

August 24, 2021

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket Nos. E999/CI-16-521, E999/CI-01-1023

Dear Mr. Seuffert:

On July 16, 2001, the Minnesota Public Utilities Commission issued a *Notice of Comment Period* seeking comment on proposed changes identified reports by the Distributed Generation Workgroup related to:

- Group System Impact Study option for long interconnection queues or the capacity constrained feeders or substations;
- Interconnection queue management proposals, such as, Distributed Energy Resource (DER) capacity planning limits, feeder capacity reservations, and cost-sharing mechanisms for customers with small DER; and
- DER dispute resolution processes.

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources in this matter. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Rate Analyst Coordinator

SLP/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

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

I. BACKGROUND INFORMATION

In May 2021, the Distributed Generation Workgroup (DGWG) issued subgroup reports on several topics including Reporting, Interconnection Application Templates, Completeness Review, Queue Management, Cluster Study, System Impact Results Report and Objections, and an Emerging Technology Webinar.

On July 16, 2021, the Minnesota Public Service Commission (Commission) issued a *Notice of Comment Period* seeking comment on the proposals made in the DGWG subgroup reports.

The Commission's Notice sought comment on the following:

1. Do the suggested changes advance the purpose of interconnection standards outlined in Minn. Stat. §216B.1611 or the Minnesota Distributed Energy Resources Interconnection Process or Agreements (MN DIP/DIA)?
2. Do the DER dispute resolution process clarifications comply with MN DIP Sec. 5.3?
3. Will the suggested changes improve the interconnection process for customers and for the utility, including reducing the time needed to approve interconnection applications?
4. Should the Commission require a specific utility or utilities to implement the changes or adopt the practices for all utilities in Minnesota?
5. Does Commission adoption require an update to the MN DIP/DIA?
6. Are there other issues or concerns related to this matter?

The Department offers the following summary of the applicable subgroup reports, and the Department's recommendations.

II. SUMMARY AND DEPARTMENT ANALYSIS

A. QUEUE MANAGEMENT

The Queue Subgroup focused its discussions on possible solutions to reducing the length of time a DG project to be reviewed in the interconnection application process. The interconnection process is contained in the Minnesota Distributed Interconnection Resources Process (MN DIP) which details the process under which Xcel reviews interconnection applications for completeness and development of interconnection agreement (IA). Depending on the size and complexity of the DG project, projects may

be eligible for a simplified process, a fast-track process, or a study process. The volume of DG applications in Xcel's territory has resulted in even some small behind-the-meter projects being placed "on hold", as the project awaits determination of interconnection of a project ahead of it in the queue. The MN DIP states:

The Area EPS Operator shall maintain a single, administrative queue and may manage the queue by geographical region (i.e. feeder, substation, etc.) This administrative queue shall be used to address Interconnection Customer inquiries about the queue process. If the Area EPS Operator and the Interconnection Customer(s) agree, Interconnection Applications may be studied in clusters for the purpose of the system impact study; otherwise, they will be studied serially.¹

Xcel began reviewing DG projects 40 kW or less in parallel with projects ahead of them in the queue and has proposed similar parallel review for Fast Track projects no known capacity constraints at the location of the project. Interconnection costs are typically assigned to the first project in which the need is identified. Consequently, parallel rather than serial review of smaller DG projects raises the risk that the smaller DG project may get assigned interconnection costs that would otherwise be assigned to a larger project ahead of it in the queue. The Queue Subgroup indicated general support for the use of parallel review for projects 40 kW or less, but sought additional information on its effectiveness with projects less than 40 kW before proceeding with its use with Fast Track Projects.

The Queue Subgroup also considered ways to speed interconnection review in the study process when multiple projects were in the queue at a location. At present, the first project in the queue is studied while other projects behind the first are put on hold until an interconnection agreement for the first project is signed. Beginning system impact studies for projects further down the queue raises the risk that restudies will be necessary if earlier in queue projects drop out. Among the solutions considered were only using an accelerated process when a smaller number of projects were in queue on a feeder or requiring deposits to cover the potential restudy costs.

In addition to consideration of methods to speed up the review process, the Queue Subgroup considered methods to reserve capacity on a feeder for non-exporting projects. The proposals considered included eliminating consideration of the Daily Minimum Load (DML) in determining available capacity and reserving that capacity for smaller non-export systems. Alternatively, Xcel proposed to reserve 25 percent of the planning capacity on each feeder for customer-sited DG projects. Finally, the Queue Subgroup considered cost sharing mechanism for smaller projects.

¹ Xcel Tariff, Section 10, Sheet 180, 1.8.3

The Department supports the use of parallel review of smaller ≤ 40 kW DG projects. Before proceeding with use of a parallel review for Fast Track applications where no capacity constraint exists, the developers recommended additional tracking and reporting to include:

- Number of projects <40kW that failed initial screens, supplemental screens and required upgrades
 - Per quarter in the year before parallel screening was implemented;
 - Per quarter after parallel screening was implemented;
- Identify/tax (e.g. in SalesForce) applications that are screened in parallel.

The Department understands part of the concern is the potential for higher upgrade costs being assigned to a smaller project as a result of parallel processing than would have occurred had the project been reviewed in queue order. Xcel has committed to provide additional analysis on the potential impact to interconnection costs of switching to parallel processing.²

With respect to review of interconnection applications in the study phase, the Subgroup disagreed with the Xcel proposal to advance the timing of when it would begin a System Impact Study for the next project in the queue. Currently, projects behind the first project are on hold until the first project has a signed IA. At present, the Subgroup participants have not reached agreement on a solution. Over the past several months several complaints have been filed by developers concerned with time delays in the interconnection process. The result of the complaint process is to further delay the review process for projects further down the queue. The Department addresses steps for moving forward later in these comments.

At the present time, the Department does not support proposals to reserve capacity on feeders for smaller projects. Xcel has indicated that a significant number of DG projects are concentrated on a few feeders and substations. When capacity is already constrained, the Department does not expect reserving capacity for smaller projects will reduce the constraint, and where capacity is not constrained, reserving some for smaller projects appears unnecessary.

Finally, the Department is supportive of efforts to develop cost sharing for smaller projects, as well as for larger projects through the use of cluster studies.

B. CLUSTER STUDIES

Cluster studies represent an option for reviewing multiple interconnection applications at a particular location that may permit faster review than serial review process, and can provide a method for cost sharing among multiple projects when system upgrades are required. The Cluster Subgroup Report details possible methods for undertaking cluster studies, and reviews the experience in other states. Among the issues that need to be resolved in undertaking a cluster study, is the number of participants, whether participation is mandatory or voluntary, the circumstances under which a

² DGWG Subgroup Reports, page 42.

participant may drop out of the study and any consequences for doing so, and a methodology for cost sharing.

As a first step, IREC and Fresh Energy recommended Xcel be ordered to provide a full technical assessment of each of the capacity constrained locations that identifies the technical issues, details possible upgrades or other remedies for mitigating the constraint and estimated costs and timelines for implementing those solutions.

Minn. Stat. §216B.164 (c) requires that “subscribers must be retail customers of the public utility located in the same county or a county contiguous to where the facility is located.” In part, this statutory requirement results in the placement of CSGs in close proximity to larger communities with access to a larger group of potential subscribers. Short of a change to the statute, the issue of multiple CSGs seeking interconnection on a subset of Xcel’s feeders is not going to change, and a technical solution needs to be sought. As a result, the Department supports IREC and Fresh Energy’s recommendation for a full technical assessment of the capacity constrained locations, and recommends the Commission order the Company to provide such a study.

Once the technical assessment is provided, some parties recommended the Commission commence an investigation into the best solution for resolving congested areas using a notice and comment period. Parties indicated the Commission may consider directing the Department to utilize an internal distribution engineering expert or an external consultant to assist in evaluating the technical assessment. At present, the Department does not have an internal distribution engineering expert, and does not anticipate hiring one in the near future.³ As such, the Department would need to issue a RFP to obtain an external consultant. If the Commission chooses to go forward with a proceeding to determine the best solution for resolving constrained capacity at various locations that it provide sufficient time and details of the scope of the proceeding to allow the Department ample time to issue an RFP and acquire an expert with the skills to address the Commission concerns. In the Department’s view, the Commission does not need to make this determination now, but rather the Department raises it simply to put the issue in front of the Commission for a future determination.

