



414 Nicollet Mall  
Minneapolis, MN 55401

November 2, 2020

—Via Electronic Filing—

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: PETITION TO PUBLISH CERTAIN INFORMATION ABOUT APPLICATIONS IN  
THE INTERCONNECTION QUEUE  
COMMUNITY SOLAR GARDENS PROGRAM  
DOCKET NO. E002/M-13-867

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this Petition To Publish Certain Information about Applications in the Interconnection Queue that includes proposed tariff revisions to our Solar\*Rewards Community program in the above referenced docket. We are requesting an adjustment to the tariff to publish certain information about Community Solar Garden (CSG) applications in the interconnection queue.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact Jessica Peterson at [Jessica.k.peterson@xcelenergy.com](mailto:Jessica.k.peterson@xcelenergy.com) or (612)330-6850 if you have any questions regarding this filing.

Sincerely,

/s/

SHAWN M. WHITE  
MANAGER, DSM & RENEWABLE REGULATORY STRATEGY AND PLANNING

Enclosures  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY  
FOR APPROVAL OF ITS PROPOSED  
COMMUNITY SOLAR GARDENS  
PROGRAM

DOCKET NO. E002/M-13-867

**PETITION  
TO PUBLISH CERTAIN INFORMATION  
ABOUT APPLICATIONS IN THE  
INTERCONNECTION QUEUE**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits this Petition To Publish Certain Information about Applications in the Interconnection Queue that includes tariff revisions to our Solar\*Rewards Community program in the above referenced docket. We are requesting an adjustment to the tariff to publish certain information about Community Solar Garden (CSG) applications in the interconnection queue.

The Commission's October 22, 2020 Order Accepting Notification Proposal in this matter, at ordering point 2, required the CSG stakeholder workgroup to explore refining earlier notice of the window of planned outages so developers could plan for outages. This Petition seeks to implement one of the proposals on this issue addressed at the stakeholder workgroup by modifying our CSG tariff to allow us to publicly provide, by CSG interconnection application, information such as feeder name, currently expected in-service-date, and estimated interconnection costs. This type of information would help inform other existing CSGs on the same feeder on the timing and extent of upcoming interconnection work that could result in a planned outage. These tariff changes would also provide additional transparency into the queue and more readily allow CSG developers to reach out to each other to collaborate for purposes of study analysis or interconnection cost sharing.

We request the Commission approve these changes so we can publicly release these details that are currently treated as confidential information of the specific CSG applications.

## **I. SUMMARY OF FILING**

A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

## **II. SERVICE ON OTHER PARTIES**

Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on the Office of the Attorney General – Antitrust and Utilities Division. A summary of the filing has been served on all parties on the enclosed service list.

## **III. GENERAL FILING INFORMATION**

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

### **A. Name, Address, and Telephone Number of Utility**

Northern States Power Company, doing business as Xcel Energy  
414 Nicollet Mall  
Minneapolis, MN 55401  
(612) 330-5500

### **B. Name, Address, and Telephone Number of Utility Attorney**

James Denniston  
Assistant General Counsel  
Xcel Energy  
414 Nicollet Mall, 401 - 8<sup>th</sup> Floor  
Minneapolis, MN 55401  
612-215-4656

### **C. Date of Filing**

The date of this filing is November 2, 2020. The Company requests the Commission approve this Petition.

**D. Statute Controlling Schedule for Processing the Filing**

Minn. Stat. § 216B.16 subd. 1 requires a 60-day notice to the Commission of a proposed tariff change. Under the Commission’s rules, the proposed tariff change discussed in this Petition falls within the definition of a miscellaneous tariff filing under Minn. R. 7829.0100, subp. 11, since no determination of Xcel Energy’s general revenue requirement is necessary.

