

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

COMPLIANCE FILING OF	}	
SOUTHWESTERN PUBLIC SERVICE	}	Case No. 22-00240-UT
COMPANY PURSUANT TO 17.9.573.9 NMAC	}	
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**NEW ENERGY ECONOMY’S JOINDER IN THE PROTEST AND COMPLAINT OF
COALITION FOR COMMUNITY SOLAR ACCESS AND
RENEWABLE ENERGY INDUSTRIES ASSOCIATION OF NEW MEXICO AND
REQUEST FOR EXPEDITED TREATMENT**

New Energy Economy (“NEE”) was a party before the Public Regulatory Commission in Case No. 21-00112-UT and filed comments on the Commission’s proposed Community Solar Rule, 17.9.573.1 - 17.9.573.22 NMAC (“573 Rule”). The Legislature included in the Community Solar Act, NMSA 1978 §62-16-B-1 to -8 (2021), a requirement that the Commission adopt a rule implementing requirements of the Community Solar Act; the 573 Rule was issued in response to that directive.

New Energy Economy hereby joins in and adopts the arguments contained in the Protest and Complaint of Coalition for Community Solar Access (“CCSA”) and Renewable Energy Industries Association of New Mexico (“REIA”), filed on October 3, 2021, made in response to the Advice Notice No. 309, filed by Southwestern Public Service Company (“SPS”) on September 9, 2022. SPS filed Advice Notice No. 309 pursuant to 17.9.573.9 NMAC, which requires SPS, along with Public Service Company of New Mexico (“PNM”) and El Paso Electric Company (“EPE”), to “file all tariffs, agreements and forms necessary for implementation of the community solar program.” NEE concurs that SPS’s proposed CS Bill Credit and SO Agreement are both unlawful because (1) the CS Bill Credit excludes transmission costs in violation of NMSA § 62-16B-7(B)(8) and 17.9.573.20(D) NMAC and (2) the SO Agreement includes a variety of provisions that are inconsistent with Commissions orders in the community

solar rulemaking and would needlessly undermine the program and are therefore unjust, unreasonable, and in violation of 17.9.573.6 NMAC.

Further, in its Motion to Stay Implementation of the Community Solar Rules, pending in the New Mexico Supreme Court, SPS stated: “SPS does not bring this motion to delay the community solar program. Xcel Energy, Inc., SPS’s parent company, has successfully implemented community solar programs in its Colorado and Minnesota service territories, and it stands ready to do the same in New Mexico.”¹ Yet, Xcel Energy was fined one million dollars by the Minnesota Public Utility Commission (PUC) for doing just that: more than a hundred complaints were filed against Xcel, accusing the utility of systemic failure for delaying access to community solar projects.² In addition to the \$1M fine and other specific’s the Minnesota PUC ordered:

1. Xcel Energy must phase out, for feeders and substations that are not clearly documented as capacity constrained, the “on-hold” practice of staying project timeframes to perform serial review of interconnection applications over the course of a year with quarterly compliance reporting.
2. Within 30 days, Xcel Energy must expand its parallel processing to all fast-track projects, applied only to areas where there are no known capacity constraints.³

Pursuant to 1.2.2.35D(1) NMAC, the Commission can take administrative notice of regulatory Orders in other jurisdictions. It appears that there is a pattern and practice by SPS/Xcel to thwart the economic activity of businesses seeking to enter the renewable energy market and provide renewable energy services to the public, including, but not limited to, SPS’

¹ S-1-SC-39432, *Appellant Southwestern Public Service Company’s Motion to Stay Implementation of Public Regulation Commission Orders Pending Appeal*, 8/17/2022, p. 2.
² Exhibit A, Docket Nos. E,G-002/CI-02-2034 & E,G-002/M-12-383 Minnesota Public Utility Commission, (Feb. 18, 2021)

³ Exhibit B, Docket No. E-999/CI-16-521, Minnesota Public Utility Commission, (Mar. 31, 2022), at p. 10.

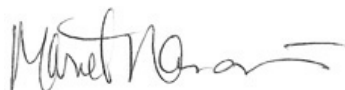
proposed 16-page document full of legalese that will likely intimidate and turn off potential subscribers, particularly low-income subscribers.

The Commission should reject SPS's proposed CS Bill Credit as unlawful on its face, and suspend the remainder of the Advice Notice, including the SO Agreement, and set the matter for public hearing and consider penalties⁴ against SPS for failing to obey, observe, or comply with the Commission's Orders.⁵ Lastly, NEE concurs that the Commission should consider consolidating this proceeding with the proceedings opened for the community solar advice notice filings of PNM and EPE.

DATED this October 3, 2022.

Respectfully submitted,

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⁴ NMSA § 62-12-4.

⁵ 17.9.573.20(D) NMAC states that “[t]he utility shall not subtract **any** costs of transmission from the solar bill credit rate calculation.” *See also*, Case No. 21-00112-UT, *Order Adopting Rule*, p. 137 (Mar. 31, 2022). (Community Solar Act’s “express exclusion of distribution costs from the credit renders the Legislature’s silence on transmission costs a clearly intentional omission, and thus, indicates an intent not to exclude transmission costs.”); Case No. 21-00112-UT, *Order Partially Granting Five Motions for Rehearing, Reconsideration, and Clarifications of Commission’s Order Adopting Rule and Denying Four Other Such Motions; Order Partially Granting SPS’s and EPE’s Request for Procedural Clarifications and for Stay of Implementation Pending Further Rulemaking*, pp. 12, 25, (May 18, 2022); Case No. 21-00112-UT, *Order Denying Southwestern Public Service Company’s Motion to Stay Implementation of Rule Pending Appeal*, P 43 (Aug. 10, 2022) (citing NMSA 1978, § 62-16B-7(B)(8)).

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CERTIFICATE OF SERVICE

This is to certify that on this 3rd day of October, 2022, I did serve a copy of:

NEW ENERGY ECONOMY’S JOINDER IN THE PROTEST AND COMPLAINT OF
COALITION FOR COMMUNITY SOLAR ACCESS AND
RENEWABLE ENERGY INDUSTRIES ASSOCIATION OF NEW MEXICO AND
REQUEST FOR EXPEDITED TREATMENT, Exhibit A & EXHIBIT B

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of an Investigation and Audit of
Northern States Power Company's Service
Quality Reporting

ISSUE DATE: February 18, 2021

DOCKET NO. E,G-002/CI-02-2034

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

DOCKET NO. E,G-002/M-12-383

ORDER ACCEPTING FILING AND
DENYING REQUEST TO EXCLUDE
COMPLAINTS

PROCEDURAL HISTORY

In December 2019, Northern States Power Company d/b/a/ Xcel Energy (Xcel or the Company) received 129 complaints through the Commission's Consumer Affairs Office (CAO). The complaints were initiated primarily by one solar installer,¹ and all were regarding problems with interconnection applications.