Xcel proposed a cluster study pilot program in which it would undertake a cluster study methodology. The Company proposes that the pilot will focus on use of the cluster study in locations without known capacity constraints, and continue the current serial review of applications where there is a known capacity constraint.

³ The Department notes its experience with the Independent Engineer process in place prior to the implementation of the MN DIP. The Independent Engineer (IE) Process was used for handling interconnection disputes. Under the process, the Department issued an RFQ to solicit engineers able to investigate and issue findings on interconnection disputes. If parties disagreed with the findings of the IE, they could appeal the decision to the Commission. In practice, the Department had difficulty finding independent engineers without conflicts of interest with either utilities or solar developers. By the end of the process only a single engineer was available to handle disputes. The Department is aware that the remaining IE has subsequently worked for a number of solar developers, and would have a conflict of interest.

The Department supports the idea of a cluster study pilot program but disagrees with Xcel's proposal to limit use of the methodology to locations without capacity constraints. Capacity constraints often result in significant upgrade costs in order to go forward with a project. Use of a cluster study could provide CSG developers with a path for individual projects sharing the cost of the interconnection upgrades. The Department understands that California and Massachusetts both utilize cluster studies for both capacity constrained and non-constrained locations. The Department recommends that any pilot program undertaken to evaluate the usefulness of cluster studies include studies at both constrained and unconstrained locations. Proceeding with a cluster study at an unconstrained location may be reasonable to undertake at the same time a technical assessment of capacity constrained locations in order to move the process along, but the Department recommends that a cluster study involving a capacity constrained location also be undertaken once the technical assessment has been evaluated.

C. HOW TO PROCEED

While both the subgroup and DGWG discussions have been useful in identifying and detailing issues pertinent to each subgroup, the Department does not expect ongoing workgroup discussions to resolve many of these issues and recommends the Commission tee the issues up for a determination. As occurs routinely in rate cases before an ALJ, the Department recommends the Commission require parties to develop an issues matrix with details on the issues both disputed and resolved, decision points, a delineation of each party's recommendations, and where in the record to date some discussion of the issues has occurred.. The development of such an issues matrix could encourage parties to narrow the issues in front of the Commission by resolving some of the disagreements, as well as provide the Commission with a map for resolving the disputed issues.

For smaller 40 kW and under DG projects, the Department is aware of the following issues:

1. Whether to review FastTrack applications in parallel when there are no known capacity constraints on the feeder;
2. Appropriate cost sharing for smaller DG projects.
3. Other issues

For Study Phase projects, the following issues remain in dispute:

1. how the clusters should be created on an on-going basis;
2. whether the studies should be mandatory;
3. the scope and timeline for a cluster study, including how many studies will be performed;
4. Determination of when and the consequences of a project dropping out of the study;
5. How cluster study costs and interconnection costs are allocated among participants; and
6. If cluster studies are determined to be the appropriate path forward how is the transition from the current serial process to a cluster study undertaken.
7. The parameters of a Pilot program including many of the issues reflected above;
8. Other issues.

The Department is most concerned with achieving some resolution to the disputed issues in order to reduce the length of time projects are on hold, and to continue to move forward with the installation of DG.

D. DISPUTE RESOLUTION

In its February 18, 2021 Order in Docket No. E,G002/M-12-383, the Commission ordered Xcel to work with stakeholders to develop a process for resolving solar installation issues before the problems rose to the level a customer complaint under its Quality of Service Plan (QSP).⁴ Following a series of stakeholder meetings on June 1, 2021, Xcel submitted a proposal to revise its dispute resolution process for DG. The Company's a two-track process with goal of resolving non-technical issues within 10 days, and continuing use of the MN DIP Section 5.3.3. dispute resolution process for technical issues. In either case, if the dispute remains unresolved following efforts by both parties to reach agreement, the complaint could be raised with the Commission's Consumer Affairs Office and would then be reflected in the Company's QSP.

The Department supports the proposal to address non-technical issues under the shortened 10-day timeframe proposed by the Company. In the Department's opinion many, if not most of the recent formal technical complaints filed by parties regarding interconnection have been due to delays in the interconnection application review process, and in the estimated cost of interconnections. The filing of individual complaints while a reasonable venue for a developer to undertake also exacerbates delays for the projects later in queue. The Department recommends the Commission move forward with decisions to resolve the broader issues around application review, use of cluster studies, and cost sharing arrangements, particularly for applications where capacity is constrained with the goal of resolving these technical concerns. At this time, the Department does not have additional recommendations to the dispute resolution process beyond the resolution of a number of the broader issues affecting interconnection.

E.

F. APPLICATION OF ANY CHANGES TO ALL UTILITIES

Currently, Xcel is the utility with the greatest number of DG installations, and the most variety in those installations (e.g. Rooftop solar, Community Solar Gardens). As such, the Department recommends the Commission focus on resolving the issues most pertinent to Xcel, before addressing their broader applicability to other utilities.

⁴ *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service Quality Tariffs.*

III. SUMMARY OF DEPARTMENT RECOMMENDATIONS

The Department's recommendations are as follows:

1. For DG projects of 40 kW or less, the Department recommends the Commission order Xcel to report the following information in its quarterly reporting:
 - Number of projects <40kW that failed initial screens, supplemental screens and required upgrades
 - Per quarter in the year before parallel screening was implemented;
 - Per quarter after parallel screening was implemented;
 - Identify/tag (e.g. in Salesforce) applications that are screened in parallel.
 - Additional analysis on the potential impact to interconnection costs of switching to parallel processing.
2. Reject capacity reservation proposals;
3. Order Xcel to provide within 60 days of the date of the order a full technical assessment of each of the capacity constrained locations that identifies the technical issues, details possible upgrades or other remedies for mitigating the constraint and estimated costs and timelines for implementing those solutions;
4. Direct the Queue and Cluster Studies Subgroups to develop an issues matrix detailing all resolved and unresolved issues, a description of party positions and recommended decision options along with any references to record documentation within 60 days of the Commission's Order; and
5. Approve Xcel's Dispute Resolution process for non-technical issues.

/ja

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, 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
Comments**

Docket No. E999/CI-16-521 and E999/CI-01-1023

Dated this 24th day of **August 2021**

/s/Sharon Ferguson

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Cheryl	Dietrich	cheryl.dietrich@nexteraenergy.com	NextEra Energy Resources, LLC	700 Universe Blvd E1W/JB Juno Beach, FL 33408	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robin	Doege	Rdoege@stearnslectric.org	Stearns Electric Association	PO Box 40 Melrose, MN 56352-0040	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kristin	Dolan	kdolan@meeker.coop	Meeker Cooperative Light & Power Assn	1725 US Hwy 12 E. Ste 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Renee	Doyle		Doyle Electric Inc.	PO Box 295 Amboy, MN 56010	Paper Service	No	OFF_SL_16-521_Official Service List PUC
John R.	Dunlop, P.E.	JDunlop@RESMinn.com	Renewable Energy Services	Suite 300 448 Morgan Ave. S. Minneapolis, MN 554052030	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_16-521_Official Service List PUC
Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192 Park Rapids, MN 56470	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kornbaum	Frank	fkornbaum@mnpower.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mike	Franklin	mfranklin@mncef.com	MN Conservative Energy Forum	235 E 6th St Fifth Floor St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Katelyn	Frye	kfrye@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Nitzan	Goldberger	n.goldberger@energystorage.org	Energy Storage Association	1800 M Street NW Suite 400S Washington, DC 20036	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sarah	Groebner	sgroebner@redwoodelectr c.com	Redwood Electric Cooperative	60 Pine St Clements, MN 56224	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Timothy	Gulden	timothy.gulden@yahoo.co m	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Cody	Gustafson	cgustafson@mnpower.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tom	Guttormson	Tom.Guttormson@connexu senenergy.com	Connexus Energy	14601 Ramsey Blvd Ramsey, MN 55303	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
James	Haler	jhaler@southcentralelectr .com	South Central Electric Association	71176 Tiell Dr P. O. Box 150 St. James, MN 56081	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Donald	Hanson	dfhanson@ieee.org	Solar Photovoltaic Systems	P. O. Box 44579 Eden Prairie, MN 55344	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John	Harlander	john.c.harlander@xcelener gy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Adam	Heinen	aheinen@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jared	Hendricks	jared.hendricks@owatonna utilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ryan	Hentges	ryanh@mvec.net	Minnesota Valley Electric Cooperative	125 Minnesota Valley Electric Dr Jordan, MN 55352	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative	60 Pine Street Clements, MN 56224	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Dean	Hunter	Dean.Hunter@state.mn.us	Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Chris	Jarosch	chris@carrcreekelectricservice.com	Carr Creek Electric Service, LLC	209 Sommers Street North Hudson, WI 54016	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Jeremiason	bjeremiason@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.	205 W. Hwy. 14 Tyler, MN 56178	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jack	Kluempke	Jack.Kluempke@state.mn. us	Department of Commerce	85 7th Place East Suite 600 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Corrina	Kumpe	ckumpe@mysunshare.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Carl	Linville	clinville@raponline.org	Regulatory Assistance Project	50 State Street Suite #3 Montpelier, VT 05602	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
William	Lovelace	wlovelace@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156 Latham, NY 12110-1156	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.	10710 Town Square Dr NE Ste 201 Minneapolis, MN 55449	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Susan	Mackenzie	susan.mackenzie@state.mn.us	Public Utilities Commission	121 7th Place E Ste 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200 Minneapolis, MN 55420	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 Saint Paul, MN 55104-1850	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tim	Mergen	tmergen@meecker.coop	Meecker Cooperative Light And Power	1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Murtaugh	mmurtaugh@fmcs.coop	Freeborn-Mower Cooperative Services	2501 Main Street East Albert Lea, MN 56007	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Michael	Noble	noble@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc	P.O. Box 639 Tyler, MN 561780639	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cezar	Panait	Cezar.Panait@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company	PO Box 496 215 S. Cascade St. Fergus Falls, MN 565370496	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Susan	Peirce	Susan.Peirce@state.mn.us	Department of Commerce	85 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jeff M	Peters	jeff.peters@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, MN 57109-8920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Wess	Pfaff	wes.pfaff@mrenergy.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Donna	Pickard	dpickardgsss@gmail.com	Genie Solar Support Services	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Elizabeth	Psihos	elizabeth.psihos@idealener gies.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Patrick	Quinn	pquinn@GREnergy.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gregory	Randa	granda@lakecountrypower.com	Lake Country Power	26039 Bear Ridge Drive Cohasset, MN 55721	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michelle	Rebholz	michelle.rebholz@state.mn.us	Public Utilities Commission	Suite 350121 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC	3363 Republic Ave Saint Louis Park, MN 55426	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_16-521_Official Service List PUC
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_16-521_Official Service List PUC
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC	1401 South Broadway Pelican Rapids, MN 56572	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kenric	Scheevel	Kenric.scheevel@dairylandpower.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, Wisconsin 54602	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-521_Official Service List PUC
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power	1725 US Highway 12 E Suite 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Assn.	24386 State Hwy. 4, PO Box 529 Sleepy Eye, Minnesota 56085	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies	5810 Nicollet Ave Minneapolis, Minnesota 55419	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robyn	Sonstegard	robyn.s@northstarelectric.coop	North Star Electric Cooperative, Inc.	PO BOX 719 Baudette, MN 56623	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric	22636 US Highway 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Paper Service	No	OFF_SL_16-521_Official Service List PUC
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Bryant	Tauer	btauer@whe.org	Wright-Hennepin	6800 Electric Dr Rockford, MN 55373	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Emma Marshall	Torres	emarshall-torres@convergentep.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pat	Treseler	pat.jclaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jeff	Triplett	triplettj@powersystem.org	MREA	10710 Town Square Dr NW St 201 Minneapolis, MN 55449	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric	22636 US Hwy. 59 P.O. Box 788 Worthington, MN 56187-0788	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Craig	Turner	cturner@dakotaelectric.com	Dakota Electric Association	4300 - 220th Street West Farmington, MN 550249583	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jenny	Unknown	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities	208 S Walnut Ave PO BOX 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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John	Williamson	John.Williamson@state.mn.us	Minnesota Department of Labor and Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Danielle	Winner	danielle.winner@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Thomas J.	Zaremba	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive P.O. Box 88920 Sioux Falls, SD 57108-8920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC