

NOTICE OF STAKEHOLDER MEETING

Issued: December 4, 2020

**In the Matter of Dakota Electric Association’s 2019 Integrated Distribution System Plan
In the Matter of Minnesota Power’s 2019 Integrated Distribution Plan
In the Matter of Otter Tail Power’s 2019 Integrated Distribution Plan
In the Matter of Xcel Energy’s Integrated Distribution Plan and Advanced Grid Intelligence and Security Certification Request**

PUC Docket Number(s): E111/M-19-674
E015/M-19-684
E017/M-19-693
E002/M-19-666

The Commission will host a virtual Integrated Distribution Planning (IDP) Stakeholder Meeting on **Friday, January 8, 2021** from **2:00 – 4:00pm Central**. To receive log in information, please register on the State of Minnesota’s WebEx Meeting platform at <https://bit.ly/2UWBT8d>.

The IDP Stakeholder Meeting intends to “engage representatives from each of the rate-regulated utilities and stakeholders to review and discuss the Commission’s IDP orders for the next round of IDP reports to help ensure that data included in future IDPs is efficiently gathered and presented.”¹

Attached to this Notice:

Attachment 1: Draft Agenda for January 8, 2021 IDP Stakeholder Meeting
Attachments 2-5: Commission staff red-line of IDP filing requirement changes and additional requests by Commission Orders:

Attachment 2	Dakota Electric Association
Attachment 3	Minnesota Power
Attachment 4	Otter Tail Power
Attachment 5	Xcel Energy

¹ ORDER ACCEPTING INTEGRATED DISTRIBUTION PLAN AND MODIFYING FILING REQUIREMENTS (November 2, 2020), Ordering Paragraph 5, p. 9.

Background

As of November 2, 2020, the Commission has accepted at least one Integrated Distribution Plan (IDP) from each of Minnesota’s four rate-regulated utilities (Dakota Electric Association, Minnesota Power, Otter Tail Power, and Xcel Energy.) All four rate-regulated utilities will file their next IDP in November 2021.

The Commission’s November 2, 2020 Order delegated authority to the Executive Secretary to convene a process to engage representatives from each of the rate-regulated utilities and stakeholders to review and discuss the Commission’s IDP orders for the next round of IDP reports to help ensure that data included in future IDPs is efficiently gathered and presented. This Notice establishes that process as a Stakeholder Meeting with the attached draft Agenda (Attachment 1). If necessary, additional process may be determined later.

The Commission adopted the initial IDP filing requirements for each rate-regulated utility as follows:

Order Issued	Docket No.	Utility’s IDP filing requirements
August 30, 2018	E002/CI-18-251	Xcel Energy
February 20, 2019	E111/CI-18-255 E015/CI-18-254 E017/CI-18-253	Dakota Electric Association Minnesota Power Otter Tail Power

In the following Orders, the Commission made additional modification to the IDP filing requirements:

Order Issued	Docket No.	Utility’s IDP filing requirements
July 16, 2019	E002/CI-18-251	Xcel Energy
May 27, 2020	E015/M-19-684	Minnesota Power
July 23, 2020	E002/M-19-666	Xcel Energy
September 9, 2020	E017/M-19-693	Otter Tail Power
November 2, 2020	E111/M-19-674	Dakota Electric Association*
*Minor correction to all rate-regulated utility’s IDPs was included.		

Attachment 2 - 5 to the Notice are Commission staff red-lines capturing the revisions to the initial IDP filing requirements for each rate-regulated utility.

Filing Requirements: Utilities, telecommunications carriers, official parties, and state agencies are **required** to file documents using the Commission’s electronic filing system (eFiling). All parties, participants and interested persons are encouraged to use eFiling: mn.gov/puc, select *eFiling*, and follow the prompts.

Full Case Record: See all documents filed in this docket via the Commission’s website at mn.gov/puc, select *Search eDockets*, enter the year (19) and the docket number (*e.g. 674, 684, 693, 666*), select *Search*.

Subscribe to receive email notification when new documents are filed in this docket at mn.gov/puc, select *Subscribe*, or click [HERE](#) and follow the prompts.

Questions about this docket or Commission process and procedure? Contact Commission staff, Michelle Rosier, at michelle.rosier@state.mn.us or 651-201-2212.

Change your mailing preferences: Email docketing.puc@state.mn.us or call Leesa Norton at 651-201-2246.

To request this document in another format such as large print or audio, call 651-296-0406 (voice). Consumers with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email consumer.puc@state.mn.us for assistance.

Integrated Distribution Planning Stakeholder Meeting

Friday, January 8th

2:00-4:00pm Central

Webex Meeting

Register: <https://bit.ly/2UWBT8d>

Objective: Review and discuss the Commission’s IDP orders for the next round of IDP reports to help ensure that data included in future IDPs is efficiently gathered and presented.

DRAFT AGENDA

<i>Time</i>	<i>Topic</i>
2:00	Introduction and Agenda Overview
2:10	Discussion on Initial IDP Filing Requirements – How specific data is being used and consideration of the effort/cost to report
3:00	Review and Discuss New IDP Filing Requirements or information requested by Order
3:30	How IDPs are used by stakeholders and utilities
3:55	Wrap up and Next Steps

If you have a sub-topic you would like to present or get feedback on, please contact Commission Staff, Michelle Rosier, michelle.rosier@state.mn.us or 651-201-2212, no later than **Monday, December 21st COB.**



MINNESOTA INTEGRATED DISTRIBUTION PLANNING REQUIREMENTS
For Dakota Electric Association
Docket E111/CI-18-255

Planning Objectives: The Commission is facilitating comprehensive, coordinated, transparent, integrated distribution plans to:

- Maintain and enhance the safety, security, reliability, and resilience of the electricity grid, at fair and reasonable costs, consistent with the state’s energy policies;
• Enable greater customer engagement, empowerment, and options for energy services;
• Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies; and,
• Ensure optimized utilization of electricity grid assets and resources to minimize total system costs; and,
• Provide the Commission with the information necessary to understand Dakota Electric Association’s short-term and long-term distribution system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value.

Commission review of annual-distribution system plans isare not meant to preclude flexibility for Dakota Electric Association (Dakota Electric) to respond to dynamic changes and on-going necessary system improvements to the distribution system; nor is it a prudency determination of any proposed system modifications or investments.

Commented [RM(1)]: Nov 2, 2020 Order (19-674), paragraph 4

For filing requirements which Dakota Electric claims is not yet practicable or is currently cost-prohibitive to provide, Dakota Electric shall indicate for each requirement:

1. Why the Company has claimed the information is not yet practicable or is currently cost-prohibitive;
2. How the information could be obtained, at what estimated cost, and timeframe;
3. What the benefits or limitations of filing the data in future reports as related to achieving the planning objectives;
4. If the information cannot be provided in future reports, what information in the alternative could be provided and how it would achieve the planning objectives.

Commented [RM(2)]: Nov. 2, 2020 Order (19-674)
2. Dakota Electric shall discuss in future filings how the IDP meets the Commission’s Planning Objectives, including:
a. Analysis of how the information in the IDP relates to each Planning Objective,
b. The location in the IDP,
c. Analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives, and
d. Suggestions as to any refinements to the IDP filing requirements that would enhance Dakota Electric’s ability to meet the Planning Objectives

Distribution System Plan Process

1. Filing Date: Require Dakota Electric to file biennially with the Commission beginning on November 1, 2019 an Integrated Distribution Plan (MN-IDP or IDP) for the 10-year period following the submittal. The Commission will either accept or reject a distribution system plan by June 1 (to the extent practicable) of the following year based upon the plan content and conformance with the filing requirements and Planning Objectives listed above.

2. Stakeholder Meeting(s): Dakota Electric should hold at least one stakeholder meeting prior to the November 1 filing of the Company's MN-IDP to obtain input from the public. The stakeholder meeting should occur in a manner timely enough to ensure input can be incorporated into the November 1 MN-IDP filing as deemed appropriate by the utility.

At a minimum, Dakota Electric should seek to solicit input from stakeholders on the following MN-IDP topics: (1) the load and distributed energy resources (DER) forecasts; (2) proposed 5-year distribution system investments, (3) anticipated capabilities of system investments and customer benefits derived from proposed actions in the next 5-years; including, consistency with the Commission's Planning Objectives (see above), and (4) any other relevant areas proposed in the MN-IDP.

Following the November 1 filing, the Commission will issue a notice of comment period. If deemed appropriate by staff, an additional stakeholder meeting may be held in combination with the comment period to solicit input.

