

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	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.<sup>1</sup> 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),

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<sup>1</sup> 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).<sup>2</sup> 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.

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<sup>2</sup> “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.<sup>3</sup> 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.

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<sup>3</sup> 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.<sup>4</sup>

### **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

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<sup>4</sup> 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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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_16-521_Official Service List PUC
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Curtis	Cordt	ccordt@mvec.net	Minnesota Valley Electric Cooperative	125 Minnesota Valley Electric Drive  Jordan, MN 55352	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kevin	Cray	kevin@communitysolaraccess.org	CCSA	1644 Platte St  Denver, CO 80202	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	5301 32nd Ave S  Grand Forks, ND 58201	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	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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 Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway  Minneapolis, MN 55405	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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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
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Corrina	Kumpe	ckumpe@mysunshare.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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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
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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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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
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_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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Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S  Grand Forks, ND 58201	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
Matthew	Schuerger	matthew.schuerger@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
Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Cooperative Electric	22636 U.S. Hwy. 59  Worthington, MN 56187	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power	1725 US Highway 12 E Suite 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201  St. Paul, MN 55104	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

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Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Assn.	24386 State Hwy. 4, PO Box 529  Sleepy Eye, Minnesota 56085	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies	5810 Nicollet Ave  Minneapolis, Minnesota 55419	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robyn	Sonstegard	robyn.s@northstarelectric.coop	North Star Electric Cooperative, Inc.	PO BOX 719  Baudette, MN 56623	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street  San Francisco, CA 94102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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

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Jeff	Triplett	triplettj@powersystem.org	MREA	10710 Town Square Dr NW St 201 Minneapolis, MN 55449	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric	22636 US Hwy. 59 P.O. Box 788 Worthington, MN 56187-0788	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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John	Williamson	John.Williamson@state.mn.us	Minnesota Department of Labor and Industry	443 Lafayette Rd N  St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Danielle	Winner	danielle.winner@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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