**E. Utility Employee Responsible for Filing**

Shawn White  
Manager, DSM Regulatory Strategy & Planning  
Xcel Energy  
414 Nicollet Mall, 401 – 6<sup>th</sup> Floor  
Minneapolis, MN 55401  
612-330-6096

**IV. MISCELLANEOUS INFORMATION**

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission’s official service list for this proceeding:

James Denniston  
Assistant General Counsel  
Xcel Energy  
414 Nicollet Mall, 401 – 8<sup>th</sup> Floor  
Minneapolis, MN 55401  
[James.R.Denniston@xcelenergy.com](mailto:James.R.Denniston@xcelenergy.com)

Crystal Syvertsen  
Regulatory Administrator  
Xcel Energy  
414 Nicollet Mall, 401 – 7<sup>th</sup> Floor  
Minneapolis, MN 55401  
[regulatory.records@xcelenergy.com](mailto:regulatory.records@xcelenergy.com)

Any information requests in this proceeding should be submitted to the Regulatory Records email address above.

**V. DESCRIPTION AND PURPOSE OF FILING**

**A. Background**

The Solar\*Rewards Community Program is based on Minn. Stat § 216B.1641 and provides customers the opportunity to subscribe to a third-party community solar garden in adjacent communities without physically installing their own solar PV

equipment. The Commission approved the Solar\*Rewards Community program on September 17, 2014, and the program was launched on December 12, 2014.<sup>1</sup>

The Solar\*Rewards Community program is implemented through the Company's Section 9 Tariff.<sup>2</sup> The CSG provisions in the Section 9 Tariff are program specific and supplement the Company's general interconnection rules and requirements for distributed generation under the Section 10 Tariff.<sup>3</sup>

The Company has traditionally kept developer name and specific details relating to interconnection applications – such as customer names and details about active interconnection applications – confidential to each interconnection applicant. This is also consistent with requests from stakeholders in the beginning of the program, when developers felt this information should be held private due to the competitive nature of developing community solar. Since this time, the Commission has required a public queue on the Company's website as part of the transition to the Minnesota Distributed Energy Resource Interconnection Process (MN DIP).

In connection with recent stakeholder discussions, both the CSG developers and the Company agreed publicly posting more information about each CSG application in the interconnection queue is appropriate and outweighs the initial privacy concerns discussed at the outset of the program. This is discussed below.

## **B. Purpose of Filing**

The purpose of this filing is to address the requirement in the Commission's October 13, 2020 Order Accepting Notification Proposal in this docket, ordering point 2, which stated in part: "The CSG stakeholder workgroup should also explore refining earlier notice of the window of planned outages so developers can plan for outages." In this Petition, following discussion at the CSG stakeholder workgroup, we propose changes to our CSG tariff to allow the public, including CSGs that are in operation, to gain further insight on when and to what extent the Company may be doing interconnection work for CSGs in the interconnection queue. We seek permission to publicly post information about all CSGs in the interconnection queue such as feeder name, currently expected in-service date (which may change over time), and indicative estimated interconnection cost. This type of information would help inform the

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<sup>1</sup> Docket No. E-002/M-13-867, ORDER APPROVING SOLAR-GARDEN PLAN WITH MODIFICATIONS, September 17, 2014.

<sup>2</sup> See Xcel Energy's Electric Rate Book Section 9 Sheets 64-99.

<sup>3</sup> Link to the Company's Tariffs:

[https://www.xcelenergy.com/company/rates\\_and\\_regulations/rates/rate\\_books](https://www.xcelenergy.com/company/rates_and_regulations/rates/rate_books)

extent and timing of upcoming interconnection work and help provide a window for planned outages relating to this type of work.

These tariff changes would also provide additional transparency into the queue and more readily allow CSG developers to reach out to each other to collaborate for purposes of study analysis or interconnection cost sharing.

Since 2015, the Company has interconnected over 700 MW of CSGs on the distribution system. All of these CSGs have been interconnected on fewer than 15 percent of our feeders. This high concentration of CSGs on relatively few feeders makes the public disclosure of the type of information in this Petition valuable to those CSGs that already are in commercial operation, as well as those in queue who may want to directly reach out to other developers sequentially in the same queue to explore options to share costs.

We are requesting that the following provisions be added to our Section 9 Tariff (1<sup>st</sup> Revised Sheet No. 66.1), in order to publicly provide information about CSGs in the interconnection queue previously kept confidential:

(3) The Company may publicly post the following information about each application submitted by each garden operator: Community Solar Garden location (city and county), name of the owner of the Community Solar Garden, AC Nameplate Capacity, application identification number, estimated in-service date (as of date of posting) if one has been derived, feeder name, whether or not an upgrade is expected to be required for the specific application, initial indicative cost estimate as set forth in the interconnection agreement (once established in a signed interconnection agreement), date of signed interconnection agreement, and whether or not the application is in commercial operation. This publicly posted information may be updated over time and initial or prior postings of this information may change over time.