On May 1, 2020, Xcel filed its 2019 Quality of Service Plan (QSP) annual report. Xcel requested that the Commission find that the 129 complaints from solar installers did not count towards the Customer Complaint metric in the QSP tariff.

On July 1 and 2, 2020, the Commission received initial comments from the following commenters:

- All Energy Solar (AES)
- Minnesota Solar Energy Industries Association (MnSEIA)
- Novel Energy Solutions (NES)
- Interstate Renewable Energy Council, Inc., Fresh Energy, Environmental Law and Policy Center, and Vote Solar (jointly, IREC et al.)
- Department of Commerce, Division of Energy Resources (the Department)
- City of Minneapolis

¹ 128 complaints were initiated by All Energy Solar; one complaint was initiated by a different solar installer.

Between August 7 and 10, 2020, the Commission received reply comments from the following commenters:

- Citizens Utility Board (CUB)
- Sundial Energy Solar
- City of Minneapolis and City of St. Paul
- AES
- Xcel
- IREC et al.
- The Department
- MnSEIA

Between August 10 and December 1, 2020, the Commission also received comments from several members of the public.

On January 21, 2021, the Commission met to consider the matter.

FINDINGS AND CONCLUSIONS

I. Background

A. Overview of QSP tariff and MN DIP

In 2002, the Commission initiated an investigation of Xcel's service quality and the accuracy of Xcel's reports about its service quality, among other things.² An independent auditing firm conducted the investigation and identified a number of concerns regarding how Xcel recorded, documented, and reported service quality information.

Xcel subsequently negotiated a settlement agreement with the Department and the Office of the Attorney General. In 2004, the Commission accepted the settlement agreement, which included QSP standards and an annual reporting requirement.³ Additionally, underperformance payments were established for failing to meet the QSP standards.

In 2012, Xcel petitioned for amendments to the QSP tariff, and in 2013 the Commission approved amendments to the tariff language, including definitions and performance thresholds.⁴

² *In the Matter of the Inquiry Into Possible Effects of Financial Difficulties at NRG and Xcel on NSP and its Customers and Potential Mitigation Measures*, Docket No. E, G-002/CI-02-1436, Order Requiring Additional Information and Audit (October 22, 2002).

³ *In the Matter of an Investigation and Audit of Northern States Power Company's Service Quality Reporting*, Docket No. E,G-002/CI-02-2034, Order Accepting Settlement Agreement as Modified (March 10, 2004).

⁴ *In the Matter of an Investigation and Audit of Northern States Power Company's Service Quality Reporting*, Docket No. E,G-002/CI-02-2034; *In the Matter of the Petition of Northern States Power*

The language approved in 2013 is the current QSP tariff language.

The QSP tariff compels a \$1 million underperformance payment for each benchmark, with 50% applied to customer bills and 50% added to the amount budgeted for maintenance and repair of the Company's distribution system. These payments are not eligible for cost recovery in future rate proceedings.

In 2017, the Commission convened the Distributed Generation Work Group (DGWG) to update statewide interconnection standards, ultimately resulting in the Minnesota Distributed Energy Resource (DER) Interconnection Process and Agreement (MN DIP) and accompanying Technical Interconnection and Interoperability Requirements. Rate-regulated utilities filed tariff language to implement the MN DIP; Xcel's MN DIP tariff was approved in Docket No. 18-714. The statewide MN DIP went into effect in June 2019.

B. December 2019 CAO complaints

The CAO helps resolve disputes between customers and utility companies. If a customer is unable to resolve an issue with a utility directly, the customer may submit a written complaint to the CAO. After reviewing all necessary information, CAO will contact the utility with specific questions. In complaints involving interconnection of distributed energy resources, CAO and the Commission's Economic Analysis Unit will engage with the utility and the customer until all questions are answered and the complaint is resolved as completely as possible.

In late December 2019, CAO received 129 complaints regarding delays and technical issues with Xcel's solar interconnection process. 128 of those complaints were filed by AES. Commission staff held separate in-person meetings with both AES and Xcel, and Xcel asked whether solar customers had given AES consent to file the complaints. Commission staff asked AES to acquire consent from any of their clients who had not already given such consent. Some complaints were resolved before staff could obtain consent from the customer; staff did not retroactively ask for consent for closed cases.

C. Xcel's 2019 QSP annual report and request to exclude complaints

On May 1, 2020, Xcel filed its QSP annual report for 2019, as required by the QSP tariff. In addition, Xcel requested that the Commission exclude the 129 complaints from solar installers from the customer complaints metric, thereby keeping the number of customer complaints under the QSP threshold for the \$1 million underperformance payment.

Xcel stated that the complaints did not meet the definition of a "customer complaint" filed by a "customer" under the QSP tariff, and they were not the type of complaint contemplated when the metric was originally developed. These arguments are discussed further below.

Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service Quality Tariffs, Docket No. E,G-002/M-12-383; Order Approving Settlement Agreement with Minor Modifications (August 13, 2013).

II. Party Comments

Eight parties commented in this docket; generally, the Department supported Xcel's request to exclude the 129 complaints and other parties were opposed. Parties disagreed on several main issues, including the definition of a "customer complaint" under the QSP tariff, whether the presence or absence of financial harm to customers should be considered, whether the scope of complaints included in the QSP or the QSP complaint threshold should be modified, and whether the QSP underperformance payment or an additional penalty should be imposed on Xcel.

A. Definition of "customer complaint"

The QSP tariff defines "customer complaint" as "any complaint submitted, in writing, by US Mail, e-mail, or by fax, registered by the Minnesota Public Utilities Commission's Consumer Affairs Office to the Company, regarding a complaint submitted by an Xcel Energy customer in which the customer states a grievance related to the Company's provision of service to that customer"⁵ and notes that "[c]ustomer complaints will be recorded and reported with no exclusions. The Company may request exclusion of Customer Complaints that the Company can demonstrate are the result of an event beyond the Company's control, which the Company took reasonable steps to address."⁶

The QSP tariff defines a "customer" as "an electric or a natural gas customer that receives a bill for utility service from the Company or a representative of that customer. A representative includes an individual designated with Power of Attorney for the Customer, an attorney retained to represent the Customer, or an individual authorized by the Customer to act on his/her account."⁷

Xcel argued that the solar installers did not fall under the definition of a "customer," and therefore complaints made by solar installers could not be defined as "customer complaints." Xcel stated that the solar installers had not been authorized by their clients—who are the actual Xcel bill recipients—to bring complaints to CAO. Additionally, Xcel argued that the complaints were mostly regarding technological issues with the Company's online MN DIP application portal, not complaints about the "provision of service to [the] customer," as required by the definition of "customer complaint."