3. Filing Requirements: For purposes of these requirements, DER is defined as "supply and demand side resources that can be used throughout an electric distribution system to meet energy and reliability needs of customers; can be installed on either the customer or utility side of the electric meter."¹ This definition for this filing may include, but is not limited to: distributed generation, energy storage, electric vehicles (EV), demand side management, and energy efficiency (EE).²

A. Baseline Distribution System and Financial Data

System Data

1. Modeling software currently used and planned software deployments
2. Percentage of substations and feeders with monitoring and control capabilities, planned additions
3. A summary of existing system visibility and measurement (feeder-level and time interval) and planned visibility improvements; include information on percentage of system with each level of visibility (ex. max/min, daytime/nighttime, monthly/daily reads, automated/manual)
4. Number of customer meters with AMI/smart meters and those without, planned AMI investments, and overview of functionality available
5. Discussion of how Dakota Electric Association approaches distribution system planning in consideration of and coordination with Great River Energy's integrated resource plan, and any planned modifications or planned changes to the existing

¹ See *Minnesota Staff Grid Modernization Report, March 2016*.

² ICF Report, *Integrated Distribution Planning*, August 2016, prepared for Minnesota Public Utilities Commission, Docket No. E999/C115-556, available online: See [eDockets ID: 20169-124836-01](#).

process to improve coordination and integration between the two plans from Dakota Electric Association's perspective.

6. Discussion of how DER is considered in load forecasting and any expected changes in load forecasting methodology
7. Discussion if and how IEEE Std. 1547-2018³ impacts distribution system planning considerations (e.g. opportunities and constraints related to interoperability and advanced inverter functionality)
8. Distribution system annual loss percentage for the prior year (average of 12 monthly loss percentages)
9. The maximum hourly coincident load (kW) for the distribution system as measured at the interface between the transmission and distribution system. This may be calculated using SCADA data or interval metered data or other non-billing metering / monitoring systems
10. Total distribution substation capacity in kVA
11. Total distribution transformer capacity in kVA, if different from total distribution substation capacity and the reason for the difference.
12. Total miles of overhead distribution wire
13. Total miles of underground distribution wire
14. Total number of distribution customers
15. Total costs spent on DER generation installation in the prior year. These costs should be broken down by category (including application review, responding to inquiries, metering, testing, make ready, etc).
16. Total charges to customers/member installers for DER generation installations, in the prior year. These costs should be broken down by category in which they were incurred (including application, fees, metering, make ready, etc.)
17. Total nameplate kW of DER generation system which completed interconnection to the system in the prior year, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
18. Total number of DER generation systems which completed interconnection to the system in the prior year, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
19. Total number and nameplate kW of existing DER systems interconnected to the distribution grid as of time of filing, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
20. Total number and nameplate kW of queued DER systems as of time of filing, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
21. Total number of electric vehicles in service territory
22. Total number and capacity of public electric vehicle charging stations
23. Number of units and MW/MWh ratings of battery storage
24. MWh saving and peak demand reductions from EE program spending in previous year
25. Amount of controllable demand (in both MW and as a percentage of system peak)

³ IEEE Standard 1547-2018, published April 6, 2018.

Financial Data

26. Historical distribution system spending for the past 5-years, in each category:
- a. Age-Related Replacements and Asset Renewal
 - b. System Expansion or Upgrades for Capacity
 - c. System Expansion or Upgrades for Reliability and Power Quality
 - d. New Customer Projects and New Revenue
 - e. Grid Modernization and Pilot Projects
 - f. Projects related to local (or other) government-requirements (road-relocations, etc.)
 - g. Metering
 - h. Other

The Company may provide in the IDP any 2019 or earlier data in the following categories:

- a. age-related replacements and asset renewal,
 - b. system capacity expansion (capacity driven),
 - c. system capacity expansion (reliability driven),
 - d. projects to support new members (including metering, transformers and wires),
 - e. system projects driven by governmental projects (road moves),
 - f. grid modernization (advanced technologies)
27. All non-Dakota Electric investments in distribution system upgrades (e.g. those required as a condition of interconnection) by subset (e.g. CSG, customer-sited, PPA and other) and location (i.e. feeder or substation).
28. Projected distribution system spending for 5-years into the future for the categories listed above, itemizing any non-traditional distribution projects
29. Planned distribution capital projects, including drivers for the project, timeline for improvement, and summary of anticipated changes in historic spending. Driver categories should include:
- a. Age-Related Replacements and Asset Renewal
 - b. System Expansion or Upgrades for Capacity
 - c. System Expansion or Upgrades for Reliability and Power Quality
 - d. New Customer Projects and New Revenue
 - e. Grid Modernization and Pilot Projects
 - f. Projects related to local (or other) government-requirements
 - g. Metering
 - h. Other
30. Provide any available cost benefit analysis in which the company evaluated a non-traditional distribution system solution to either a capital or operating upgrade or replacement

DER Deployment

31. Current DER deployment by type, size, and geographic dispersion (as useful for planning purposes; such as, by planning areas, service/work center areas, cities, etc.)

32. Information on areas of existing or forecasted high DER penetration. Include definition and rationale for what the Company considers “high” DER penetration.
33. Information on areas with existing or forecasted abnormal voltage or frequency issues that may benefit from the utilization of advanced inverter technology; provide information describing experiences where DER installations have caused operational challenges: such as, power quality, voltage or system overload issues.

B. Preliminary Hosting Capacity Data

1. Provide an excel spreadsheet (or other equivalent format) by feeder of either daytime minimum load (daily, if available) or, if daytime minimum load is not available, peak load (time granularity should be specified)

C. Distributed Energy Resource Scenario Analysis

1. In order to understand the potential impacts of faster-than-anticipated DER adoption, define and develop conceptual base-case, medium, and high scenarios regarding increased DER deployment on the distribution system. Scenarios should reflect a reasonable mix of individual DER adoption and aggregated or bundled DER service types, dispersed geographically across the Dakota Electric distribution system in the locations Dakota Electric would reasonably anticipate seeing DER growth take place first.
2. Include information on methodologies used to develop the low, medium, and high scenarios, including the DER adoption rates (if different from the minimum 10% and 25% levels), geographic deployment assumptions, expected DER load profiles (for both individual and bundled installations), and any other relevant assumptions factored into the scenario discussion. Indicate whether or not these methodologies and inputs are consistent with Integrated Resource Plan inputs.
3. Provide a discussion of the processes and tools that would be necessary to accommodate the specified levels of DER integration, including whether existing processes and tools would be sufficient. Provide a discussion of the system impacts and benefits that may arise from increased DER adoption, potential barriers to DER integration, and the types of system upgrades that may be necessary to accommodate the DER at the listed penetration levels.
4. Include information on anticipated impacts from FERC Order 841⁴ (Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators) and a discussion of potential impacts from the related FERC Docket RM18-9-000 (Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators)

D. Long-Term Distribution System Modernization and Infrastructure Investment Plan

⁴ Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators, 162 FERC ¶61,127 (February 28, 2018)

1. Dakota Electric shall provide a 5-year Action Plan as part of a 10-year long-term plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures scenarios, hosting capacity/daytime minimum load data, and non-wires alternatives analysis. The 5-year Action Plan should include a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (topics and categories listed above). Dakota Electric should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum:

- i. Overview of investment plan: scope, timing, and cost recovery mechanism
- ii. Grid Architecture: Description of steps planned to modernize the utility's grid and tools to help understand the complex interactions that exist in the present and possible future grid scenarios and what utility and customer benefits that could or will arise.⁵
- iii. Alternatives analysis of investment proposal: objectives intended with a project, general grid modernization investments considered, alternative cost and functionality analysis (both for the utility and the customer), implementation order options, and considerations made in pursuit of short-term investments. The analysis should be sufficient enough to justify and explain the investment.
- iv. System interoperability and communications strategy
- v. Costs and plans associated with obtaining system data (EE load shapes, photovoltaic output profiles with and without battery storage, capacity impacts of demand response combined with EE, EV charging profiles, etc.)
- vi. Interplay of investment with other utility programs (effects on existing utility programs such as demand response, efficiency projects, etc.)
- vii. Customer anticipated benefit and cost
- viii. Customer data and grid data management plan (how it is planned to be used and/or shared with customers and/or third parties)
- ix. Plans to manage rate or bill impacts, if any
- x. Impacts to net present value of system costs (in net present value revenue requirements/megawatt/hour or megawatt)
- xi. For each grid modernization project in its 5-year Action Plan, Dakota Electric should provide a cost-benefit analysis based on the best information it has at the time and include a discussion of nonquantifiable benefits. Dakota Electric Association shall provide all information to support its analysis.
- xii. Status of any existing pilots or potential for new opportunities for grid modernization pilots

Commented [RM(3)]: Nov. 2, 2020 Order, paragraph 3

2. In addition to the 5-year Action Plan, Dakota Electric shall provide a discussion of its vision for the planning, development, and use of the distribution system over the next 10 years. The 10-year Long-Term Plan discussion should address long-term assumptions

⁵ <https://gridarchitecture.pnnl.gov/>

(including load growth assumptions), the long-term impact of the 5-year Action Plan investments, what changes are necessary to incorporate DER into future planning processes based on the DER futures analysis, and any other types of changes that may need to take place in the tools and processes Dakota Electric is currently using.

E. Non-Wires (Non-Traditional) Alternatives Analysis

1. Dakota Electric shall provide a detailed discussion of all distribution system projects in the filing year and the subsequent five years that are anticipated to have a total cost of greater than two million dollars. For any forthcoming project or project in the filing year, which cost two million dollars or more, provide an analysis on how non-wires alternatives compare in terms of viability, price, and long-term value.

2. Dakota Electric shall provide information on the following:
 - i. Project types that would lend themselves to non-traditional solutions (i.e. load relief or reliability)
 - ii. A timeline that is needed to consider alternatives to any project types that would lend themselves to non-traditional solutions (allowing time for potential request for proposal, response, review, contracting and implementation)
 - iii. Cost threshold of any project type that would need to be met to have a non-traditional solution reviewed
 - iv. A discussion of a proposed screening process to be used internally to determine that non-traditional alternatives are considered prior to distribution system investments are made.



MINNESOTA INTEGRATED DISTRIBUTION PLANNING REQUIREMENTS
For Minnesota Power
Docket E015/CI-18-254

Planning Objectives: The Commission is facilitating comprehensive, coordinated, transparent, integrated distribution plans to:

- Maintain and enhance the safety, security, reliability, and resilience of the electricity grid, at fair and reasonable costs, consistent with the state’s energy policies;
• Enable greater customer engagement, empowerment, and options for energy services;
• Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies,
• Ensure optimized utilization of electricity grid assets and resources to minimize total system costs, and,
• Provide the Commission with the information necessary to understand Minnesota Power’s short-term and long-term distribution system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value.

Commission review of annual distribution system plans is not meant to preclude flexibility for Minnesota Power Company (Minnesota Power) to respond to dynamic changes and on-going necessary system improvements to the distribution system; nor is it a prudency determination of any proposed system modifications or investments.

Commented [RM(1)]: Nov. 2 Order (19-684), paragraph 4

For filing requirements which Minnesota Power claims is not yet practicable or is currently cost-prohibitive to provide, Minnesota Power shall indicate for each requirement:

1. Why the Company has claimed the information is not yet practicable or is currently cost-prohibitive;
2. How the information could be obtained, at what estimated cost, and timeframe;
3. What the benefits or limitations of filing the data in future reports as related to achieving the planning objectives;
4. If the information cannot be provided in future reports, what information in the alternative could be provided and how it would achieve the planning objectives.

Commented [RM(2)]: May 27, 2020 Order (19-684)
2. Minnesota Power shall discuss in future filings how the IDP meets the Commission’s IDP Planning Objectives, including:
a. Analysis of how the information in the IDP relates to each Planning Objective;
b. The location in the IDP;
c. Analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives; and
d. Suggestions as to any refinements to the IDP filing requirements that would enhance Minnesota Power’s ability to meet the Planning Objectives.

Distribution System Plan Process

1. Filing Date: Require Minnesota Power to file biennially with the Commission beginning on November 1, 2019 an Integrated Distribution Plan (MN-IDP or IDP) for the 10-year period following the submittal. The Commission will either accept or reject a distribution system plan by June 1 (to the extent practicable) of the following year based upon the plan content and conformance with the filing requirements and Planning Objectives listed above.

2. **Stakeholder Meeting(s):** Minnesota Power should hold at least one stakeholder meeting prior to the November 1 filing of the Company's MN-IDP to obtain input from the public. The stakeholder meeting should occur in a manner timely enough to ensure input can be incorporated into the November 1 MNIDP filing as deemed appropriate by the utility.

At a minimum, Minnesota Power should seek to solicit input from stakeholders on the following MN-IDP topics: (1) the load and distributed energy resources (DER) forecasts; (2) proposed 5-year distribution system investments, (3) anticipated capabilities of system investments and customer benefits derived from proposed actions in the next 5-years; including, consistency with the Commission's Planning Objectives (see above), and (4) any other relevant areas proposed in the MN-IDP.

Following the November 1 filing, the Commission will issue a notice of comment period. If deemed appropriate by staff, an additional stakeholder meeting may be held in combination with the comment period to solicit input.

3. **Filing Requirements:** For purposes of these requirements, DER is defined as "supply and demand side resources that can be used throughout an electric distribution system to meet energy and reliability needs of customers; can be installed on either the customer or utility side of the electric meter."¹ This definition for this filing may include, but is not limited to: distributed generation, energy storage, electric vehicles (EV), demand side management, and energy efficiency (EE).²

A. Baseline Distribution System and Financial Data

System Data

1. Modeling software currently used and planned software deployments
2. Percentage of substations and feeders with monitoring and control capabilities, planned additions
3. A summary of existing system visibility and measurement (feeder-level and time interval) and planned visibility improvements; include information on percentage of system with each level of visibility (ex. max/min, daytime/nighttime, monthly/daily reads, automated/manual)
4. Number of customer meters with AMI/smart meters and those without, planned AMI investments, and overview of functionality available
5. Discussion of how the distribution system planning is coordinated with the integrated resource plan (including how it informs and is informed by the IRP), and planned

¹ See *Minnesota Staff Grid Modernization Report, March 2016*.

² ICF Report, Integrated Distribution Planning, August 2016, prepared for Minnesota Public Utilities Commission, Docket No. E999/C15-556, available online: See [eDockets ID: 20169-124836-01](#).

- modifications or planned changes to the existing process to improve coordination and integration between the two plans
6. Discussion of how DER is considered in load forecasting and any expected changes in load forecasting methodology
 7. Discussion if and how IEEE Std. 1547-2018³ impacts distribution system planning considerations (e.g. opportunities and constraints related to interoperability and advanced inverter functionality)
 8. Distribution system annual loss percentage for the prior year (average of 12 monthly loss percentages)
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 18. Total number of DER generation systems which completed interconnection to the system in the prior year, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
 19. Total number and nameplate kW of existing DER systems interconnected to the distribution grid as of time of filing, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
 20. Total number and nameplate kW of queued DER systems as of time of filing, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
 21. Total number of electric vehicles in service territory
 22. Total number and capacity of public electric vehicle charging stations
 23. Number of units and MW/MWh ratings of battery storage
 24. MWh saving and peak demand reductions from EE program spending in previous year
 25. Amount of controllable demand (in both MW and as a percentage of system peak)

³ IEEE Standard 1547-2018, published April 6, 2018.

Financial Data

26. Historical distribution system spending for the past 5-years, in each category:
 - a. Age-Related Replacements and Asset Renewal
 - b. System Expansion or Upgrades for Capacity
 - c. System Expansion or Upgrades for Reliability and Power Quality
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 - f. Projects related to local (or other) government-requirements (road-relocations, etc.)
 - g. Metering
 - h. Other
27. All non-Minnesota Power investments in distribution system upgrades (e.g. those required as a condition of interconnection) by subset (e.g. CSG, customer-sited, PPA and other) and location (i.e. feeder or substation).
28. Projected distribution system spending for 5-years into the future for the categories listed above, itemizing any non-traditional distribution projects
29. Planned distribution capital projects, including drivers for the project, timeline for improvement, and summary of anticipated changes in historic spending. Driver categories should include:
 - a. Age-Related Replacements and Asset Renewal
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 - d. New Customer Projects and New Revenue
 - e. Grid Modernization and Pilot Projects
 - f. Projects related to local (or other) government-requirements
 - g. Metering
 - h. Other
30. Provide any available cost benefit analysis in which the company evaluated a non-traditional distribution system solution to either a capital or operating upgrade or replacement

DER Deployment

31. Current DER deployment by type, size, and geographic dispersion (as useful for planning purposes; such as, by planning areas, service/work center areas, cities, etc.)
32. Information on areas of existing or forecasted high DER penetration. Include definition and rationale for what the Company considers “high” DER penetration.
33. Information on areas with existing or forecasted abnormal voltage or frequency issues that may benefit from the utilization of advanced inverter technology; provide information describing experiences where DER installations have caused operational challenges: such as, power quality, voltage or system overload issues.

B. Preliminary Hosting Capacity Data

1. Provide an excel spreadsheet (or other equivalent format) by feeder of either daytime minimum load (daily, if available) or, if daytime minimum load is not available, peak load (time granularity should be specified)

C. Distributed Energy Resource Scenario Analysis

1. In order to understand the potential impacts of faster-than-anticipated DER adoption, define and develop conceptual base-case, medium, and high scenarios regarding increased DER deployment on the distribution system. Scenarios should reflect a reasonable mix of individual DER adoption and aggregated or bundled DER service types, dispersed geographically across the Minnesota Power distribution system in the locations Minnesota Power would reasonably anticipate seeing DER growth take place first.
2. Include information on methodologies used to develop the low, medium, and high scenarios, including the DER adoption rates (if different from the minimum 10% and 25% levels), geographic deployment assumptions, expected DER load profiles (for both individual and bundled installations), and any other relevant assumptions factored into the scenario discussion. Indicate whether or not these methodologies and inputs are consistent with Integrated Resource Plan inputs.
3. Provide a discussion of the processes and tools that would be necessary to accommodate the specified levels of DER integration, including whether existing processes and tools would be sufficient. Provide a discussion of the system impacts and benefits that may arise from increased DER adoption, potential barriers to DER integration, and the types of system upgrades that may be necessary to accommodate the DER at the listed penetration levels.
4. Include information on anticipated impacts from FERC Order 841⁴ (Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators) and a discussion of potential impacts from the related FERC Docket RM18-9-000 (Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators)

D. Long-Term Distribution System Modernization and Infrastructure Investment Plan

1. Minnesota Power shall provide a 5-year Action Plan as part of a 10-year long-term plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures scenarios, hosting capacity/daytime minimum load data, and non-wires alternatives analysis. The 5-year Action Plan should include a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (topics and categories listed above). Minnesota Power should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum:

⁴ Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators, 162 FERC ¶61,127 (February 28, 2018)

- a. Overview of investment plan: scope, timing, and cost recovery mechanism
- b. Grid Architecture: Description of steps planned to modernize the utility’s grid and tools to help understand the complex interactions that exist in the present and possible future grid scenarios and what utility and customer benefits that could or will arise.
- c. Alternatives analysis of investment proposal: objectives intended with a project, general grid modernization investments considered, alternative cost and functionality analysis (both for the utility and the customer), implementation order options, and considerations made in pursuit of short-term investments. The analysis should be sufficient enough to justify and explain the investment.
- d. System interoperability and communications strategy
- e. Costs and plans associated with obtaining system data (EE load shapes, photovoltaic output profiles with and without battery storage, capacity impacts of demand response combined with EE, EV charging profiles, etc.)
- f. Interplay of investment with other utility programs (effects on existing utility programs such as demand response, efficiency projects, etc.)
- g. Customer anticipated benefit and cost
- h. Customer data and grid data management plan (how it is planned to be used and/or shared with customers and/or third parties)
- i. Plans to manage rate or bill impacts, if any
- j. Impacts to net present value of system costs (in net present value revenue requirements/megawatt/hour or megawatt)
- k. For each grid modernization project in its 5-year Action Plan, Otter Tail Power should provide a cost-benefit analysis **based on the best information it has at the time and include a discussion of non-quantifiable benefits. Minnesota Power shall provide all information to support its analysis.**
- l. Status of any existing pilots or potential for new opportunities for grid modernization pilots

Commented [RM(3): May 27, 2020 Order (19-684), paragraph 3

- 2. In addition to the 5-year Action Plan, Minnesota Power shall provide a discussion of its vision for the planning, development, and use of the distribution system over the next 10 years. The 10-year Long-Term Plan discussion should address long-term assumptions (including load growth assumptions), the long-term impact of the 5-year Action Plan investments, what changes are necessary to incorporate DER into future planning processes based on the DER futures analysis, and any other types of changes that may need to take place in the tools and processes Minnesota Power is currently using.

E. Non-Wires (Non-Traditional) Alternatives Analysis

- 1. Minnesota Power shall provide a detailed discussion of all distribution system projects in the filing year and the subsequent five years that are anticipated to have a total cost of greater than two million dollars. For any forthcoming project or project in the filing year, which cost two million dollars or more, provide an analysis on how non-wires alternatives compare in terms of viability, price, and long-term value.

2. Minnesota Power shall provide information on the following:
 - a. Project types that would lend themselves to non-traditional solutions (i.e. load relief or reliability)
 - b. A timeline that is needed to consider alternatives to any project types that would lend themselves to non-traditional solutions (allowing time for potential request for proposal, response, review, contracting and implementation)
 - c. Cost threshold of any project type that would need to be met to have a non-traditional solution reviewed
 - d. A discussion of a proposed screening process to be used internally to determine that non-traditional alternatives are considered prior to distribution system investments are made.



MINNESOTA INTEGRATED DISTRIBUTION PLANNING REQUIREMENTS
For Otter Tail Power Company
Docket E017/CI-18-253

Planning Objectives: The Commission is facilitating comprehensive, coordinated, transparent, integrated distribution plans to:

- Maintain and enhance the safety, security, reliability, and resilience of the electricity grid, at fair and reasonable costs, consistent with the state’s energy policies;
• Enable greater customer engagement, empowerment, and options for energy services;
• Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies; and,
• Ensure optimized utilization of electricity grid assets and resources to minimize total system costs; and,
• Provide the Commission with the information necessary to understand Otter Tail Power’s short-term and long-term distribution system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value.

Commission review of annual-distribution system plans isare not meant to preclude flexibility for Otter Tail Power Company (Otter Tail) to respond to dynamic changes and on-going necessary system improvements to the distribution system; nor is it a prudency determination of any proposed system modifications or investments.

Commented [RM(1)]: Nov. 2 2020 Order (19-693), paragraph 4

For filing requirements which Otter Tail Power claims is not yet practicable or is currently cost-prohibitive to provide, Otter Tail Power shall indicate for each requirement:

1. Why the Company has claimed the information is not yet practicable or is currently cost-prohibitive;
2. How the information could be obtained, at what estimated cost, and timeframe;
3. What the benefits or limitations of filing the data in future reports as related to achieving the planning objectives;
4. If the information cannot be provided in future reports, what information in the alternative could be provided and how it would achieve the planning objectives.

Commented [RM(2)]: Sept 9, 2020 Order (19-693)
2. Otter Tail Power must discuss in future filings how the IDP meets the Commission’s Planning Objectives, including: a. An analysis of how the information presented in the IDP relates to each Planning Objective;
b. The location in the IDP;
c. Analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives; and
d. Suggestions as to any refinements to the IDP filing requirements that would enhance Xcel’s ability to meet the Planning Objectives.

Distribution System Plan Process

1. Filing Date: Require Otter Tail to file biennially with the Commission beginning on November 1, 2019 an Integrated Distribution Plan (MN-IDP or IDP) for the 10-year period following the submittal. The Commission will either accept or reject a distribution system plan by June 1 (to the extent practicable) of the following year based upon the plan content and conformance with the filing requirements and Planning Objectives listed above.

2. Stakeholder Meeting(s): Otter Tail should hold at least one stakeholder meeting prior to the November 1 filing of the Company's MN-IDP to obtain input from the public. The stakeholder meeting should occur in a manner timely enough to ensure input can be incorporated into the November 1 MN-IDP filing as deemed appropriate by the utility.

At a minimum, Otter Tail should seek to solicit input from stakeholders on the following MN-IDP topics: (1) the load and distributed energy resources (DER) forecasts; (2) proposed 5-year distribution system investments, (3) anticipated capabilities of system investments and customer benefits derived from proposed actions in the next 5-years; including, consistency with the Commission's Planning Objectives (see above), and (4) any other relevant areas proposed in the MN-IDP.

Following the November 1 filing, the Commission will issue a notice of comment period. If deemed appropriate by staff, an additional stakeholder meeting may be held in combination with the comment period to solicit input.

3. Filing Requirements: For purposes of these requirements, DER is defined as "supply and demand side resources that can be used throughout an electric distribution system to meet energy and reliability needs of customers; can be installed on either the customer or utility side of the electric meter."¹ This definition for this filing may include, but is not limited to: distributed generation, energy storage, electric vehicles (EV), demand side management, and energy efficiency (EE).²

A. Baseline Distribution System and Financial Data

System Data

1. Modeling software currently used and planned software deployments
2. Percentage of substations and feeders with monitoring and control capabilities, planned additions
3. A summary of existing system visibility and measurement (feeder-level and time interval) and planned visibility improvements; include information on percentage of system with each level of visibility (ex. max/min, daytime/nighttime, monthly/daily reads, automated/manual)
4. Number of customer meters with AMI/smart meters and those without, planned AMI investments, and overview of functionality available
5. Discussion of how the distribution system planning is coordinated with the integrated resource plan (including how it informs and is informed by the IRP), and planned modifications or planned changes to the existing process to improve coordination and integration between the two plans

¹ See *Minnesota Staff Grid Modernization Report, March 2016*.