The Company requested feedback on providing this data publicly as part of several of our S\*RC Implementation Workgroup including meetings held on November 7, 2019, January 27, 2020 and July 14, 2020 . The majority of developers support this approach, and none objected to changes moving forward; however, we note that not all developers agree upon which details should be included. The proposed tariff changes would only apply to CSG applications in the interconnection queue; we are not proposing to publish this information for other types of DER.

We provide the redlined and clean tariff sheets as Attachment A to this filing.

**Minnesota Electric Rate Book**

Sec. 9, Sheet 66.1

**VI. EFFECT OF CHANGE UPON XCEL ENERGY REVENUE**

No revenue effect on Xcel Energy revenue is expected.

**CONCLUSION**

The Company requests that the Commission approve our proposed CSG tariff changes for the Solar\*Rewards Community program in order to provide further transparency of CSGs in our interconnection queue and help to set expectations on upcoming planned outages due to interconnection work to accommodate CSG applications that are in the interconnection queue.

Dated: November 2, 2020

Northern States Power Company

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY  
FOR APPROVAL OF ITS PROPOSED  
COMMUNITY SOLAR GARDENS  
PROGRAM

DOCKET NO. E002/M-13-867

**PETITION  
TO PUBLISH CERTAIN INFORMATION  
ABOUT APPLICATIONS IN THE  
INTERCONNECTION QUEUE**

**SUMMARY OF FILING**

Please take notice that on November 2, 2020, Northern States Power Company, doing business as Xcel Energy, filed with the Minnesota Public Utilities Commission a Petition To Publish Certain Information about Applications in the Interconnection Queue that includes tariff revisions to our Solar\*Rewards Community program in the above referenced docket. We are requesting an adjustment to the tariff to publish certain information about Community Solar Garden (CSG) applications in the interconnection queue.

This Petition seeks to modify our CSG tariff to allow us to publicly provide, by CSG interconnection application, information such as feeder name, currently expected in-service-date, and estimated interconnection costs. This type of information would help inform other existing CSGs on the same feeder on the timing and extent of upcoming interconnection work that could result in a planned outage.



**Redline**

**SOLAR\*REWARDS COMMUNITY PROGRAM  
(Continued)**

Section No. 9  
~~4st~~2nd Revised Sheet No. 66.1

**TERMS AND CONDITIONS (Continued)**

k. Where the garden operator has begun the application process the following provisions apply:  
(1) Prior to the Company processing the application, the garden operator must submit a program application fee of \$1,200 to the Company. This application fee may be by check or wire transfer. The program application fee is meant to cover the cost to the Company of processing the program application. This is in addition to the interconnection application fee and other interconnection fees or costs.

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(2) Prior to the Company processing the application, the garden operator must submit a deposit of an amount equal to \$100/kW to the Company. This deposit may be submitted by check or wire transfer. The deposit will be eligible for release upon any of the following conditions: 1) full execution of the Interconnection Agreement, 2) garden operator withdrawal of Solar\*Rewards Community application in the online application system, or 3) Company cancellation of the application due to non-compliance with program or interconnection timelines or tariffs. For deposits held by the Company within thirty (30) days of receipt of the required deposit refund request paper work the Company shall return to the garden operator the deposit. When the deposit qualifies to be returned to the garden operator, it shall also include interest. Consistent with Minn. Stat. § 325E.02, the rate of interest will be set annually and will be equal to the weekly average yield of one-year United States Treasury securities adjusted for constant maturity for the last full week in November. The interest rate will be rounded to the nearest tenth of one percent. The rate of interest announced by the Commissioner of Commerce on or about December 15 of each year will be the rate of interest that will be paid on deposits returned during the subsequent calendar year.

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(3) ~~The Company may publicly post the following information about each application submitted by each garden operator: Community Solar Garden location (city and county), name of the owner of the Community Solar Garden, AC Nameplate Capacity, application identification number, estimated in-service date (as of date of posting) if one has been derived, feeder name, whether or not an upgrade is expected to be required for the specific application, initial indicative cost estimate as set forth in the interconnection agreement, date of signed interconnection agreement, and whether or not the application is in commercial operation. This publicly posted information may be updated over time and initial or prior postings of this information may change over time.~~

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l. Notwithstanding any other law, neither the garden operator nor the subscribers to a garden facility shall be considered a utility solely as a result of their participation in the garden facility.

(Continued on Sheet No. 9-67)

Date Filed: ~~12-14-18~~ 11-02-20 By: Christopher B. Clark Effective Date: 05-09-19  
President, Northern States Power Company, a Minnesota corporation  
Docket No. E002/M-13-867 & Order Date: 05-09-19  
~~E002/M-18-714~~

**Clean**

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**SOLAR\*REWARDS COMMUNITY PROGRAM  
(Continued)**

Section No. 9  
2nd Revised Sheet No. 66.1

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**TERMS AND CONDITIONS (Continued)**

k. Where the garden operator has begun the application process the following provisions apply:

(1) Prior to the Company processing the application, the garden operator must submit a program application fee of \$1,200 to the Company. This application fee may be by check or wire transfer. The program application fee is meant to cover the cost to the Company of processing the program application. This is in addition to the interconnection application fee and other interconnection fees or costs.

(2) Prior to the Company processing the application, the garden operator must submit a deposit of an amount equal to \$100/kW to the Company. This deposit may be submitted by check or wire transfer. The deposit will be eligible for release upon any of the following conditions: 1) full execution of the Interconnection Agreement, 2) garden operator withdrawal of Solar\*Rewards Community application in the online application system, or 3) Company cancellation of the application due to non-compliance with program or interconnection timelines or tariffs. For deposits held by the Company within thirty (30) days of receipt of the required deposit refund request paper work the Company shall return to the garden operator the deposit. When the deposit qualifies to be returned to the garden operator, it shall also include interest. Consistent with Minn. Stat. § 325E.02, the rate of interest will be set annually and will be equal to the weekly average yield of one-year United States Treasury securities adjusted for constant maturity for the last full week in November. The interest rate will be rounded to the nearest tenth of one percent. The rate of interest announced by the Commissioner of Commerce on or about December 15 of each year will be the rate of interest that will be paid on deposits returned during the subsequent calendar year.

(3) The Company may publicly post the following information about each application submitted by each garden operator: Community Solar Garden location (city and county), name of the owner of the Community Solar Garden, AC Nameplate Capacity, application identification number, estimated in-service date (as of date of posting) if one has been derived, feeder name, whether or not an upgrade is expected to be required for the specific application, initial indicative cost estimate as set forth in the interconnection agreement, date of signed interconnection agreement, and whether or not the application is in commercial operation. This publicly posted information may be updated over time and initial or prior postings of this information may change over time.

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l. Notwithstanding any other law, neither the garden operator nor the subscribers to a garden facility shall be considered a utility solely as a result of their participation in the garden facility.

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(Continued on Sheet No. 9-67)

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Date Filed:	11-02-20	By: Christopher B. Clark	Effective Date:
Docket No.	E002/M-13-867	President, Northern States Power Company, a Minnesota corporation	Order Date:

## CERTIFICATE OF SERVICE

I, Crystal Syvertsen, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota; or

xx by electronic filing.

**Docket No.: E002/M-13-867**

Dated this 2<sup>nd</sup> day of October 2020.

