained line faults on Xcel Energy system
 - C. Faults on customer's system
- 2. Customer agrees to effectively ground the qualifying facility installation and to provide and install adequate surge arrester protection to prevent lightning damage to any Xcel Energy distribution system equipment.
- 3. Customer shall consult with Xcel Energy regarding these minimum requirements, additional protection recommended, and proper operation of customer's generating system.

TECHNICAL INTERRCONNECTION REQUIREMENTS

The customer's QF shall comply with the "Distributed Generation Interconnection Requirements" which are described in Section 10 of the Minnesota Electric Rate Book. These interconnection requirements are the technical standards authorized by the MPUC and are consistent with the Commission's Rules, Chapter 7835, on Cogeneration and Small Power Production.

Docket No. E999/PR-19-9 Revised Filing Attachment B Page 11 of 14

Northern States Power Company Electric Utility - State of Minnesota Cogeneration and Small Power Production Tariff Filing Docket No. E999/PR-19-9 Schedule F Page 1 of 1

At this time, the Company has no plans to interrupt the purchase of electric energy or capacity from qualifying facilities because of extraordinary operational circumstances which would make the costs of purchases during those periods greater than the costs of internal generation. Therefore, no procedures exist for notifying qualifying facilities of such interruptions.

PUBLIC DOCUMENT - NOT PUBLIC DATA HAS BEEN EXCISED

Minnesota Public Utilities Commission

DOCKET NO. E999/PR-19-9

Reporting Period: January 1 - December 31, 2019 **Utility: Cogeneration and Small Power Production Tariff Xcel Energy**

Minn. Rules 7835.1000 Schedule G: Computations and Descriptions

Schedule G must contain and describe all computations made by the utility in determining Schedules A and B. Please use the space below to show your calculations. Refer to Minn. Rules 7835.0500-7835.0600 for detailed computation descriptions, especially for Schedule B Subp. 5 and 6.

NUMBER OF PEAK HOURS

The on peak period

contains all other

	On-Peak	Off-Peak
Winter	2,023	3,809
Summer	1,022	<u>1,906</u>
Total	3,045	5,715
On-Peak Days/Week	5	Days
On-Peak Hour Block	k Hour Block 12 Hours	

June	30	257	463
July	31	266	478
4th of July		-12	12
August	31	266	478
September	30	257	463
Labor Day		-12	12
October	31	266	478
November	30	257	463
Thanksgiving		-12	12
December	31	266	478
Christmas		-12	12
January	31	266	478
New Year's Day		-12	12
February	28	240	432
March	31	266	478
Easter		-12	12
April	30	257	463
May	31	266	478
Memorial Day		<u>-12</u>	<u>12</u>
		3,045	5,715

MARGINAL ENERGY COST CALCULATION

Marginal Ener	gy Costs (\$/MWh)	2019	2020	2021	2022	2023
			[PROTECTED DATA B	EGINS		
Summer	On Peak	30.73				
	Off Peak	17.89				
	All Hours	22.31				
Winter	On Peak	28.36				
	Off Peak	20.52				
	All Hours	23.28				
Annual	On Peak	29.14				
	Off Peak	19.63				
	All Hours	22.96				

PROTECTED DATA ENDS

Loss Factors	Summer On-Peak	Summer Off-Peak	Average Summer	Winter On-Peak	Winter Off-Peak	Average Winter	
Overall	0.9240	0.9374	0.9327	0.9288	0.9388	0.9359	
50% of Overall	0.9620	0.9687	0.9664	0.9644	0.9694	0.9680	
Adj. Marginal En	ergy Costs (\$/MWh)	2019	2020	2021	2022	2023	
			[PROTECTED DATA BEG	GINS			
Summer	On Peak	31.94					
	Off Peak	18.47					
	All Hours	23.09					
Winter	On Peak	29.41					
	Off Peak	21.17					
	All Hours	24.05					
Annual	On Peak	30.26					
	Off Peak	20.27					
	All Hours	23.71					
						PROTECTED DATA EN	

PROTECTED DATA ENDS]

PUBLIC DOCUMENT - NOT PUBLIC DATA HAS BEEN EXCISED

[PROTECTED DATA **BEGINS** where CAPACITY COST CALCULATION shaded (a) (1) Completed Cost of C.T. Unit (2019 \$) /kW (b) (2) Inflation Net of Technical Progress 2.77% (c) (3) Average Service Life 40 Years (d) (4) Discount Rate (After Tax) 6.44% Calculation of Marginal Capital Carry Charge Rate /kW (e) (5) Present Value of Revenue Requirements (6) Annuity Factor Adjustment for Inflation ** 0.04866 (7) Present Value of Revenue Requirements Adjusted for Inflation (5)*(6) (8) Marginal Capital Carrying Charge Rate (7)/(1)/kW (2019 \$) (9) First Year Revenue Requirement (1)*(8) (f) (10) Present Value at 6.44% for 0 years (g) (11) Present Value of Average Annual Fuel Savings /kW (12) Annual Avoided Capacity Cost /kW (10)-(11) (h) (13) Adjusted for 15% Reserve Margin /kW (i) (12)*1.15 (14) Plus \$xx.xx/kW Fixed O & M (2019 \$) /kW (j) (13)+xx.xx (k) (15) Adjusted for losses (14)/0.9674 /kW (16) NET ANNUAL AVOIDED CAPACITY COST \$52.02 /kW (17) Net Winter On-Peak Avoided Capacity Cost (TOD PURCHASE) 0.00602 \$/kWh (16)*0.2340*100/2023 (18) Net Summer On-Peak Avoided Capacity Cost (TOD PURCHASE) (16)*0.7660*100/1022 0.03900 \$/kWh (19) Net Annual On-Peak Avoided Capacity Cost (16)*100/3045 0.01709 \$/kWh (20) Net Winter Avoided Capacity Cost Averaged Over All Winter Hours (PURCHASE & SALE BILLING) 0.00209 \$/kWh (16)*0.2340*100/5832 (21) Net Summer Avoided Capacity Cost 0.01361 \$/kWh Averaged Over All Summer Hours (PURCHASE & SALE BILLING) (16)*0.7660*100/2928 (22) Net Annual Avoided Capacity Cost Average Over All Hours 0.00594 \$/kWh (16)*100/8760 Note: The ** AC = $k*(r-j)*(1+j)^{(t-1)}*[1/(1-(1+j)^n/(1+r)^n)]$ Where AC = Annual Charge in year t t = Year (=1) K = Total Present Value Cost of Original Investment r = Discount Rate (Overall Marginal Cost of Capital) (6.44%) j = Inflation Rate Net of Technology Progress (2.77%) n = Expected Service Life of Investment (40 Years)

(I) Summer Percent:

(m) Winter Percent:

Total:

(n) O & M

5 of 6 5. Schedule G

76.60%

23.40%

100.00%

PROTECTED DATA ENDS]

Docket No. E999/PR-19-9 Revised Filing Attachment B Page 14 of 14

Minnesota Public Utilities Commission

DOCKET NO. E999/PR-19-9

Reporting Period: January 1 - December 31, 2019

Cogeneration and Small Power Production Tariff

Utility: Xcel Energy

Minn. Rules 7835.1100 Schedule H: Wholesale Power Rates

Special Rule for Non-Generating Utilities: Schedule H must list the rates at which a non-generating utility purchases energy and capacity. If the non-generating utility has more than one wholesale supplier, schedule H must list the rates of that supplier from which purchases may first be avoided. If the non-generating utility with more than one wholesale supplier also chooses to file schedules A and B, the data on schedules A and B must be obtained from that supplier from which purchases may first be avoided. Please use the space below to include these rates.

NOT APPLICABLE FOR XCEL ENERGY

6 of 6 6. Schedule H

Docket No. E999/PR-19-9 Revised Filing Attachment C

Final

MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2

EXCESS GENERATION-AVERAGE RETAIL UTILITY ENERGY SERVICE RATE CODE A50

Section No. 9 25th Revised Sheet No. 2

AVAILABILITY

This service corresponds to Minn. R. 7835.4012 and Minn. R. 7835.4013 (Average Retail Energy Rate) and to Paragraph 3.a of the Uniform Statewide Contract for Cogeneration and Small Power Production. Available to any qualifying facility (QF) of less than 40 kW AC capacity who receives non-time of day retail electric service from Company and offsets energy delivered by Company. The A50 Rate Code applies to the extent the energy delivered by the customer exceeds that supplied by the Company during the monthly billing period, and the rates below are for that net excess generation.