Furthermore, Xcel stated that the solar installers had not followed the dispute resolution processes in MN DIP, which state that only an "interconnection customer" can bring a complaint to CAO. Xcel noted that solar installers are considered "application agents," not "interconnection customers," under MN DIP.

The Department argued that the term "customer complaint" should be "interpreted using common usage or understanding," and stated that complaints filed by vendors such as the solar installers in this docket should not be considered "customer complaints" unless it is unambiguous that the vendor's complaint is for the financial benefit of affected customers.

⁵ Xcel Energy rate book, section no. 6, sheet no. 7.2.

⁶ Xcel Energy rate book, section no. 6, sheet no. 7.7.

⁷ Xcel Energy rate book, section no. 6, sheet no. 7.2.

Other parties argued that the 129 complaints filed by solar installers did fall under the QSP definition of a “customer complaint.” AES maintained that it was authorized to submit complaints on behalf of its customers, either through contract language, through explicit customer permission, or by placing the customer on notice that complaints were submitted. IREC et al. and other parties agreed with this interpretation. IREC et al. also argued that if the complaints at issue were not counted towards the QSP threshold, this would mean that solar customers were treated differently from other electric customers and subjected to a lower quality of service.

MnSEIA also noted that MN DIP allows an Application Agent to act on behalf of the Interconnection Customer to handle the application process and stated that solar installers are best equipped to resolve interconnection issues because they have the necessary knowledge.

B. Financial harm

The Department argued that the common usage of the term “customer complaint” implies that a customer has been harmed. The Department argued that a complaint should only be counted for purposes of the QSP if the customer suffered a financial harm, and that there was not enough information to determine whether this had occurred in the 129 solar installer complaints.

AES and other parties stated that there had been financial harm to customers, noting that Xcel’s delays had led to certain customers losing a portion of a federal tax credit for solar installations. The cities of Minneapolis and St. Paul also noted that interconnection delays may cause lost revenue from on-site energy production, and lost time and increased transaction costs for the project.

Parties also argued that financial harm was not part of the definition of a customer complaint and should not be considered. Several parties pointed to the QSP tariff language stating that “customer complaints will be recorded and reported with no exclusions,” and argued that this language means that any factors not explicitly included in the QSP tariff—including financial harm—should not be grounds to exclude complaints.

C. Reevaluation of QSP threshold or scope

Xcel argued that, when the QSP tariff was written, the definition of “customer”—and particularly a “representative” of a customer—did not contemplate a solar installer filing a complaint on behalf of a client. Rather, Xcel stated that it was written to allow, for example, an adult child to file a complaint on behalf of an elderly parent. Xcel noted that, in 2013, solar developers such as AES, who are involved with each step of the installation and interconnection process, did not exist, and the Company and Commission could not anticipate this use of the CAO complaint process. Additionally, Xcel argued that the large number of complaints filed at the end of the calendar year made it impossible for the Company to resolve issues earlier and potentially avoid exceeding the customer complaint threshold. Xcel suggested that the QSP performance threshold be reevaluated if the interconnection complaints were counted towards the customer complaint metric.

The Department did not support recalculation of the QSP threshold, but suggested addressing interconnection complaints from solar installers in Xcel's MN DIP tariff docket⁸ rather than in the QSP tariff. The Department noted that interconnection matters are more complex than usual customer complaints, and tracking them in the Company's MN DIP docket could help parties learn more about interconnection issues. Xcel supported this idea generally, but proposed tracking and reporting MN DIP complaints in the statewide MN DIP docket.⁹

Other parties opposed the suggestions to change the QSP threshold or the scope of complaints addressed in the QSP tariff. IREC et al. and the City of Minneapolis both argued that counting all customer complaints in the QSP tariff would hold Xcel accountable and incentivize the Company to resolve interconnection issues. IREC et al. also suggested that the Commission track and enforce Xcel's compliance with MN DIP timelines as part of the QSP metrics, separate from the customer complaint metric.

D. Underperformance payment or other penalty

Under the QSP tariff, the underperformance payment for exceeding the threshold for customer complaints is \$1 million. Additionally, "[t]he determination of a required payment under this provision will be made, after notice and hearing, by the [Commission]."¹⁰

Generally, as discussed above, Xcel and the Department argued that the 129 solar installer complaints should not be counted towards the threshold and the \$1 million payment should not be imposed on the Company; other parties argued that the \$1 million payment should be imposed.

MnSEIA suggested that, in addition to the \$1 million payment contemplated by the QSP tariff, the Commission should impose an additional financial penalty to be paid to the impacted customers. MnSEIA stated that its proposed additional penalty of \$0.013 per kilowatt-hour (kWh) was an estimate of financial harm done to the average solar array due to Xcel's delays, including loss of federal tax credits, challenges with procuring equipment, additional development costs, project cancellations, and interest on refundable deposits.

III. Commission Action

The Commission will accept Xcel's QSP annual filing as in compliance with the reporting requirement in section 1.9.D of the Company's tariff. However, the Commission will deny Xcel's request to exclude the 129 complaints filed by solar developers on behalf of customers from the QSP customer complaints metric; Xcel will therefore be subject to the underperformance payment.

The QSP tariff is clear—written complaints from Xcel's bill payers or their representatives are to be counted towards the metric, with no exclusions except as defined in the tariff. Solar installers

⁸ *In the Matter of Xcel Energy's Tariff Revisions Updating Interconnection Standards for Distributed Generation Facilities Established under Minn. Stat. §216B.1611*, Docket No. E-002/M-18-714.

⁹ *In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established Under Minn. Stat. § 216B.1611*, Docket No. E-999/CI-16-521.

¹⁰ Xcel Energy Rate Book, section no. 6, sheet no. 7.5.

such as AES are hired by their clients to manage all aspects of solar installation, including the interconnection process; for this purpose, the solar installer is the representative of the client. Requiring individual customers to understand the details of the interconnection process and file complaints on their own would set an unreasonable expectation; it is reasonable for a customer to assume that the solar installer it has hired will handle all problems that arise during the installation, including problems that arise with the interconnection process. Furthermore, in this case, AES' contracts with its clients specifically state that AES will determine the "method, details, and means of performing the work."¹¹ Resolving interconnection issues is a critical and complicated detail, without which the work cannot be completed.