/s/

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Crystal Syvertsen  
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	ross.abbey@us-solar.com	United States Solar Corp.	100 North 6th St Ste 222C  Minneapolis, MN 55403	Electronic Service	No	OFF_SL_13-867_Official
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211  Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_13-867_Official
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St  Denver, CO 80204-8020	Electronic Service	No	OFF_SL_13-867_Official
Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP	396 Hayes Street  San Francisco, CA 94102	Electronic Service	No	OFF_SL_13-867_Official
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_13-867_Official
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-867_Official
Gabriel	Chan	gabechan@umn.edu		301 19th Ave S  Minneapolis, Minnesota 55455	Electronic Service	No	OFF_SL_13-867_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_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Solar	14333 Orchard Rd.  Minnetonka, MN 55345	Electronic Service	No	OFF_SL_13-867_Official
Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures	3500 Bloomington Ave. S  Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_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_13-867_Official
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd  Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_13-867_Official
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_13-867_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_13-867_Official
Matthew D.	Forsgren	mforsgren@greeneespel.com	GREENE ESPEL PLLP	222 S. Ninth Street, Suite 2200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd  Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_13-867_Official
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway  Minneapolis, MN 55405	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_13-867_Official
Sean	Gosiewski	sean@afors.org	Alliance for Sustainability	2801 21st Ave S Ste 100  Minneapolis, MN 55407	Electronic Service	No	OFF_SL_13-867_Official
Scott	Greenbert	scott@nautilussolar.com	Nautilus Solar Energy, LLC	396 Springfield Aver, Ste 2  Summit, NJ 07901	Electronic Service	No	OFF_SL_13-867_Official
Timothy	Gulden	timothy.gulden@yahoo.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr  Winona, MN 55987	Electronic Service	No	OFF_SL_13-867_Official
MeLena	Hessel	MHessel@elpc.org	Environmental Law & Policy Center	35 E. Wacker Dr. Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_13-867_Official
Lynn	Hinkle	lynnh@ips-solar.com	IPS Solar	2670 Patton Rd  Roseville, MN 55113	Electronic Service	No	OFF_SL_13-867_Official
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane  Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_13-867_Official
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236  Excelsior, MN 55331	Electronic Service	No	OFF_SL_13-867_Official
Julie	Jorgensen	juliejorgensen@greenmark solar.com	Greenmark Solar	4630 Quebec Ave N  New Hope, MN 55428-4973	Electronic Service	No	OFF_SL_13-867_Official
Ralph	Kaehler	ralph.kaehler@novelenergy.biz		N/A	Electronic Service	No	OFF_SL_13-867_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC	4710 Blaylock Way  Inver Grove Heights, MN 55076	Electronic Service	No	OFF_SL_13-867_Official
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road  Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_13-867_Official
William	Kenworthy	will@votesolar.org		18 S. Michigan Ave Ste 1200  Chicago, IL 60603	Electronic Service	No	OFF_SL_13-867_Official
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_13-867_Official
Aaron	Knoll	aknoll@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_13-867_Official
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave  Wayzata, MN 55391	Electronic Service	No	OFF_SL_13-867_Official
Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy	2639 Nicollet Ave., Suite 200  Minneapolis, Minnesota 55408	Electronic Service	No	OFF_SL_13-867_Official
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Marc	Miller	mmiller@soltage.com	Soltage, LLC	66 York Street, 5th Floor Jersey City, NJ 07302	Electronic Service	No	OFF_SL_13-867_Official
Marcus	Mills	Marcus@communitypower mn.org	Community Power	2720 E 22nd St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_13-867_Official
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_13-867_Official
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_13-867_Official
Eric	Pasi	ericp@ips-solar.com	IPS Solar	2670 Patton Rd Roseville, MN 55113	Electronic Service	No	OFF_SL_13-867_Official
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_13-867_Official
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_13-867_Official
Matthew	Pelikan	mpelikan@madellaw.com	Madel PA	800 Pence Bldg 800 Hennepin Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_13-867_Official
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_13-867_Official
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_13-867_Official
Jonathan	Roberts	jroberts@soltage.com	Soltage	66 York St 5th Floor Jersey City, NJ 07302	Electronic Service	No	OFF_SL_13-867_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-867_Official
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave  Saint Paul, MN 55105	Electronic Service	No	OFF_SL_13-867_Official
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_13-867_Official
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_13-867_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_13-867_Official
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828  Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_13-867_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_13-867_Official
Anna	Tobin	atobin@greeneespel.com	Greene Espel PLLP	222 South Ninth Street Suite 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-867_Official
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_13-867_Official
John	Vaughn	jvaughn@rreal.org	Rural Renewable Energy Alliance	3963 8th Street SW  Backus, MN 55435	Electronic Service	No	OFF_SL_13-867_Official