RATE Metering Charge per Month Single Phase Three Phase	Production Meter Installed \$3.15 \$6.40	No Production Meter Installed \$1.68 \$2.58	
Payment per kWh for Energy Delivered to Company in Excess of Energy Used	Oct-May	Jun-Sep	
With Retail Non-Demand Metered Service	\$0.12328	\$0.13222	R
With Retail Demand Metered Service	\$0.06812	\$0.06939	R

TERMS AND CONDITIONS OF SERVICE

- 1. Energy used by customer in excess of energy delivered by the QF at the same site during the same billing period shall be billed in accordance with the appropriate non-time of day retail electric rate.
- 2. For demand metered General Service customers, the entire kW demand supplied by the Company at the same site during the same billing period shall be billed to the customer according to the appropriate general service demand charge rate.
- 3. Interconnection charges will be assessed by the Company on an individual basis for all costs associated with addition to or modification of Company facilities to accommodate the QF. The net interconnection charge is the responsibility of the QF.
- 4. The voltage and phase of customer's generator must be consistent with existing service and approved by the Company.
- 5. The customer must maintain a power factor as close to unity as possible or as specified in the "Power Factor" provision of the "Distributed Generation Interconnection Requirements" section of the Section 10 tariff.

Date Filed: 01-02-19 By: Christopher B. Clark Effective Date: 04-01-19

President, Northern States Power Company, a Minnesota corporation

SALE TO COMPANY AFTER CUSTOMER SELF-USE	Section No. 9	9
RATE CODE A51, A52	24th Revised Sheet No. 3	3

AVAILABILITY

This service corresponds to Minn. R. 7835.4012, .4014 (Simultaneous Purchase and Sale Billing Rate) and .4015 (Time-of-Day Purchase Rates) and to Paragraphs 3.b., 3.c., 4.a and 4.b of the Uniform Statewide Contract for Cogeneration and Small Power Production. Available to any qualifying facility (QF) customer of less than 1,000 kW AC capacity. The energy payment rates below apply to the energy which the customer exports to the Company after any self-use by the customer.

RATE	Production Meter	No Production
Metering Charge per Month	Installed	Meter Installed
Single Phase	\$5.50	\$2.58
Three Phase	\$8.00	\$6.76

Where the customer receives non-time of day retail electric service, the following Rate Code applies.

Payment Schedule for Energy Delivered to Company (A51)	Oct-May	<u>Jun-Sep</u>	
Energy Payment per kWh	\$0.02405	\$0.02309	R
Capacity Payment for Firm Power per kWh	\$0.00209	\$0.01361	R

Where the customer receives time of day retail electric service, the following Rate Code applies.

Payment Schedule for Energy Delivered to Company (A52)	Oct-May	<u>Jun-Sep</u>	
On Peak Energy Payment per kWh	\$0.02941	\$0.03194	R
Off Peak Energy Payment per kWh	\$0.02117	\$0.01847	R
Capacity Payment for Firm Power per On Peak kWh	\$0.00602	\$0.03900	R

DETERMINATION OF FIRM POWER

The customer will have supplied firm power if during the billing period an on peak capacity factor of at least 65% was achieved. The calculation of the on peak capacity factor will be as follows: the average on peak period metered capacity delivered to the Company for the on peak period of the billing period divided by the greatest 15 minute metered capacity delivered for the on peak period of the same billing period expressed in percent and rounded to the nearest whole percent. If the percent calculated is 65 or greater, capacity payment will be made. If the percent calculated is less than 65, capacity payment will not be made.

(Continued on Sheet No. 9-3.1)

Date Filed: 01-02-19 By: Christopher B. Clark Effective Date: 04-01-19

President, Northern States Power Company, a Minnesota corporation

MONTHLY NET METERING	Section No.	9
RATE CODE A53, A54	23rd Revised Sheet No.	4

AVAILABILITY

This service corresponds to Minn. R. 7835.4012, .4014 (Simultaneous Purchase and Sale Billing Rate) and .4015 (Time-of-Day Purchase Rates) and to Paragraphs 3.b., 3.c., 4.a. and 4.b. of the Uniform Statewide Contract for Cogeneration and Small Power Production. Available to any qualifying facility (QF) customer of less than 1,000 kW AC capacity. The energy payment rates below apply to the extent the energy delivered by the customer exceeds that supplied by the Company during the monthly billing period, and the rates below are for that net excess generation.

RATE	Production Meter	No Production
Metering Charge per Month	Installed	Meter Installed
Single Phase	\$5.50	\$2.58
Three Phase	\$8.00	\$6.76

Where the customer receives non-time of day retail electric service, the following Rate Code applies.

Payment Schedule for Energy Delivered to Company in Excess		
of Energy Used (A53)	Oct-May	<u>Jun-Sep</u>
Energy Payment per kWh	\$0.02405	\$0.02309

Energy Payment per kWh \$0.02309
Capacity Payment for Firm Power per kWh \$0.00209 \$0.01361

Where the customer receives time of day retail electric service, the following Rate Code applies.

Payment Schedule for Energy Delivered to Company in Excess			
of Energy Used (A54)	Oct-May	Jun-Sep	
On Peak Energy Payment per kWh	\$0.02941	\$0.03194	R
Off Peak Energy Payment per kWh	\$0.02117	\$0.01847	R
Capacity Payment for Firm Power per On Peak kWh	\$0.00602	\$0.03900	R

R

R

DETERMINATION OF FIRM POWER

The customer will have supplied firm power if during the billing period an on peak capacity factor of at least 65% was achieved. The calculation of the on peak capacity factor will be as follows: the average on peak period metered capacity delivered to the Company for the on peak period of the billing period divided by the greatest 15 minute metered capacity delivered for the on peak period of the same billing period expressed in percent and rounded to the nearest whole percent. If the percent calculated is 65 or greater, capacity payment will be made. If the percent calculated is less than 65, capacity payment will not be made.

(Continued on Sheet No. 9-4.1)

Date Filed: 01-02-19 By: Christopher B. Clark Effective Date: 04-01-19

President, Northern States Power Company, a Minnesota corporation

ANNUAL NET METERING (KWH BANKING OPTION) RATE CODE A55, A56

Section No. 9
3rd Revised Sheet No. 4.2

Availability

This service corresponds to Minn. R. 7835.4012, .4014 (Simultaneous Purchase and Sale Billing Rate), .4015 (Time-of-Day Purchase Rates), and .4017 (Net Metered Facility; Bill Credits), and to Paragraphs 5.a, 5.b, and 5.c of the Uniform Statewide Contract for Cogeneration and Small Power Production. Available to a qualifying facility (QF) or Net Metered Facility (NMF) customer who elects to be compensated for net input into the utility's system in the form of a kilowatt-hour credit on the customer's bill for that customer's account, subject to the following conditions:

- A. The customer is not receiving a value of solar rate under Minnesota Statutes, section 216B.164, subdivision 10:
- B. The customer is interconnected with the Company; and
- C. The customer has at least 40 kilowatt AC capacity but less than 1,000 kilowatt AC capacity.

Metering Charge per Month

Single Phase \$5.50 Three Phase \$8.00

The Company compensates the customer, in the form of an energy payment, for the bank balance for kWh credits annually at the rate set forth below.

Energy Payment per kWh for Customers on non-time of day Service Tariffs (A55)		<u>Annual</u> \$0.02370	R
Time of Day Service Customers (A56) On Peak Energy Payment per kWh Off Peak Energy Payment per kWh		<u>Annual</u> \$0.03034 \$0.02018	R R
Capacity Payment for Firm Power where customer receives non-time of day retail electric service per kWh time of day retail electric service per on-peak kWh	<u>Oct-May</u> \$0.00209 \$0.00602	<u>Jun-Sep</u> \$0.01361 \$0.03900	R R

Determination of Firm Power

The customer will have supplied firm power if during the billing period an on peak capacity factor of at least 65% was achieved. The calculation of the on peak capacity factor will be as follows: the average on peak period metered capacity delivered to the Company for the on peak period of the billing period divided by the greatest 15 minute metered capacity delivered for the on peak period of the same billing period expressed in percent and rounded to the nearest whole percent. If the percent calculated is 65 or greater, capacity payment will be made. If the percent calculated is less than 65, capacity payment will not be made.

(Continued on Sheet No. 9-4.3)

Date Filed: 01-02-19 By: Christopher B. Clark Effective Date: 04-01-19

President, Northern States Power Company, a Minnesota corporation

CERTIFICATE OF SERVICE

- I, Paget Pengelly, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.
 - <u>xx</u> by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota;
 - xx electronic filing