Xcel has not alleged that the interconnection issues were outside the Company's control, only that these complaints should be treated differently from other types of customer complaints. However, the QSP tariff does not contemplate any additional factors such as those proposed by Xcel and the Department—neither financial harm nor the timing of complaints in the calendar year are relevant to whether those complaints should be counted. Although the situation that has arisen in this docket may not have been anticipated at the time the QSP tariff was written, the Commission will not retroactively change the tariff requirements.

Going forward, the Commission will direct Xcel to work with stakeholders to develop a mechanism to help resolve solar installation issues before they rise to the level of a customer complaint under the QSP. This mechanism should be complementary to and consistent with MN DIP, and will help ensure that issues involving multiple customers are addressed proactively, rather than relying on individual customer complaints. The Commission's priority is ensuring that the reported interconnection issues are resolved, and the process is improved. Xcel and stakeholders should work together to establish a process for handling this type of relatively small dispute before a CAO complaint becomes necessary. In future years, the Commission anticipates that this additional process will help Xcel keep its customer complaints under the QSP threshold.

Finally, the Commission will direct Xcel to submit quarterly reports on the solar interconnection process, including information about interconnection requests received, any disputes or problems that have arisen, any work in progress to improve the interconnection process, and other relevant information as listed below. These updates will provide important information as the Commission closely tracks this issue going forward.

ORDER

1. Xcel's 2019 QSP filing is accepted as in compliance with the annual filing requirement included in Section 1.9.D of the Company's tariff.
2. Xcel's request to dismiss the 129 complaints from counting toward the Company's Quality Service Plan performance threshold for "Customer Complaints" is denied.
3. Xcel shall work with stakeholders to develop, outside the QSP customer complaint metrics, a different mechanism or tariff to resolve solar installation issues before they become QSP complaints, that provides clear transparency to the installers and customers

¹¹ AES reply comments, at 5 (August 10, 2020).

for the tracking and holding accountable of Xcel Energy's compliance with the MN DIP timelines. By June 1, 2021, or another date agreed upon with the Executive Secretary, Xcel shall propose such a tariff or mechanism.

4. Beginning with the first quarter of 2021, and quarterly thereafter, Xcel shall report on the number of interconnection requests received, the number and status of interconnection requests in process, the number of interconnection requests withdrawn and the reason, and the number of interconnection requests successfully completed. The reports shall include, at a minimum, a detailed assessment of compliance with required timelines, the number and status of any disputes or complaints, and a description of any work in progress to improve the interconnection process. The Commission delegates authority to the Executive Secretary to establish the specific details for quarterly reporting of Xcel Energy's compliance with the interconnection process. The quarterly reporting will be guided by the updated temporary annual reporting required in Docket No. E-999/CI-16-521.
5. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert
Executive Secretary



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CERTIFICATE OF SERVICE

I, Leesa Norton, 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

**ORDER ACCEPTING FILING AND DENYING REQUEST TO EXCLUDE
COMPLAINTS**

Docket Number **E,G-002/CI-02-2034; E,G-002/M-12-383**

Dated this 18th day of February, 2021

/s/ Leesa Norton

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of Updating the Generic
Standards for the Interconnection and
Operation of Distributed Generation Facilities
Established under Minn. Stat. § 216B.1611

ISSUE DATE: March 31, 2022

DOCKET NO. E-999/CI-16-521

**ORDER MODIFYING PRACTICES
AND SETTING REPORTING
REQUIREMENTS**

PROCEDURAL HISTORY

On January 24, 2017, the Commission established the Distributed Generation Workgroup (DGWG) to develop the Minnesota interconnection technical standards.¹ The DGWG is led by the Commission and participants work collaboratively.

On July 16, 2021, the Commission requested comments on changes proposed in the DGWG's subgroups' final reports, specifically on issues related to managing interconnection queues.

By August 25, 2021, comments were received from the following:

- All Energy Solar (AES),
- City of Minneapolis,
- Dakota Electric Association (Dakota Electric),
- Minnesota Department of Commerce, Division of Energy Resources (the Department),
- Fresh Energy (including a proposal by Fresh Energy, All Energy Solar, and TruNorth Solar),
- Institute for Local Self Reliance (ILSR),
- Interstate Renewable Energy Council (IREC),
- Minnesota Power,
- Minnesota Solar Energy Industries Association (MnSEIA),
- Nokomis Energy,
- Northern States Power Company d/b/a Xcel Energy (Xcel Energy),

¹ Order Establishing Workgroup and Process to Update and Improve State Interconnection Standards (Jan. 24, 2017). This order was concurrently filed in *In the Matter of Establishing Generic Standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities under Minnesota Laws 2001, Chapter 212*, Docket No. E-999/CI-01-1023 on the same date.

- Novel Energy Solutions (NES), and
- Otter Tail Power Company (Otter Tail).

By October 1, 2021, additional comments were received from the following:

- AES,
- Dakota Electric,
- The Department,
- Fresh Energy,
- ILSR,
- MnSEIA,
- Minnesota Power,
- Nokomis Energy,
- NES,
- Otter Tail,
- Pivot Energy,
- Solar United Neighbors, and
- Xcel Energy.

On January 20, 2022, the Commission met to consider this matter.

FINDINGS AND CONCLUSIONS

I. Summary

In this order, the Commission requires Xcel Energy to modify its treatment of pending and future interconnection requests.

II. Introduction

The Commission is charged under Minn. Stat. § 216B.1611 with establishing statewide standards for the interconnection and parallel operation of distributed energy resources (DER) of no more than 10 megawatts (MW).² Towards that end, the Commission established the Minnesota Distributed Energy Resources Interconnection Process (MN DIP), which outlines a procedure and provisions for the interconnection of DER.

Much of the work of developing proposals and establishing processes has been informed by extensive work of the DGWG and its subgroups.

² “Distributed Energy Resources” (DER) is emerging terminology used to capture both traditional “distributed generation” and storage technologies; however, this term is not currently defined in Minnesota statutes or rules, and at times the Commission applies it to a broader category that includes demand-side management (controlling load like air conditioners or water heaters) and, in some cases, energy efficiency and electric vehicles. Under MN DIP, the term is limited to generation and storage and does not apply to technologies that are load-based, such as a load center.

III. Xcel Energy's Interconnection Queue Management

At any given time, multiple interconnection requests are filed with Xcel Energy. Under MN DIP, these are collected into a single administrative queue.³ Xcel Energy processes this queue sequentially and has frequently placed projects, of all sizes, “on-hold” until the interconnection review of the project ahead in queue is complete and either has a signed agreement or has been withdrawn; interconnections of 40 kilowatts (kW) or less may continue moving forward through the process in parallel (parallel review) if doing so would not materially affect projects ahead in queue, and in turn, equipment or system reliability. Xcel Energy also pauses the MN DIP review timeframes for applications with an on-hold designation. The Company has begun hiring additional staff to assist with reducing review times.