² ICF Report, *Integrated Distribution Planning, August 2016*, prepared for Minnesota Public Utilities Commission, Docket No. E999/C115-556, available online: See [eDockets ID: 20169-124836-01](#).

6. Discussion of how DER is considered in load forecasting and any expected changes in load forecasting methodology
7. Discussion if and how IEEE Std. 1547-2018³ impacts distribution system planning considerations (e.g. opportunities and constraints related to interoperability and advanced inverter functionality)
8. Distribution system annual loss percentage for the prior year (average of 12 monthly loss percentages)
9. The maximum hourly coincident load (kW) for the distribution system as measured at the interface between the transmission and distribution system. This may be calculated using SCADA data or interval metered data or other non-billing metering / monitoring systems
10. Total distribution substation capacity in kVA
11. Total distribution transformer capacity in kVA, if different from total distribution substation capacity and the reason for the difference.
12. Total miles of overhead distribution wire
13. Total miles of underground distribution wire
14. Total number of distribution customers
15. Total costs spent on DER generation installation in the prior year. These costs should be broken down by category (including application review, responding to inquiries, metering, testing, make ready, etc).
16. Total charges to customers/member installers for DER generation installations, in the prior year. These costs should be broken down by category in which they were incurred (including application, fees, metering, make ready, etc.)
17. Total nameplate kW of DER generation system which completed interconnection to the system in the prior year, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
18. Total number of DER generation systems which completed interconnection to the system in the prior year, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
19. Total number and nameplate kW of existing DER systems interconnected to the distribution grid as of time of filing, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
20. Total number and nameplate kW of queued DER systems as of time of filing, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
21. Total number of electric vehicles in service territory
22. Total number and capacity of public electric vehicle charging stations
23. Number of units and MW/MWh ratings of battery storage
24. MWh saving and peak demand reductions from EE program spending in previous year
25. Amount of controllable demand (in both MW and as a percentage of system peak)

Financial Data

³ IEEE Standard 1547-2018, published April 6, 2018.

26. Historical distribution system spending for the past 5-years, in each category:
- a. Age-Related Replacements and Asset Renewal
 - b. System Expansion or Upgrades for Capacity
 - c. System Expansion or Upgrades for Reliability and Power Quality
 - d. New Customer Projects and New Revenue
 - e. Grid Modernization and Pilot Projects
 - f. Projects related to local (or other) government-requirements
 - g. Metering
 - h. Other

The Company may provide in the IDP any 2019 or earlier data in the following categories:

- a. New Load or Reliability
 - b. Replace
 - c. Relocate
 - d. Metering
 - e. Grid Modernization or Pilot Projects
27. All non-Otter Tail investments in distribution system upgrades (e.g. those required as a condition of interconnection) by subset (e.g. CSG, customer-sited, PPA and other) and location (i.e. feeder or substation).
28. Projected distribution system spending for 5-years into the future for the categories listed above, itemizing any non-traditional distribution projects
29. Planned distribution capital projects, including drivers for the project, timeline for improvement, and summary of anticipated changes in historic spending. Driver categories should include:
- a. Age-Related Replacements and Asset Renewal
 - b. System Expansion or Upgrades for Capacity
 - c. System Expansion or Upgrades for Reliability and Power Quality
 - d. New Customer Projects and New Revenue
 - e. Grid Modernization and Pilot Projects
 - f. Projects related to local (or other) government-requirements
 - g. Metering
 - h. Other
30. Provide any available cost benefit analysis in which the company evaluated a non-traditional distribution system solution to either a capital or operating upgrade or replacement

DER Deployment

31. Current DER deployment by type, size, and geographic dispersion (as useful for planning purposes; such as, by planning areas, service/work center areas, cities, etc.)
32. Information on areas of existing or forecasted high DER penetration. Include definition and rationale for what the Company considers “high” DER penetration.
33. Information on areas with existing or forecasted abnormal voltage or frequency issues that may benefit from the utilization of advanced inverter technology; provide information describing experiences where DER installations have caused operational challenges: such as, power quality, voltage or system overload issues.

B. Preliminary Hosting Capacity Data

1. Provide an excel spreadsheet (or other equivalent format) by feeder of either daytime minimum load (daily, if available) or, if daytime minimum load is not available, peak load (time granularity should be specified)

C. Distributed Energy Resource Scenario Analysis

1. In order to understand the potential impacts of faster-than-anticipated DER adoption, define and develop conceptual base-case, medium, and high scenarios regarding increased DER deployment on the distribution system. Scenarios should reflect a reasonable mix of individual DER adoption and aggregated or bundled DER service types, dispersed geographically across the Otter Tail distribution system in the locations Otter Tail would reasonably anticipate seeing DER growth take place first.
2. Include information on methodologies used to develop the low, medium, and high scenarios, including the DER adoption rates (if different from the minimum 10% and 25% levels), geographic deployment assumptions, expected DER load profiles (for both individual and bundled installations), and any other relevant assumptions factored into the scenario discussion. Indicate whether or not these methodologies and inputs are consistent with Integrated Resource Plan inputs.
3. Provide a discussion of the processes and tools that would be necessary to accommodate the specified levels of DER integration, including whether existing processes and tools would be sufficient. Provide a discussion of the system impacts and benefits that may arise from increased DER adoption, potential barriers to DER integration, and the types of system upgrades that may be necessary to accommodate the DER at the listed penetration levels.
4. Include information on anticipated impacts from FERC Order 841⁴ (Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators) and a discussion of potential impacts from the related FERC Docket RM18-9-000 (Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators)

D. Long-Term Distribution System Modernization and Infrastructure Investment Plan

1. Otter Tail shall provide a 5-year Action Plan as part of a 10-year long term plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures scenarios, hosting capacity analysis/daytime minimum load data, and non-wires alternatives analysis. [Merged with 3.D.2 per Sept. 9, 2020 Order]

⁴ Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators, 162 FERC ¶61,127 (February 28, 2018)

2. Otter Tail Power shall provide a 5-year Action Plan as part of a 10-year long-term plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures analysis, hosting capacity analysis, and non-wires alternatives analysis. The 5-year

Commented [RM(3)]: Sept 9, 2020 Order (19-693), paragraph 4

Action Plan should include a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (expanding on topics and categories listed above). Otter Tail should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum:

- i. Overview of investment plan: scope, timing, and cost recovery mechanism
- ii. Grid Architecture: Description of steps planned to modernize the utility’s grid and tools to help understand the complex interactions that exist in the present and possible future grid scenarios and what utility and customer benefits that could or will arise.⁵
- iii. Alternatives analysis of investment proposal: objectives intended with a project, general grid modernization investments considered, alternative cost and functionality analysis (both for the utility and the customer), implementation order options, and considerations made in pursuit of short-term investments. The analysis should be sufficient enough to justify and explain the investment.
- iv. System interoperability and communications strategy
- v. Costs and plans associated with obtaining system data (EE load shapes, photovoltaic output profiles with and without battery storage, capacity impacts of demand response combined with EE, EV charging profiles, etc.)
- vi. Interplay of investment with other utility programs (effects on existing utility programs such as demand response, efficiency projects, etc.)
- vii. Customer anticipated benefit and cost
- viii. Customer data and grid data management plan (how it is planned to be used and/or shared with customers and/or third parties)
- ix. Plans to manage rate or bill impacts, if any
- x. Impacts to net present value of system costs (in net present value revenue requirements/megawatt/hour or megawatt)
- xi. For each grid modernization project in its 5-year Action Plan, Otter Tail Power should provide a cost-benefit analysis based on the best information it has at the time and include a discussion of non-quantifiable benefits. Otter Tail Power shall provide all information to support its analysis.

Commented [RM(4)]: Sept 9, 2020 Order (19-693), paragraph 3

Commented [RM(5R4)]: Sept 9, 2020 Order (19-693)
5. Future IDP filings should provide stakeholders and the Commission with more explicit information on cost-benefit conceptualization, methodologies, and/or calculations.

xii. Status of any existing pilots or potential for new opportunities for grid modernization pilots

3. In addition to the 5-year Action Plan, Otter Tail shall provide a discussion of its vision for the planning, development, and use of the distribution system over the next 10 years.

⁵ <https://gridarchitecture.pnnl.gov/>

The 10- year Long-Term Plan discussion should address long-term assumptions (including load growth assumptions), the long-term impact of the 5-year Action Plan investments, what changes are necessary to incorporate DER into future planning processes based on the DER futures analysis, and any other types of changes that may need to take place in the tools and processes Otter Tail is currently using.

E. Non-Wires (Non-Traditional) Alternatives Analysis

1. Otter Tail shall provide a detailed discussion of all distribution system projects in the filing year and the subsequent five years that are anticipated to have a total cost of greater than two million dollars. For any forthcoming project or project in the filing year, which cost two million dollars or more, provide an analysis on how non-wires alternatives compare in terms of viability, price, and long-term value.
2. Otter Tail shall provide information on the following:
 - i. Project types that would lend themselves to non-traditional solutions (i.e. load relief or reliability)
 - ii. A timeline that is needed to consider alternatives to any project types that would lend themselves to non-traditional solutions (allowing time for potential request for proposal, response, review, contracting and implementation)
 - iii. Cost threshold of any project type that would need to be met to have a non-traditional solution reviewed
 - iv. A discussion of a proposed screening process to be used internally to determine that non-traditional alternatives are considered prior to distribution system investments are made.



MINNESOTA INTEGRATED DISTRIBUTION PLANNING REQUIREMENTS
For Xcel Energy
Docket E002/CI-18-251

Red-lines incorporate July 16, 2019 Order (18-251) and November 2, 2020 Order (19-666)

Planning Objectives: The Commission is facilitating comprehensive, coordinated, transparent, integrated distribution plans to:

- Maintain and enhance the safety, security, reliability, and resilience of the electricity grid, at fair and reasonable costs, consistent with the state's energy policies;
Enable greater customer engagement, empowerment, and options for energy services;
Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies; and,
Ensure optimized utilization of electricity grid assets and resources to minimize total system costs.
Provide the Commission with the information necessary to understand Xcel's short-term and long-term distribution system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value.

Commission review of annual distribution system plans is not meant to preclude flexibility for Xcel to respond to dynamic changes and on-going necessary system improvements to the distribution system; nor is it a prudency determination of any proposed system modifications or investments.

Commented [RM(1)]: Nov. 2, 2020 Order (19-666), paragraph 4

For filing requirements which Xcel claims is not yet practicable or is currently cost-prohibitive to provide, Xcel shall indicate for each requirement:

- Why the Company has claimed the information is not yet practicable or is currently cost-prohibitive;
How the information could be obtained, at what estimated cost, and timeframe;
What the benefits or limitations of filing the data in future reports as related to achieving the planning objectives;
If the information cannot be provided in future reports, what information in the alternative could be provided and how it would achieve the planning objectives.

Commented [RM(2)]: July 16, 2019 Order (18-251):
5. Xcel shall discuss in future filings how the IDP meets the Commission's Planning Objectives, including:
A. An analysis of how the information presented in the IDP related to each Planning Objective,
B. The location in the IDP,
C. Analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives, and
D. Suggestions as to any refinements to the IDP filing requirements that would enhance Xcel's ability to meet the Planning Objectives

Distribution System Plan Process

- Filing Date: Require Xcel to file annually with the Commission beginning on November 1, 2018 an Integrated Distribution Plan (MN-IDP or IDP) for the 10-year period following the submittal. The Commission will either accept or reject a distribution system plan by June 1 (to the extent practicable) of the following year based upon the plan content and conformance with the filing requirements and Planning Objectives listed above. The

Commented [RM(3)]: July 23, 2020 Order (19-666):
2. Xcel must file Integrated Distribution Plans biennially going forward. The Company's next IDP must be filed no later than November 1, 2021.
3. Xcel must continue to file an annual update of baseline financial data and non-wires alternatives analysis.

plan will be reviewed and may be combined with the Biennial Distribution System Plan required by Minn. Stat. 216B.2425 and associated certification requests, as authorized in that docket (E002/M-17-776).

2. **Stakeholder Meeting(s):** Xcel should hold at least one stakeholder meeting prior to the November 1 filing of the Company’s MN-IDP to obtain input from the public. The stakeholder meeting should occur in a manner timely enough to ensure input can be incorporated into the November 1 MN-IDP filing as deemed appropriate by the utility.

Commented [RM(4): July 23, 2020 Order (19-666):
 5. Xcel must allow any interested person to participate in stakeholder engagement meetings regarding its IDP and HCA. 6. Xcel must engage stakeholders in further advancing the Company’s NWA Analysis, including, but not limited to, screening criteria, analysis methodology and assumptions, and NWA evaluation parameters.

At a minimum, Xcel should seek to solicit input from stakeholders on the following MN-IDP topics: (1) the load and distributed energy resources (DER) forecasts; (2) proposed 5-year distribution system investments, (3) anticipated capabilities of system investments and customer benefits derived from proposed actions in the next 5-years; including, consistency with the Commission’s Planning Objectives (see above), and (4) any other relevant areas proposed in the MN-IDP.

Following the November 1 filing, the Commission will issue a notice of comment period. If deemed appropriate by staff, an additional stakeholder meeting may be held in combination with the comment period to solicit input.

3. **Filing Requirements:** For purposes of these requirements, DER is defined as “supply and demand side resources that can be used throughout an electric distribution system to meet energy and reliability needs of customers; can be installed on either the customer or utility side of the electric meter.”¹ This definition for this filing may include, but is not limited to: distributed generation, energy storage, electric vehicles, demand side management, and energy efficiency.²

A. Baseline Distribution System and Financial Data

System Data

1. Modeling software currently used and planned software deployments
2. Percentage of substations and feeders with monitoring and control capabilities, planned additions
3. A summary of existing system visibility and measurement (feeder-level and time interval) and planned visibility improvements; include information on percentage of system with each level of visibility (ex. max/min, daytime/nighttime, monthly/daily reads, automated/manual)
4. Number of customer meters with AMI/smart meters and those without, planned AMI investments, and overview of functionality available
5. Discussion of how the distribution system planning is coordinated with the integrated

¹ See *Minnesota Staff Grid Modernization Report, March 2016*.

² ICF Report, *Integrated Distribution Planning, August 2016*, prepared for Minnesota Public Utilities Commission, Docket No. E999/CI15-556, available online: See [eDockets ID: 20169-124836-01](#).

- resource plan (including how it informs and is informed by the IRP), and planned modifications or planned changes to the existing process to improve coordination and integration between the two plans
6. Discussion of how DER is considered in load forecasting and any expected changes in load forecasting methodology
 7. Discussion if and how IEEE Std. 1547-2018³ impacts distribution system planning considerations (e.g. opportunities and constraints related to interoperability and advanced inverter functionality)
 8. Estimated distribution system annual loss percentage for the prior year
 9. For the portions of the system with SCADA capabilities, the maximum hourly coincident load (kW) for the distribution system as measured at the interface between the transmission and distribution system
 10. Total distribution substation capacity in kVA
 11. Total distribution transformer capacity in kVA
 12. Total miles of overhead distribution wire
 13. Total miles of underground distribution wire
 14. Total number of distribution premises
 15. Total costs spent on DER generation installation in the prior year. These costs should be broken down by category in which they were incurred (including application review, responding to inquiries, metering, testing, make ready, etc.).
 16. Total charges to customers/member installers for DER generation installations, in the prior year. These charges should be broken down by category in which they were incurred (including application, fees, metering, make ready, etc.)
 17. Total nameplate kW of DER generation system which completed interconnection to the system in the prior year, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
 18. Total number of DER generation systems which completed interconnection to the system in the prior year, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
 19. Total number and nameplate kW of existing DER systems interconnected to the distribution grid as of time of filing, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
 20. Total number and nameplate kW of queued DER systems as of time of filing, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)
 21. Total number of electric vehicles in service territory
 22. Total number and capacity of public electric vehicle charging stations
 23. Number of units and MW/MWh ratings of battery storage
 24. MWh saving and peak demand reductions from EE program spending in previous year
 25. Amount of controllable demand (in both MW and as a percentage of system peak)

Financial Data

³ IEEE Standard 1547-2018, published April 6, 2018.

26. Historical distribution system spending for the past 5-years, in each category:
- a. Age-Related Replacements and Asset Renewal
 - b. System Expansion or Upgrades for Capacity
 - c. System Expansion or Upgrades for Reliability and Power Quality
 - d. New Customer Projects and New Revenue
 - e. Grid Modernization and Pilot Projects
 - f. Projects related to local (or other) government-requirements
 - g. Metering
 - h. Other

The Company may provide in the IDP any 2018 or earlier data in the following rate case categories:

- a. Asset Health
- b. New Business
- c. Capacity
- d. Fleet, Tools, and Equipment
- e. Grid Modernization

For each category, provide a description of what items and investments are included.