Docket No. E999/PR-19-9

Dated this 10th day of September 2019

/s/

Paget Pengelly

Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Allen	michael.allen@allenergysol ar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_19-9_Official
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St Denver, CO 80204-8020	Electronic Service	No	OFF_SL_19-9_Official
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-9_Official
Sara	Baldwin Auck	sarab@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156 Latham, NY 12110	Electronic Service	No	OFF_SL_19-9_Official
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-9_Official
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-9_Official
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-9_Official
Kathleen M.	Brennan	kmb@mcgrannshea.com	McGrann Shea Carnival, Straughn & Lamb, Chartered	800 Nicollet Mall Ste 2600 Minneapolis, MN 554027035	Electronic Service	No	OFF_SL_19-9_Official
Mark B.	Bring	mbring@otpco.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-9_Official
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-9_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_19-9_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_19-9_Official
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_19-9_Official
Kenneth A.	Colburn	kcolburn@symbioticstrategi es.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_19-9_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-9_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-9_Official
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Solar	14333 Orchard Rd. Minnetonka, MN 55345	Electronic Service	No	OFF_SL_19-9_Official
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_19-9_Official
James	Darabi	james.darabi@solarfarm.co m	Solar Farm, LLC	2355 Fairview Ave #101 St. Paul, MN 55113	Electronic Service	No	OFF_SL_19-9_Official
James	Denniston	james.r.denniston@xcelen ergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-9_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristen	Eide Tollefson	healingsystems69@gmail.c om	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_19-9_Official
Betsy	Engelking	betsy@geronimoenergy.co m	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_19-9_Official
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-9_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_19-9_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_19-9_Official
Nathan	Franzen	nathan@geronimoenergy.c om	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_19-9_Official
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development IIc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_19-9_Official
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-9_Official
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_19-9_Official
Timothy	Gulden	timothy.gulden@yahoo.co m	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	OFF_SL_19-9_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tony	Hainault	anthony.hainault@co.henn epin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_19-9_Official
Kimberly	Hellwig	kimberly.hellwig@stoel.co m	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-9_Official
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_19-9_Official
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_19-9_Official
John S.	Jaffray	jjaffray@jjrpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_19-9_Official
Brian	Jeremiason	bjeremiason@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.	205 W. Hwy. 14 Tyler, MN 56178	Electronic Service	No	OFF_SL_19-9_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-9_Official
Michael	Kampmeyer	mkampmeyer@a-e- group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_19-9_Official
Kevin	Keene	kevin.keene@cummins.co		N/A	Electronic Service	No	OFF_SL_19-9_Official
Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave Ste 200 Lakeville, MN 55044	Paper Service	No	OFF_SL_19-9_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
3rad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_19-9_Official
Jon	Kramer	sundialjon@gmail.com	Sundial Solar	3209 W 76th St Edina, MN 55435	Electronic Service	No	OFF_SL_19-9_Official
Michael	Krause	michaelkrause61@yahoo.c om	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_19-9_Official
Jeffrey L.	Landsman	jlandsman@wheelerlaw.co m	Wheeler, Van Sickle & Anderson, S.C.	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_19-9_Official
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Wayzata, MN 55391	Electronic Service	No	OFF_SL_19-9_Official
Phillip	Lipetsky	greenenergyproductsllc@g mail.com	Green Energy Products	PO Box 108 Springfield, MN 56087	Electronic Service	No	OFF_SL_19-9_Official
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200 Minneapolis, MN 55420	Electronic Service	No	OFF_SL_19-9_Official
Dave	McNary	David.McNary@hennepin.u s	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_19-9_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_19-9_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-9_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-9_Official
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-9_Official
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-9_Official
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_19-9_Official
Wendi	Olson	wolson@otpco.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-9_Official
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_19-9_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_19-9_Official
Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-9_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary Beth	Peranteau	mperanteau@wheelerlaw.c om	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_19-9_Official
Mark	Rathbun	mrathbun@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-9_Official
Michael	Reinertson	michael.reinertson@avante nergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-9_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_19-9_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_19-9_Official
Richard	Savelkoul	rsavelkoul@martinsquires.c om	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-9_Official
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-9_Official
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_19-9_Official
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-9_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Trevor	Smith	trevor.smith@avantenergy.	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-9_Official
Beth H.	Soholt	bsoholt@windonthewires.or	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_19-9_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-9_Official
Thomas P.	Sweeney III	tom.sweeney@easycleane nergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_19-9_Official
Lynnette	Sweet	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-9_Official
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_19-9_Official
Sam	Villella	sdvillella@gmail.com		10534 Alamo Street NE Blaine, MN 55449	Electronic Service	No	OFF_SL_19-9_Official
Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind	618 2nd Ave SE Minneapolis, MN 55414	Electronic Service	No	OFF_SL_19-9_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_19-9_Official

First Name Last Name Email Company Name Address	Delivery Method	View Trade Secret	Service List Name
Thomas J. Zaremba TZaremba@wheelerlaw.co m WHEELER, VAN SICKLE 44 E. Mifflin Street, 101 Floor Madison, WI 53703	th Electronic Service	No	OFF_SL_19-9_Official