A. Positions of the Parties

1. Xcel Energy

Xcel Energy explained that designating projects as being on-hold was necessary under MN DIP, which requires the sequential processing of interconnection requests. Xcel Energy also noted the parameters of projects ahead in queue provided critical information for subsequent studies, since approved projects affect the available capacity of distribution equipment. This approach minimizes re-studies and conserves time and money of both the DER customers, including developers and homeowners, and Xcel Energy.

2. The Department

The Department recommended changes to Xcel Energy's queue management, including support for the Company's implementation of parallel review of projects equal to or less than 40 kW. The Department further recommended applying parallel review of projects larger than 40 kW where there is no known existing capacity constraint on the feeder or substation as a way to “fast-track” projects between 20 kW and 5 MW. Although concerned that the smaller projects 40 kW or less may be assigned expensive interconnection costs, the Department supported the change, which would expedite application review. The Department also recommended that the Commission require Xcel Energy to track the status of applications in parallel review, as well as the status of interconnection applications that are sequentially reviewed, and to subsequently report the data.

3. Other Commenters

Fresh Energy opposed placing projects on hold. It noted that the on-hold designation was not part of MN DIP and was an internal process developed by Xcel Energy. Fresh Energy argued that, in practice, Xcel Energy's approach prevented any overlap of the review process. This led to lengthy queues, in some cases anticipated to take longer than 8 years. MNSEIA, Nokomis, Novel Energy, and AES, who shared in Fresh Energy's opposition, cited their own experiences with the interconnection process.

³ Under MN DIP 1.8.3, the queue may be subdivided by geographical region (i.e. feeder, substation, etc.).

Fresh Energy, MNSEIA, Nokomis, Novel Energy, and AES also recommended that projects greater than 40 kW be processed in parallel if there are no known capacity constraints on the substation or feeder. For other projects, they recommended a semi-parallel process based on when projects met certain milestones in the review process. IREC similarly recommended the Commission remain open to considering parallel studies to reduce review timeframes and improve interconnection queue management. AES and ILSR recommended applying a fast-track process to projects in areas where there are no known capacity constraints.

Nokomis, AES, Fresh Energy, MnSEIA, Pivot Energy, and IREC recommended requiring Xcel Energy to end the on-hold process. They were united in their position that updates to that process should be made, and they therefore suggested several different timelines, ranging from immediately to a year, and solutions, varying from modifications to Xcel Energy's administrative treatment to adding more engineering staff.

B. Commission Action

Based on the comments of all the parties, it is clear the time it takes to interconnect some projects to Xcel Energy's system is too long—in some areas projects are estimated to spend years in queue. This is inconsistent with the legislature's policy goal to promote and ease the interconnection of DER.

Several solar developers identified Xcel Energy's use of the on-hold status as a major roadblock to the timely processing of applications. When projects are on hold, and the parallel review process is unavailable, the review process is stopped completely, including the steps applicable to other projects in queue that could potentially be processed concurrently with the application under active review. Although Xcel Energy has legitimate reasons to place projects on hold—the scope of approved projects can affect the capacity available for later ones—the time projects are placed on hold has increased in some cases to years.

To address these delays, the Commission will require Xcel Energy to phase out the practice of placing project on hold and instead adopt practices to expedite the review process. For projects in areas where there are no known capacity constraints, simplified and fast-track interconnection projects can be processed in parallel. In these situations, there is less concern about projects exceeding Xcel Energy's equipment's limitations. This would apply to fast-track projects larger than 40 kW in areas with no known capacity constraints, as well as to projects in known capacity-constrained areas where the proposed project does not trigger the capacity constraint.

For projects in capacity-constrained areas or that are greater than 40 kW but cannot be processed in parallel, Xcel Energy should continue processing these interconnection applications sequentially. However, Xcel Energy should begin concurrent processing of projects once the one ahead-in-queue has begun a facilities study. This overlap will decrease the time between when an interconnection request is made and approved (which is longer than the time a project spends under review). In making this change, the Commission understands that projects may still spend a significant time in queue—Xcel Energy has led Minnesota's utilities in the number of interconnection requests and successfully interconnected DERs—rather, the Commission's goal is to shorten the time to a decision on approval as much as possible.

Because this change is significant, the Commission concurs with the Department that it deserves additional monitoring. The Commission will require Xcel Energy to make quarterly compliance reports with specific information, the requirements for which are listed in detail in the ordering paragraphs set forth below.

IV. Group Studies

Group studies are a method of studying several projects simultaneously, such as in a cluster, rather than individually in a series. Cluster studies involve grouping a series of DER projects together for a system impact study and later a facilities study. In other words, DER projects are considered as a whole for purposes of the analyses and related actions. DER projects that are clustered also share various costs, including system upgrades, if required. Under MN DIP, cluster studies require the utility and interconnection customer to mutually agree to undertake the study.

A. Positions of the Parties

1. Xcel Energy

Xcel Energy proposed group studies be used in areas with no known capacity constraints as a method to speed up review. It also proposed their use for large projects in areas with capacity constraints to ensure appropriate upgrades are made. Xcel Energy specifically proposed three different types of group studies:

1. Distribution Group Studies. The “Distribution Group Study” is aimed at projects in non-capacity constrained queues that do not currently risk exceeding the DER capacity limits.
2. Transmission and Distribution Studies. Transmission and Distribution Studies are aimed at projects in capacity constrained areas that would exceed the capacity limit and require substantial upgrades like a new feeder or substation transformer are required.
3. Voluntary Cluster Studies. At any point, applicants may voluntarily request a cluster study, at which point they would be placed into one of the two queues.

2. The Department

The Department generally supported the idea of a group study pilot program but disagreed with limiting the use to locations without capacity constraints. The use of group studies for capacity constrained projects would potentially benefit an individual project and improve queue management by allowing shared costs of significant system upgrades among project developers.

The Department noted that a number of issues needed to be resolved before implementing group studies, including but not limited to the number of participants, whether participation is mandatory or voluntary, the circumstances under which a participant may drop out of the study, and consequences for dropping out of a study.

3. Other Commenters

Fresh Energy, MNSEIA, Nokomis, Novel Energy, and AES were generally supportive of the use of group studies, viewing this process change as an important tool to address existing problems in capacity constrained locations. Fresh Energy, along with MnSEIA and IREC, was concerned with the lack of technical information about these locations in the record. As a result, Fresh Energy suggested Xcel Energy complete a technical assessment beforehand to ensure that the parties and Commission had accurate information.