27. All non-Xcel investments in distribution system upgrades (e.g. those required as a condition of interconnection) by subset (e.g. CSG, customer-sited, PPA and other) and location (i.e. feeder or substation).
28. Projected distribution system spending for 5-years into the future for the categories listed above, itemizing any non-traditional distribution projects
29. Planned distribution capital projects, including drivers for the project, timeline for improvement, summary of anticipated changes in historic spending. Driver categories should include:
- a. Age-Related Replacements and Asset Renewal
 - b. System Expansion or Upgrades for Capacity
 - c. System Expansion or Upgrades for Reliability and Power Quality
 - d. New Customer Projects and New Revenue
 - e. Grid Modernization and Pilot Projects
 - f. Projects related to local (or other) government-requirements
 - g. Metering
 - h. Other
30. Provide any available cost benefit analysis in which the company evaluated a non-traditional distribution system solution to either a capital or operating upgrade or replacement

Commented [RM(5)]: July 16, 2019 Order (18-251):
6. Xcel shall provide additional information on the Incremental Customer Investment Initiative and the System Expansion or Upgrade for Reliability and Power Quality increases beginning in 2021.

DER Deployment

- 31. Current DER deployment by type, size, and geographic dispersion (as useful for planning purposes; such as, by planning areas, service/work center areas, cities, etc.)
- 32. Information on areas of existing or forecasted high DER penetration. Include definition and rationale for what the Company considers “high” DER penetration.

33. Information on areas with existing or forecasted abnormal voltage or frequency issues that may benefit from the utilization of advanced inverter technology.

B. Hosting Capacity and Interconnection Requirements

1. Provide a narrative discussion on how the hosting capacity analysis filed annually on November 1 currently advances customer-sited DER (in particular PV and electric storage systems), how the Company anticipates the hosting capacity analysis (HCA) identifying interconnection points on the distribution system and necessary distribution upgrades to support the continued development of distributed generation resources⁴, and any other method in which Xcel anticipates customer benefit stemming from the annual HCA.

2. Describe the data sources and methodology used to complete the initial review screens outlined in the Minnesota DER Interconnection Process.⁵

C. Distributed Energy Resource Scenario Analysis

1. In order to understand the potential impacts of faster-than-anticipated DER adoption, define and develop conceptual base-case, medium, and high scenarios regarding increased DER deployment on Xcel’s system. Scenarios should reflect a reasonable mix of individual DER adoption and aggregated or bundled DER service types, dispersed geographically across the Xcel distribution system in the locations Xcel would reasonably anticipate seeing DER growth take place first.

2. Include information on methodologies used to develop the low, medium, and high scenarios, including the DER adoption rates (if different from the minimum 10% and 25% levels), geographic deployment assumptions, expected DER load profiles (for both individual and bundled installations), and any other relevant assumptions factored into the scenario discussion. Indicate whether or not these methodologies and inputs are consistent with Integrated Resource Plan inputs.

3. Provide a discussion of the processes and tools that would be necessary to accommodate the specified levels of DER integration, including whether existing processes and tools would be sufficient. Provide a discussion of the system impacts and benefits that may arise from increased DER adoption, potential barriers to DER integration, and the types of system upgrades that may be necessary to accommodate the DER at the listed penetration levels.

4. Include information on anticipated impacts from FERC Order 841⁶ (Electric Storage

Commented [RM(6)]: July 23, 2020 Order (19-666)
4. In the DER Scenario Analysis of future IDPs, Xcel must provide detail on how, in aggregate, the energy and climate goals of the Minnesota communities it serves, along with customer preference trends, are reflected. In particular, distribution generation planning should include consideration of local community generation goals and beneficial electrification.

Commented [RM(7R6)]: 7. Xcel shall make the development of enhanced load and DER forecasting capabilities, as well as, tracking and updating of actual feeder daytime minimum loads, a priority in 2019 and include a detailed description of its progress in the Company’s 2019 IDP.

⁴ Minn. Stat. 216B.2425, Subd. 8

⁵ Forthcoming Order, E999/CI-16-521, MN DIP 3.2 Initial Review

⁶ Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators, 162 FERC ¶61,127 (February 28, 2018)

Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators) and a discussion of potential impacts from the related FERC Docket RM18-9-000 (Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators)

D. Long-Term Distribution System Modernization and Infrastructure Investment Plan

1. ~~Xcel shall provide a 5-year Action Plan as part of a 10-year long-term plan for distribution system developments and investments in grid modernization based on internal business plans and the DER future scenarios. [Merged into 3.D.2 per July 16, 2019 Order, paragraph 4]~~
2. Xcel shall provide a 5-year Action Plan as part of a 10-year long term plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER future analysis, hosting capacity analysis, and non-wires alternatives analysis. The 5-year Action Plan should include a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (expanding on topics and categories listed above). Xcel should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum:
 - Overview of investment plan: scope, timing, and cost recovery mechanism
 - Grid Architecture: Description of steps planned to modernize the utility’s grid and tools to help understand the complex interactions that exist in the present and possible future grid scenarios and what utility and customer benefits that could or will arise.⁷
 - Alternatives analysis of investment proposal: objectives intended with a project, general grid modernization investments considered, alternative cost and functionality analysis (both for the utility and the customer), implementation order options, and considerations made in pursuit of short-term investments. The analysis should be sufficient enough to justify and explain the investment.
 - System interoperability and communications strategy
 - Costs and plans associated with obtaining system data (EE load shapes, PV output profiles with and without battery storage, capacity impacts of DR combined with EE, EV charging profiles, etc.)
 - Interplay of investment with other utility programs (effects on existing utility programs such as demand response, efficiency projects, etc.)
 - Customer anticipated benefit and cost
 - Customer data and grid data management plan (how it is planned to be used and/or shared with customers and/or third parties)
 - Plans to manage rate or bill impacts, if any

Commented [RM(8)]: July 16, 2019 Order (18-251), paragraph 4

Commented [RM(9)]: July 16, 2019 Order (18-251)
9. Xcel shall provide the results of its annual distribution investment risk-ranking and a description of the risk-ranking methodology, in future IDPs.

Commented [RM(10R9)]: July 16, 2019 Order (18-251)
10. Xcel shall provide information on forecasted net demand, capacity, forecasted percent load, risk score, planned investment spending, and investment summary information for feeders and substation transformers that have a risk score or planned investment in the budget cycle in future IDPs

Commented [RM(11R9)]: July 16, 2019 Order (18-251)
11. Xcel shall file any long-range distribution studies it had conducted in the time since the last IDP.

⁷ <https://gridarchitecture.pnnl.gov/>

- Impacts to net present value of system costs (in NPV RR/MWh or MW)
 - For each grid modernization project in its 5-year Action Plan, Xcel should provide a cost-benefit analysis based on the best information it has at the time and include a discussion of non-quantifiable benefits. Xcel shall provide all information used to support its analysis.
 - Status of any existing pilots or potential for new opportunities for grid modernization pilots
3. In addition to the 5-year Action Plan, Xcel shall provide a discussion of its vision for the planning, development, and use of the distribution system over the next 10 years. The 10-year Long-Term Plan discussion should address long-term assumptions (including load growth assumptions), the long-term impact of the 5-year Action Plan investments, what changes are necessary to incorporate DER into future planning processes based on the DER futures analysis, and any other types of changes that may need to take place in the tools and processes Xcel is currently using.

Commented [RM(12)]: July 16, 2019 Order (18-251), paragraph 3

Commented [RM(13)]: July 16, 2019 Order (18-251)
8. Xcel shall provide all information, analysis, and assumptions used to support the cost/benefit ratio for AMI, FAN and FLISR; and IVVO and CVR cost-benefit analysis as part of its 2019 IDP filing or other future filings.

E. Non-Wires (Non-Traditional) Alternatives Analysis

1. Xcel shall provide a detailed discussion of all distribution system projects in the filing year and the subsequent 5 years that are anticipated to have a total cost of greater than two million dollars. For any forthcoming project or project in the filing year, which cost two million dollars or more, provide an analysis on how non-wires alternatives compare in terms of viability, price, and long-term value.
2. Xcel shall provide information on the following:
 - Project types that would lend themselves to non-traditional solutions (i.e. load relief or reliability)
 - A timeline that is needed to consider alternatives to any project types that would lend themselves to non-traditional solutions (allowing time for potential request for proposal, response, review, contracting and implementation)
 - Cost threshold of any project type that would need to be met to have a non-traditional solution reviewed
 - A discussion of a proposed screening process to be used internally to determine that non-traditional alternatives are considered prior to distribution system investments are made.

CERTIFICATE OF SERVICE

I, Nancy Jia, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission NOTICE OF STAKEHOLDER MEETING

Docket Number

E-111/M-19-674

E-015/M-19-684

E-017/M-19-693

E-002/M-19-666

Dated this **4th** day of **December 2020**

/s/ Nancy Jia

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Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_19-684_M-19-684
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_19-684_M-19-684
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_19-684_M-19-684
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-684_M-19-684
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_19-684_M-19-684
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-684_M-19-684
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_19-684_M-19-684
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_19-684_M-19-684
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology	120 Tredegar Street Richmond, Virginia 23219	Electronic Service	No	OFF_SL_19-684_M-19-684
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-684_M-19-684
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_19-684_M-19-684
Patricia F	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.	180 N LaSalle St Ste 3700 Chicago, IL 60601	Electronic Service	No	OFF_SL_19-684_M-19-684
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-684_M-19-684
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-684_M-19-684
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_19-684_M-19-684
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No	OFF_SL_19-684_M-19-684
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
Ken	Smith	ken.smith@evergreenenergy.com	Ever Green Energy	305 Saint Peter St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-684_M-19-684
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_19-684_M-19-684
Benjamin	Stafford	bstafford@cleanenergyeconymn.org	Clean Energy Economy Minnesota	400 South 4th St Ste 401-202 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-684_M-19-684
Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_19-684_M-19-684
Tom	Stanton	tstanton@nrri.org	NRRI	1080 Carmack Road Columbus, OH 43210	Electronic Service	No	OFF_SL_19-684_M-19-684
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-684_M-19-684
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_19-684_M-19-684
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-684_M-19-684
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_19-684_M-19-684
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_19-684_M-19-684
Karen	Turnboom	karen.turnboom@versoco.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_19-684_M-19-684
Andrew	Twite	twite@fresh-energy.org	Fresh Energy	408 St. Peter Street, Ste. 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-684_M-19-684
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-684_M-19-684
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_19-684_M-19-684
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_19-684_M-19-684
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas J.	Zaremba	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_19-684_M-19-684
Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwy Court Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_19-693_M-19-693
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St Denver, CO 80204-8020	Electronic Service	No	OFF_SL_19-693_M-19-693
Ellen	Anderson	ellena@umn.edu	325 Learning and Environmental Sciences	1954 Buford Ave Saint Paul, MN 55108	Electronic Service	No	OFF_SL_19-693_M-19-693
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_19-693_M-19-693
Donna	Attanasio	dattanasio@law.gwu.edu	George Washington University	2000 H Street NW Washington, DC 20052	Electronic Service	No	OFF_SL_19-693_M-19-693
John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance	1313 5th St SE Ste 303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_19-693_M-19-693
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-693_M-19-693
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-693_M-19-693
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_19-693_M-19-693
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	OFF_SL_19-693_M-19-693

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-693_M-19-693
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-693_M-19-693
Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric	2411 W. Bridge St PO Box 485 Owatonna, MN 55060-0485	Electronic Service	No	OFF_SL_19-693_M-19-693
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-693_M-19-693
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-693_M-19-693
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_19-693_M-19-693
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_19-693_M-19-693
Jason	Burwen	j.burwen@energystorage.o rg	Energy Storage Association	1155 15th St NW, Ste 500 Washington, DC 20005	Electronic Service	No	OFF_SL_19-693_M-19-693
LORI	CLOBES	lclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_19-693_M-19-693
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_19-693_M-19-693

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_19-693_M-19-693
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_19-693_M-19-693
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-693_M-19-693
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-693_M-19-693
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-693_M-19-693
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Solar	14333 Orchard Rd. Minnetonka, MN 55345	Electronic Service	No	OFF_SL_19-693_M-19-693
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_19-693_M-19-693
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-693_M-19-693
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_19-693_M-19-693

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carlton	Doyle Fontaine	carlton.doyle.fontaine@senate.mn	MN Senate	75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul, MN 55155	Electronic Service	No	OFF_SL_19-693_M-19-693
Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No	OFF_SL_19-693_M-19-693
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_19-693_M-19-693
Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte	100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul, MN 55155	Electronic Service	No	OFF_SL_19-693_M-19-693
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-693_M-19-693
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_19-693_M-19-693
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_19-693_M-19-693
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_19-693_M-19-693
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_19-693_M-19-693

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-693_M-19-693
Hal	Galvin	halgalvin@comcast.net	Proectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_19-693_M-19-693
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-693_M-19-693
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-693_M-19-693
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_19-693_M-19-693
Timothy	Gulden	timothy.gulden@yahoo.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	OFF_SL_19-693_M-19-693
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_19-693_M-19-693
Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.	701 E. Cary Street Richmond, VA 23219	Electronic Service	No	OFF_SL_19-693_M-19-693
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_19-693_M-19-693
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_19-693_M-19-693

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_19-693_M-19-693
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-693_M-19-693
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_19-693_M-19-693
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_19-693_M-19-693
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_19-693_M-19-693
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_19-693_M-19-693
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-693_M-19-693
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_19-693_M-19-693
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_19-693_M-19-693

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_19-693_M-19-693
Max	Kieley	max.kieley@ag.state.mn.us	Office of the Attorney General-RUD	1400 Town Square Tower 445 Minnesota Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-693_M-19-693
Ted	Kjos	tkjos@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_19-693_M-19-693
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_19-693_M-19-693
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_19-693_M-19-693
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_19-693_M-19-693
Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_19-693_M-19-693
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_19-693_M-19-693
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-693_M-19-693

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Matthew	Lacey	Mlacey@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-693_M-19-693
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-693_M-19-693
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-693_M-19-693
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Wayzata, MN 55391	Electronic Service	No	OFF_SL_19-693_M-19-693
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_19-693_M-19-693
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-693_M-19-693
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-693_M-19-693
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-693_M-19-693
Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	OFF_SL_19-693_M-19-693

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gregg	Mast	gmast@cleanenergyeconomyymn.org	Clean Energy Economy Minnesota	4237 24th Avenue S Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-693_M-19-693
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_19-693_M-19-693
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_19-693_M-19-693
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-693_M-19-693
Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_19-693_M-19-693
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-693_M-19-693
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_19-693_M-19-693
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-693_M-19-693
Dale	Niezwaag	dniezwaag@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503	Electronic Service	No	OFF_SL_19-693_M-19-693
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-693_M-19-693

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_19-693_M-19-693
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_19-693_M-19-693
David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400 Burlington, MA 01803	Electronic Service	No	OFF_SL_19-693_M-19-693
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_19-693_M-19-693
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_19-693_M-19-693
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_19-693_M-19-693
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_19-693_M-19-693
Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-693_M-19-693

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_19-693_M-19-693
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-693_M-19-693
Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute	1000 Vermont Ave, Third Floor Washington, DC 20005	Electronic Service	No	OFF_SL_19-693_M-19-693
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_19-693_M-19-693
Gregory	Randa	granda@lakecountrypower.com	Lake Country Power	26039 Bear Ridge Drive Cohasset, MN 55721	Electronic Service	No	OFF_SL_19-693_M-19-693
Mark	Rathbun	mrathbun@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-693_M-19-693
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-693_M-19-693
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_19-693_M-19-693
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_19-693_M-19-693

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_19-693_M-19-693
Michael	Riewer	MRiewer@otpc.com	Otter Tail Power Company	PO Box 4496 Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_19-693_M-19-693
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_19-693_M-19-693
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-693_M-19-693
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_19-693_M-19-693
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-693_M-19-693
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_19-693_M-19-693
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_19-693_M-19-693
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_19-693_M-19-693

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology	120 Tredegar Street Richmond, Virginia 23219	Electronic Service	No	OFF_SL_19-693_M-19-693
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-693_M-19-693
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_19-693_M-19-693
Patricia F	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.	180 N LaSalle St Ste 3700 Chicago, IL 60601	Electronic Service	No	OFF_SL_19-693_M-19-693
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-693_M-19-693
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Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_19-693_M-19-693
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_19-693_M-19-693
Benjamin	Stafford	bstafford@cleanenergyeconymn.org	Clean Energy Economy Minnesota	400 South 4th St Ste 401-202 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-693_M-19-693
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Tom	Stanton	tstanton@nrri.org	NRRI	1080 Carmack Road Columbus, OH 43210	Electronic Service	No	OFF_SL_19-693_M-19-693
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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-693_M-19-693
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-693_M-19-693
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Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_19-693_M-19-693
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric	2411 W. Bridge St PO Box 485 Owatonna, MN 55060-0485	Electronic Service	No	OFF_SL_19-666_Official
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-666_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_19-666_Official
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John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_19-666_Official
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_19-666_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-666_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-666_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-666_Official
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Solar	14333 Orchard Rd. Minnetonka, MN 55345	Electronic Service	No	OFF_SL_19-666_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_19-666_Official
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-666_Official
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Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_19-666_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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