Other commentors also took issue with the specifics of Xcel Energy's proposal. They noted that the proposal was not codified in MN DIP, leaving Xcel Energy with broad discretion to design and implement the process.

The Department, Fresh Energy, MnSEIA, and IREC recommended that the Commission convene a stakeholder workgroup to identify, and where possible, resolve remaining key issues.

B. Commission Action

The Commission will grant Xcel Energy a variance to MN DIP 1.8.3 to pilot mandatory group studies for areas with three or more applications greater than 40 kW that cannot be reviewed in parallel. The Commission echoes the Department—in these situations, allowing individual projects to share costs will help spread what can be a significant financial hurdle. Under existing practice, the project at the front of the queue may solely bear the burden of financing upgrades that benefit other in-queue DER customers.

The Commission will also direct Xcel to create a working group to discuss and finalize the details of the group study process, as set forth in the ordering paragraphs below. Having clear guidance for group studies will benefit all parties. It will not only allow DER customers to advance their projects, but it will also allow Xcel Energy a clear and organized process moving forward. Given the number of interconnection applications filed with Xcel Energy, reasonable efforts should be made to streamline the process.

Finally, the Commission agrees with Fresh Energy that a more complete technical assessment will be an asset to the Commission and parties. As a result, Xcel Energy must file information on participating applications, relevant feeder and substation characteristics, the time in which each phase of the study was completed, any group retention measures (deposits or penalties), the general cost allocation process used, and any disputes that arose. The continuing use of group studies is not set in stone; rather, the Commission aims to obtain useful data from this effort for making informed decisions moving forward.

V. DER Planning Limits

Xcel Energy currently allows DER interconnections up to a technical planning limit that is the sum of the equipment rating and the daytime minimum load (DML), the demand for electricity during the daytime.

A. Positions of the Parties

1. Xcel Energy

After extensive input from stakeholders, Xcel Energy proposed setting the DER technical planning limit at 80% of the equipment's rating plus DML. Although the exact DML is variable, Xcel Energy proposed this limit to ensure the safe and reliable parallel operation of DER. Further, Xcel Energy asserted it had authority to implement this change because it was an engineering decision solely within its purview. In response to opposition from stakeholders on this issue, Xcel stayed implementation pending Commission consideration.

Xcel Energy further proposed to lower the available capacity for all DER projects by reserving 25% of the technical planning limit for DER systems less than 40 kW. This small DER capacity reservation would require an amendment to MN DIP.

2. Other Commenters

Several commentors, including Fresh Energy and IREC, opposed Xcel Energy's changes to the technical planning limit. They noted the change would significantly reduce the total DER capacity, that Xcel Energy had not demonstrated the technical justifications for it, and that the change requires Commission approval.

Many of the same commenters also spoke against Xcel Energy's small DER capacity reservation. They noted the cap was arbitrary and addressed a narrow problem. Several noted that such a reservation was discriminatory—it favored customers with on-site distributed energy over customers seeking community solar garden subscriptions.

B. Commission Action

At this time, the Commission believes that the DML issue deserves further study and will require Xcel Energy to raise specific issues with DML in its quarterly compliance filings. While the commenters opposing Xcel Energy's change to the technical planning limit have valid concerns, the limitation may have a foundation in sound engineering practice. The Commission, however, cannot make that determination at this time based on the limited information in the record. Instead of making a change now, the Commission will require Xcel Energy to provide information which will help all parties in the future.

The Commission will also reject Xcel Energy's proposed 25% reservation for DER systems smaller than 40 kW and corresponding edit to the MN DIP. The change is not well supported by the record and favors homeowner-owned systems over community solar gardens. However, neither the Commission's statutes or rules include such a preference. Like several commenters, the Commission is concerned that such a change could become problematic in practice, if not necessarily in intent.

VI. Upgrade Costs for Smaller Projects

To facilitate continued DER development and growth, equitable access for all sizes of DER, and timeline efficiencies, a DGWG subgroup had identified cost-sharing proposals, and Xcel Energy also proposed funding system upgrade costs for some small residential projects.

A. Positions of the Parties

1. Xcel Energy

Xcel Energy proposed to pay for distribution system upgrades up to \$15,000 per new, residential Solar*Rewards interconnection application for distribution upgrades using Solar*Rewards funds, capped annually at \$250,000. Xcel Energy offered to fund “shared” system components such as transformers.⁴

2. The Department

The Department objected to recovering upgrade costs associated with individual rooftop solar installations using Solar*Rewards funds, which are drawn from all customers. While solar generation has benefits for all customers, the Department noted the economic benefit of homeowner-owned solar flowed to one household. This imbalance harmed many households, such as renters, since the cost was spread to many, including those currently struggling to pay their utility bills.

3. Other Commenters

MnSEIA supported Xcel Energy’s proposal because it would encourage residential and small business customers to install DER. MnSEIA proposed expanding the benefit further to system-wide upgrades for all small projects.

Fresh Energy cautiously supported Xcel Energy’s proposal. Fresh Energy believed the program needed defined boundaries and was concerned about how Xcel Energy tied the benefit to the Solar*Rewards program. Several solar developers echoed these concerns.

Fresh Energy, IREC, and TruNorth Solar proposed an alternative cost-sharing proposal applicable to small DER upgrades that would be funded by a one-time fee charged to every DER application for 40 kW and under. Their proposal also included eligibility requirements, a system for calculating upgrade charges, and program operations.

B. Commission Action

The Commission supports the cost-sharing proposal. This option reduces risk to customers who have considered a small on-site DER solution that triggers a distribution upgrade, while also protecting ratepayers from costs associated with benefits to individual customers. The legislature has encouraged DER, with cost savings and reliability benefits to customers, and the proposal furthers this important public policy objective.

Fresh Energy, IREC, and TruNorth Solar have identified a clear outline for the process, and Xcel Energy’s implementation plan should follow these guidelines. Because the alternative proposal does not have a cap, the Commission will approve Xcel Energy’s proposed cap of \$15,000 per individual customer upgrade. Depending on the success of the program, this amount may be

⁴ Xcel Energy noted that some upgrades such as individual residential service lines, metering, etc. will still be fully paid for by the requestor, similar to what occurs at the time of the filing.

modified in the future. Similarly, the source of the funds may be subsequently evaluated once the Commission and the parties have real-world information.

VII. Dispute Resolution Process

The MN DIP dispute process applies to all interconnection customers with less than or equal to 10 MW operating in parallel with the utility grid. The process is broadly applicable to all DER interconnections, including homeowners and developers.

A. Positions of the Parties

1. Xcel Energy

Xcel Energy proposed that mediation be required prior to engaging the Commission following the existing provisions in MN DIP 5.3.1 through 5.3.7. This would be incorporated into a two-track process:

1. Expedited Process. A 10-business day process for non-technical issues (e.g. application portal functions).
2. Regular MN DIP Process. A 43-business day process, with options for mutual extension, for technical and more complex interconnection issues.

Xcel Energy believed that many complaints were part of the system learning process and would decrease over time as more parties became familiar with the interconnection application process.

1. Other Commenters

AES, NES, and MnSEIA opposed the expedited process. They stated that it would not resolve the underlying issues for complaints and would add extra work and create additional delays.

Fresh Energy supported the expedited process for non-technical issues. However, Fresh Energy recommended clarifying that the expedited process would not preclude parties from submitting a complaint to the Commission's Consumer Affairs Office.

As an alternative to Xcel Energy's plan, NES suggested that the independent engineer process be reinstated. The independent engineer would issue a nonbinding decision that could be challenged before the Commission.

2. The Department

The Department supported the proposal to address non-technical issues under the expedited process. The Department noted that any complaint had the ability to slow down the interconnection queue because projects were stayed pending a resolution.

The Department also opposed the suggestion by some other commentors to reinstitute the independent engineer to resolve technical disputes. The Department noted that in the past it was difficult to maintain a list of independent engineers because many worked for either DER developers or the utilities.

B. Commission Action

The Commission appreciates the effort of the parties to find a better process for resolving issues between customers, installers, developers and utilities. Because parties have submitted a variety of solutions with little consensus, the Commission will therefore ask the Distributed Generation Workgroup to develop a proposal for both independent technical review and a queue or policy review process with the goal of reducing complaints or appeals to the Commission. In addition, by involving the Distributed Generation Workgroup, more stakeholders will have an ability to participate.

VIII. Further Reporting Requirements; Stay

If Xcel Energy seeks to recover the cost for distribution upgrades, the Commission will require Xcel Energy to make additional reports of the costs incurred and the technical rationale for each upgrade, as set forth in the ordering paragraphs below.

The Commission will further require Xcel Energy to report on processes developed through the Group Study that the Company ultimately implements with detailed information, also as set forth in the ordering paragraphs below.

The Commission will also stay Xcel Energy's implementation of the Affected System Study Agreement with the Midcontinent Independent System Operator (MISO) and will seek additional input. This stay only applies to implementation of this agreement itself; it does not apply to any other requirements of this order, including deadlines for phasing out the on-hold practice. Given that these projects have already spent significant time in the interconnection queue, the Commission does not intend to further increase that time. Further, the stay does not impact the current MN DIP-approved Affected System Study process used by utilities and MISO.

ORDER

1. Xcel Energy must phase out, for feeders and substations that are not clearly documented as capacity constrained, the "on-hold" practice of staying project timeframes to perform serial review of interconnection applications over the course of a year with quarterly compliance reporting.
2. Within 30 days, Xcel Energy must expand its parallel processing to all fast-track projects, applied only to areas where there are no known capacity constraints.
3. Within 30 days, Xcel Energy must move the trigger to begin reviewing the next-in-queue project when the ahead-in-queue project has begun the facilities study. This is applicable to:
 - a. Projects greater than 40 kilowatts (kW) in areas with no known capacity constraints and
 - b. In-known capacity constraint areas where the project itself would not trigger the applicable known capacity constraint.

4. Xcel Energy must increase tracking and reporting of the following related to the parallel and serial processing of applicants in quarterly Minnesota Distributed Energy Resources Interconnection Process (MN DIP) reports:
 - a. Number of projects 40 kW or smaller and the number that are larger than 40 kW that failed initial review screens, supplemental screens, and required upgrades:
 - i. Per quarter in the year before parallel screening was implemented and
 - ii. Per quarter after parallel screening was implemented;
 - b. Identify/tag applications screened in parallel;
 - c. Additional analysis on the potential impact to interconnection costs of switching to parallel and earlier trigger for serial processing;
 - d. Number and cost of restudies associated with moving serial review for next in queue; and
 - e. Impact on interconnection review timeframes.
5. The Commission grants Xcel Energy a variance to MN DIP 1.8.3 to pilot mandatory group studies for areas with three or more applications greater than 40 kW that cannot be reviewed in parallel.
6. Xcel is required to create and convene a working group, with assistance from Commission staff, to discuss key topics, as follows:
 - a. The Working Group will be conducted over a period of 120 days.
 - b. The Working Group will discuss and file a report with an issues matrix detailing all resolved and unresolved issues, a description of party positions and recommended decision options along with any references to record documentation on topics identified by updated guidelines and in-progress findings from Xcel Energy's mandatory group study project.
7. Xcel Energy must provide the following reporting on any pilot Group Study processes it implements:
 - a. A compliance filing six months after the date of this order describing the participating applications, relevant feeder and substation characteristics, the time in which each phase of the study was completed, any group retention measures (deposits or penalties), the general cost allocation process used, and any disputes that arose; and
 - b. A presentation at the next Solar*Rewards Community stakeholder meeting that follows submission of this report, to be given by Xcel Energy with input from participating applicants about the process and lessons learned.
8. In its quarterly compliance filings in this docket, Xcel Energy must discuss any specific issues that arise as a result of reduced daytime minimum load on feeders with high

distributed energy resources (DER) capacity, or specific issues related to DER and operational flexibility.

9. The Commission denies Xcel Energy's request to edit MN DIP 1.9.1.
10. The Commission approves the cost-sharing proposal for Xcel Energy customers with less than 40 kW DER created by Fresh Energy, IREC, and TruNorth with a plan by Xcel Energy to implement by the end of August 31, 2022, within 60 days of this Order, capping individual upgrades at \$15,000.
11. The Commission requests the Distributed Generation Workgroup propose an independent, unbiased technical review process and a queue or policy review process with the goal of reducing appeals to the Commission.
12. Xcel Energy must provide a detailed report of the costs incurred and technical rationale for each upgrade should Xcel Energy seek cost recovery for distribution upgrades.
13. Xcel Energy must stay implementation of the Affected System Study Agreement until a comment period regarding the following issues has concluded:
 - a. Whether the Agreement between Xcel Energy and the Midcontinent Independent System Operator requires changes to MN DIP or to a tariff;
 - b. What those changes might be;
 - c. Whether any changes to the Agreement should be requested;
 - d. Whether any jurisdictional issues exist; and
 - e. Any other related issues.
14. The Commission requests the Executive Secretary to issue notice of a comment period that addresses key issues.
15. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert
Executive Secretary



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CERTIFICATE OF SERVICE

I, Chrishna Beard, 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
ORDER MODIFYING PRACTICES AND SETTING REPORTING
REQUIREMENTS

Docket Number **E-999/CI-16-521**
Dated this 31st day of March, 2022

/s/ Chrishna Beard

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Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
James	Darabi	james.darabi@solarfarm.com	Solar Farm, LLC	2355 Fairview Ave #101 St. Paul, MN 55113	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Patricia	DeBleekere	tricia.debleeckere@state.mn.us	Public Utilities Commission	121 7th PI E St 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Danielle	DeMarre	danielle.demarre@allenergysolar.com	All Energy Solar	1264 Energy Lane St Paul, MN 55108	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Cheryl	Dietrich	cheryl.dietrich@nexteraenergy.com	NextEra Energy Resources, LLC	700 Universe Blvd E1W/JB Juno Beach, FL 33408	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robin	Doege	Rdoege@stearnslectric.org	Stearns Electric Association	PO Box 40 Melrose, MN 56352-0040	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kristin	Dolan	kdolan@meeker.coop	Meeker Cooperative Light & Power Assn	1725 US Hwy 12 E. Ste 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Renee	Doyle		Doyle Electric Inc.	PO Box 295 Amboy, MN 56010	Paper Service	No	OFF_SL_16-521_Official Service List PUC
John R.	Dunlop, P.E.	JDunlop@RESMinn.com	Renewable Energy Services	Suite 300 448 Morgan Ave. S. Minneapolis, MN 554052030	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Betsy	Engelking	betsy@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John	Farrell	jfarrell@ilsr.org	Institute for Local Self- Reliance	2720 E. 22nd St Institute for Local Self- Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192 Park Rapids, MN 56470	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kornbaum	Frank	fkornbaum@mnpower.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mike	Franklin	mfranklin@mncef.com	MN Conservative Energy Forum	235 E 6th St Fifth Floor St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Katelyn	Frye	kfrye@mnpower.com	Minnesota Power	30 W Superiot St Duluth, MN 558022093	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Nitzan	Goldberger	n.goldberger@energystorage.org	Energy Storage Association	1800 M Street NW Suite 400S Washington, DC 20036	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sarah	Groebner	sgroebner@redwoodelectric.com	Redwood Electric Cooperative	60 Pine St Clements, MN 56224	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Timothy	Gulden	timothy.gulden@yahoo.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cody	Gustafson	cgustafson@mnpower.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tom	Guttormson	Tom.Guttormson@connexusenergy.com	Connexus Energy	14601 Ramsey Blvd Ramsey, MN 55303	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
James	Haler	jhaler@southcentralelectric.com	South Central Electric Association	71176 Tiell Dr P. O. Box 150 St. James, MN 56081	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Donald	Hanson	dfhanson@ieee.org	Solar Photovoltaic Systems	P. O. Box 44579 Eden Prairie, MN 55344	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John	Harlander	john.c.harlander@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ryan	Hentges	ryanh@mvec.net	Minnesota Valley Electric Cooperative	125 Minnesota Valley Electric Dr Jordan, MN 55352	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Dean	Hunter	Dean.Hunter@state.mn.us	Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue Saint Paul, Minnesota 55104	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Chris	Jarosch	chris@carrcreekelectricservice.com	Carr Creek Electric Service, LLC	209 Sommers Street North Hudson, WI 54016	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Jeremiason	bjeremiason@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.	205 W. Hwy. 14 Tyler, MN 56178	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kevin	Joyce	kjoyce@tesla.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Jack	Kegel	jkegel@mmua.org	MMUA	3025 Harbor Lane N Suite 400 Plymouth, MN 55447-5142	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jack	Kluempke	Jack.Kluempke@state.mn.us	Department of Commerce	85 7th Place East Suite 600 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Corrina	Kumpe	ckumpe@mysunshare.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jeffrey L.	Landsman	jlandsman@wheelerlaw.com	Wheeler, Van Sickle & Anderson, S.C.	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn	1725 Highway 12 E Ste 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar	3209 W. 76th St #305 Edina, MN 55435	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200 Wayzata, MN 55391	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Nick	Lenssen	lenssen.nick@gmail.com		1195 Albion Way Boulder, CO 80305	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Amy	Liberkowski	amy.a.liberkowski@xcenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Carl	Linville	clinvill@raponline.org	Regulatory Assistance Project	50 State Street Suite #3 Montpelier, VT 05602	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products	PO Box 108 Springfield, MN 56087	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jody	Londo	jody.l.londo@xcenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
William	Lovelace	wlovelace@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156 Latham, NY 12110-1156	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.	10710 Town Square Dr NE Ste 201 Minneapolis, MN 55449	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200 Minneapolis, MN 55420	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Matthew	Melewski	matthew@nokomisenergy.com	Nokomis Energy LLC & Ole Solar LLC	2639 Nicollet Ave Ste 200 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tim	Mergen	tmergen@meeker.coop	Meeker Cooperative Light And Power	1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Pontius	Mike	mpontius@mnpower.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Luther	Miller	Luther.C.Miller@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dalene	Monsebroten	dalene.monsebroten@nmp agency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Murtaugh	mmurtaugh@fmcs.coop	Freeborn-Mower Cooperative Services	2501 Main Street East Albert Lea, MN 56007	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
David	Niles	david.niles@avantenergy.c om	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Noble	noble@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Rolf	Nordstrom	rnordstrom@gpsid.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Bethany	Owen	bowen@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Cezar	Panait	Cezar.Panait@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company	PO Box 496 215 S. Cascade St. Fergus Falls, MN 565370496	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Susan	Peirce	Susan.Peirce@state.mn.us	Department of Commerce	85 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeff M	Peters	jeff.peters@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, MN 57109-8920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Elizabeth	Psihos	elizabeth.psihos@idealenergies.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Patrick	Quinn	pquinn@GREnergy.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC	3363 Republic Ave Saint Louis Park, MN 55426	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Reinertson	michael.reinertson@avanteenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_16-521_Official Service List PUC
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC	1401 South Broadway Pelican Rapids, MN 56572	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Kenric	Scheevel	Kenric.scheevel@dairylandpower.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, Wisconsin 54602	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
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Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power	1725 US Highway 12 E Suite 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric	22636 US Highway 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Bryant	Tauer	btauer@whe.org	Wright-Hennepin	6800 Electric Dr Rockford, MN 55373	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Peter	Teigland	pteigland@mnseia.org	Minnesota Solar Energy Industries Association	2288 University Ave W Saint Paul, MN 55114	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive P.O. Box 88920 Sioux Falls, SD 57108-8920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC