



March 6, 2024

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

RE: Center for Energy and Environment's Reply Comments in the Matter of a Petition by  
CenterPoint Energy for Approval of its First Natural Gas Innovation Plan  
Docket No. G-008/M-23-215

Dear Mr. Seuffert,

Center for Energy and Environment ("CEE") respectfully submits these Reply Comments to the Minnesota Public Utilities Commission ("Commission") in response to parties' Initial Comments filed in the Matter of a Petition by CenterPoint Energy for Approval of its First Natural Gas Innovation Plan.

Several interested parties filed Initial Comments in response to the October 31, 2023 Notice of Extended Comment Period in this docket ("Notice"), including the Office of the Attorney General, the Coalition for Renewable Natural Gas, the Clean Energy Organizations (Fresh Energy, Minnesota Center for Environmental Advocacy, and Sierra Club), Geothermal Exchange Organization ("GeoExchange"), the International Union of Operating Engineers Local 49 ("IUOE Local 49"), the Citizens' Utility Board of Minnesota ("CUB"), the Minnesota Department of Commerce ("Department"), and the City of Minneapolis. We appreciate parties' engagement in this docket and thank parties for their thoughtful comments.

CEE continues to support CenterPoint Energy's proposed 2024-2029 Natural Gas Innovation Plan ("Proposed Plan"), and we recommend Commission approval. The following Reply Comments focus on the energy efficiency and electrification components of the Company's Proposed Plan. In its January 16, 2024 Comments on the Company's Proposed Plan, the Department recommended that the Commission reject certain energy efficiency and electrification pilot proposals, stating that they were more appropriate for the Energy Conservation and Optimization ("ECO") program. Below we describe our perspective and understanding of NGIA eligibility considerations and guidelines for energy conservation and electrification. We then comment on certain specific energy efficiency and electrification pilot proposals included in the Company's Proposed Plan.

## Energy Efficiency and Electrification in NGIA

The NGIA statute defines NGIA-eligible energy efficiency and electrification investments, drawing a distinction from energy efficiency and electrification included in the ECO program:

“Energy efficiency” has the meaning given in section 216B.241, subdivision 1, paragraph (f), but does not include energy conservation investments that the commissioner determines could reasonably be included in a utility’s conservation improvement program.<sup>1</sup>

Strategic electrification does not include investments that the commissioner determines could reasonably be included in the natural gas utility’s conservation improvement program under section 216B.241.<sup>2</sup>

During the regulatory process to develop and establish the greenhouse gas accounting and cost-benefit analysis frameworks for NGIA (Docket Number G999/21-566), the Commission and stakeholders determined that additional guidance to utilities on eligibility of energy efficiency and electrification was warranted. CEE worked with the Department and other interested stakeholders to discuss and develop recommendations for the Commission for how to determine what energy efficiency and electrification investments should be eligible for inclusion in natural gas utility innovation plans.

Parties generally agreed that the types of energy efficiency and electrification that would be appropriate to pursue through NGIA should be above and beyond that which is included in ECO. NGIA’s cost-benefit framework is more flexible and expansive than the cost-effectiveness tests used in ECO, and it places value on making strategic investments today to drive innovation and ratepayer and societal benefits for the future. In contrast, the ECO framework focuses more on enabling and encouraging customers to adopt existing, mature efficient technologies that provide immediate participant, ratepayer, and societal benefits. A program within ECO, the Minnesota Efficient Technology Accelerator (“ETA”), complements these other efforts by systematically identifying and working to eliminate market barriers that cannot be addressed by incentives to accelerate the deployment and reduce the cost of innovative technologies and approaches.<sup>3</sup> While there are some shared objectives and strategies across the three programs – NGIA, ECO, and ETA – CEE believes that these programs are complementary and each play an important role in our state’s energy conservation and electrification efforts. NGIA provides the opportunity to test cutting-edge technologies and approaches that may not be considered cost-

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<sup>1</sup> Minn. Stat. § 216B.2427, subd. 1, paragraph (f).

<sup>2</sup> Minn. Stat. § 216B.2427, subd. 1, paragraph (q).

<sup>3</sup> Minn. Stat. § 216B.241, subd. 14.

effective under the ECO framework but could become so with strategic investment and development through NGIA. ECO provides the venue to broadly deploy innovative technologies and approaches that prove successful and cost-effective through NGIA.

During the stakeholder discussions, CEE and others stressed the importance of considering, not just innovative technologies, but also innovative program design and implementation, when determining the appropriateness of energy efficiency and electrification pilot projects in NGIA. We asserted that it may be appropriate for some NGIA pilot projects to include technologies and measures that are also included or could be included in ECO programs, if those NGIA pilots are using and testing new, innovative and intensive program design approaches.

For instance, while ECO programs have been broadly successful, there are customer groups that have not benefited from ECO programs as much as others. NGIA could offer a venue to develop innovative interventions that target and reach hard-to-reach customers. Additionally, new and innovative technologies with undeveloped markets often require more intensive and expensive program design than more mature technologies. Customers can be hesitant or reluctant to invest in untested or unfamiliar technologies, and there are often few contractors and installers to both correctly install and champion those new technologies. Effective utility programming for new technologies often involves concentrated participant recruitment, higher participant incentives, recruitment and training for contractors and installers, field testing and data collection on equipment performance, and externally facing reports to share the data and findings, all of which may not be possible under the ECO cost-effectiveness framework. Therefore, in deciding whether an energy efficiency or electrification proposal is appropriate for NGIA, we encouraged stakeholders at the time, and continue to encourage stakeholders today, to look beyond whether a particular piece of equipment or technology can be cost-effectively included in ECO and also consider the intensive programming needed to advance a new or emerging technology or approach.

The stakeholder discussions on energy efficiency and electrification eligibility for NGIA ultimately culminated in a broadly supported joint proposal to the Commission. On July 1, 2022, the Department filed Comments on behalf of itself, CEE, Center Point Energy, Xcel Energy, Minnesota Energy Resources Corporation, Greater Minnesota Gas, Fresh Energy, LIUNA Minnesota and North Dakota, Coalition of Renewable Natural Gas, Partnership on Waste and Energy, and the International Operating Engineers Local 49 (collectively “Joint Commenters”) summarizing our recommendations to the Commission. In our recommendations, we focused on the word “investment” within the statutory definition, which could encompass both investments in technologies and investments in innovative programming. The Joint Commenters stated,

We conclude that relying on the term “investments” used in the statutory definition of energy efficiency and strategic

electrification creates flexibility regarding what type of efficiency and electrification programs, measures, or approaches might qualify in the future. At the same time, retaining the Department's authority to determine whether an investment could "reasonably" be included in a utility's CIP portfolio provides a backstop to ensure CIP and NGIA remain two separate frameworks intended to achieve different goals.<sup>4</sup>

On September 8, 2022, the Commission adopted the Joint Commenter's recommendations, codifying flexibility within the determination of eligibility and providing guidance for future utility plans.

To be eligible for inclusion in innovation plans, utilities must:

- a. Demonstrate that proposed energy efficiency and strategic electrification investments are not included in the utility's current conservation improvement program (CIP) Triennial Plan, and state whether the utility does or does not intend to include any of the proposed investments in future CIP Triennial Plans;
- b. For proposed energy efficiency and strategic electrification investments in measures that have been included in past CIP plans, provide historical measure level performance data since 2010; and
- c. Clearly demonstrate why the proposed energy efficiency and strategic electrification investments could not reasonably be included in the utility's conservation improvement program.<sup>5</sup>

We encourage the Commission and the Department to consider the broad and flexible interpretation of "investment" that underlies the Commission's September 12, 2022 Order in evaluating whether CenterPoint Energy's proposed energy efficiency and electrification pilots should be approved through NGIA. While some of the technologies may be eligible for inclusion in ECO, we do not think that the intensive program design, field testing, and market development work proposed by the Company could reasonably be included in ECO or shown to be cost-effective under the ECO framework. We believe that the Company's proposed energy efficiency and electrification pilots are appropriate for the NGIA framework and will provide valuable findings and learnings to Minnesota's overall energy efficiency and electrification efforts.

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<sup>4</sup>Page 4 of the July 1, 2022 Joint Comments by the Department, Center Point Energy, Xcel Energy, Minnesota Energy Resources Corporation, Greater Minnesota Gas, CEE, Fresh Energy, LIUNA Minnesota and North Dakota, Coalition of Renewable Natural Gas, Partnership on Waste and Energy, and the International Operating Engineers Local 49 in Docket Number G999/CI-21-566.

<sup>5</sup> September 12, 2022 Commission Order in Docket Number G999/CI-21-566.

## CenterPoint Energy's Proposed NGIA Pilots

### Pilot L: Industrial Electrification Incentives

The Company's Proposed Plan includes Pilot L, which would study and incentivize electric heat pumps for low-to-medium heat industrial processes. Pilot L includes an initial study phase to better understand the technical potential of electric heat pump technologies for industrial applications and to identify industrial customers that may be served by heat pumps. The Company would then install electric heat pumps at three customer facilities and conduct detailed field testing of the heat pumps' performance. The Company proposed to cover the full cost of the heat pumps and installation.<sup>6</sup>

In initial comments filed on January 15, 2023 in this docket, CEE, the City of Minneapolis, GeoExchange, and CUB indicated support for Pilot L.<sup>7</sup>

In its initial comments, the Department stated:

The NGIA statute clearly states that investments that can be reasonably included in the natural gas utility's Triennial Plan under section 216B.241 should not be included in the NGIA Innovation Plans. Additionally, the Commission's September 12, 2022 Order in the NGIA Framework Docket, states that to be eligible for inclusion in Innovation Plans, the utility must demonstrate that its investments are neither currently included nor can be reasonably included in their Triennial Plans.

Based on the Department's analysis of this pilot, the statutory requirements outlined in the NGIA statute, and the order points contained in the Commissioner's September 12, 2022, Order, the Department concludes that Pilot L is not eligible for inclusion in the Innovation Plan and should be rejected by the Commission.<sup>8</sup>

CEE respectfully disagrees with the Department's conclusion. First, electrification of industrial end-uses is extremely nascent, and individual technologies face significant market barriers to further adoption. In fact, we are not aware of any industrial electrification projects being implemented anywhere in Minnesota, including through the ECO program. While CenterPoint

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<sup>6</sup> Pages 36-38 of Exhibit D of CenterPoint Energy's 2024-2029 Natural Gas Innovation Plan, filed on June 28, 2023 in Docket Number G-008/M-23-215.

<sup>7</sup> Initial Comments filed on January 15, 2024 in Docket Number G-008/M-23-215.

<sup>8</sup> Pages 56-57 of the Department's January 16, 2024 Comments in Docket Number G-008/M-23-215.

Energy included incentives for residential heat pump applications in its latest ECO Plan,<sup>9</sup> it did not include any programs or incentives for industrial heat pump applications in ECO.

We believe that there is significant promise for industrial electrification applications, however, such an emergent approach will require additional investment to demonstrate its applicability, economics, and technical viability before it can be successfully included in largescale ECO programming. Moreover, we believe that this technology and the intensive programming proposed in Pilot L is exactly the type of innovative programming that should be included in NGIA and the type of programming the Commission contemplated in its September 12, 2022 Order in Docket Number G999/CI-21-566. Pilot L includes research, customer recruitment, high customer incentives, and in-depth field testing and measurement of performance. We believe that this intensive programming will be necessary to recruit participants and adequately test this technology, and that this programming would not be cost-effective through ECO.

A recent report by the American Council for an Energy-Efficient Economy (“ACEEE”) reinforces the value that Pilot L could provide toward advancing industrial electrification:

Field-level demonstrations of various [industrial heat pump] types—in multiple industrial applications—are crucial to lowering hurdles, increasing awareness of [industrial heat pump] benefits, and developing diverse workforce to support installations. Broad support and engagement across industry, utilities, agencies, and technology providers is needed to promptly accelerate demonstrations and the learning they provide.<sup>10</sup>

Additionally, the Department noted, “A lack of outreach on behalf of [CenterPoint Energy] to find potential participants for this pilot makes the Department skeptical of the pilot’s chances of success, especially considering other pilots targeting industrial customers where the Company did provide details of customer interest.”<sup>11</sup> CEE agrees with the Department that recruiting participants for this pilot project may be challenging. Industrial electrification is an incipient market and customers could be reluctant to participate. We encourage the Company to invest in targeted and intentional outreach to potential participants. Further, outreach and recruitment for participation in Pilot L may be most effective once the results of the initial study phase are available.

CEE recommends that the Commission approve CenterPoint Energy’s proposed Pilot L to test and develop opportunities and applications for industrial electrification.

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<sup>9</sup> Docket Number G008/CIP-23-95

<sup>10</sup> Rightor, E. et al. (2022). Industrial heat pumps: Electrifying industry’s process heat supply. ACEEE. p. vii.

<sup>11</sup> Page 56 of the Department’s January 16, 2024 Comments in Docket Number G-008/M-23-215.

## Pilot M: Commercial Hybrid Heating

The Company's Proposed Plan includes Pilot M, which would provide support for commercial buildings to replace existing Heating, Ventilation, and Air Conditioning ("HVAC") systems with hybrid systems that combine electric heat pumps with a natural gas backup heating source.<sup>12</sup>

In initial comments in this docket, CEE, the City of Minneapolis, GeoExchange, and CUB indicated support for Pilot M.<sup>13</sup>

The Department stated in its January 16, 2024 Comments to this docket, "[Pilot M] would be a better fit for the Company's ECO Plan due to the statutory threshold regarding the classification of projects between ECO and NGIA."<sup>14</sup> The Department explained, "[B]ecause similar measures are being bundled and provided by other utilities and the fact that the vendor explained that the overall package of measures will be cost-effective, the Department concludes that [CenterPoint Energy] has not clearly demonstrated why these measures could not be reasonably included in its 2024-2026 ECO portfolio."<sup>15</sup> Therefore, the Department concluded that Pilot M should not be eligible for inclusion in NGIA and recommended that the Commission reject Pilot M.<sup>16</sup>

CEE respectfully disagrees with the Department's conclusion related to the eligibility and appropriateness of Pilot M in CenterPoint Energy's NGIA portfolio. While hybrid heating systems – electric air source heat pumps paired with a natural gas back-up heating source – are increasingly common in the residential sector, hybrid heating systems are still uncommon in commercial settings. CenterPoint Energy's approved 2024-2026 ECO Triennial Plan does not include incentives for commercial hybrid heating equipment or systems. The Company noted that such systems could be incentivized through its custom efficient fuel switching rebate program, but that commercial hybrid heating incentives were not included as a prescriptive offering because they were not cost-effective under the ECO cost-effectiveness framework.<sup>17</sup>

While it may be true that bundling commercial hybrid heating systems with other cost-effective measures could allow a broader program to be cost-effective under the ECO framework, we do not believe that should disqualify the measure from inclusion in NGIA. As with industrial electrification, hybrid heating systems in commercial buildings are rare. Customers are often reluctant to invest in the technology and contractors can be reluctant to recommend the technology due to a lack of familiarity and information. Therefore, even if there were ECO

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<sup>12</sup> Pages 39-42 of Exhibit D of CenterPoint Energy's 2024-2029 Natural Gas Innovation Plan, filed on June 28, 2023 in Docket Number G-008/M-23-215.

<sup>13</sup> Initial Comments filed in Docket Number G-008/M-23-215.

<sup>14</sup> Page 5 of the Department's January 16, 2023 Comments in Docket Number G-008/M-23-215.

<sup>15</sup> Page 57 of the Department's January 16, 2023 Comments in Docket Number G-008/M-23-215.

<sup>16</sup> Page 57 of the Department's January 16, 2023 Comments in Docket Number G-008/M-23-215.

<sup>17</sup> Page 57 of the Department's January 16, 2023 Comments in Docket Number G-008/M-23-215.

incentives for commercial hybrid heating systems, that alone is not likely to move the market, as commercial hybrid systems face significant market barriers.

Nonetheless, hybrid space heating systems will be a critical tool in reducing emissions associated with natural gas consumption in commercial buildings. Pilot M would help to advance this important technology by providing intensive customer outreach, attractive customer incentives, technical support, custom energy savings estimates, high-quality installations, and product performance data.

Moreover, Pilot M would support and expand upon work being done through the ETA program to accelerate the availability of high-performance, dual fuel rooftop units (“RTUs”) for commercial applications. The ETA does not provide any customer incentives, but rather addresses additional market barriers in a manner complementary to the NGIA pilot. ETA activities related to high-performance RTUs includes:

- Conducting research and pilot studies in partnership with manufacturers, distributors, contractors, and building decision makers.
- Partnering with manufacturers and distributors to learn about their approaches to RTU technology and provide market information and resources.
- Working with contractors to understand their needs and provide support by offering tools/resources and training opportunities.
- Providing educational resources and tools for building owners and decision-makers to help them understand efficient RTU technologies and make the most of their benefits.

Pilot M would supplement this work by providing opportunities to monitor product performance in the field and collect and share data with utilities, contractors, and other relevant stakeholders.

CEE believes that the Company’s proposed Pilot M is an appropriate project for NGIA, and we recommend that the Commission approve Pilot M to test and foster emerging commercial hybrid heating technologies and applications.

#### Pilot N: Residential Deep Energy Retrofits and Electric Air Source Heat Pumps

The Company’s Proposed Plan includes Pilot N, which proposes a three-phase pilot program to test a combination of deep energy retrofits and air-source electric heat pumps with a natural gas back-up heating source in a variety of residential building types.<sup>18</sup> Pilot N is designed to satisfy the statutory requirement that CenterPoint Energy include a pilot program that facilitates deep

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<sup>18</sup> Page 42 of Exhibit D of CenterPoint Energy’s 2024-2029 Natural Gas Innovation Plan, filed on June 28, 2023 in Docket Number G-008/M-23-215.



energy retrofits and the installation of cold climate electric air-source heat pumps in existing residential homes in the Company's first NGIA plan.<sup>19</sup>

In initial comments in this docket, CEE, the City of Minneapolis, CUB, and the Clean Energy Organizations recommended approval of Pilot N.<sup>20</sup>

In its January 16, 2024 Comments, the Department also recommended approval of the proposed Pilot N, but recommended a reduction to the Company's filed goals and budget. The Department reviewed proposals the Company received in response to a Request for Ideas ("RFI") for Pilot N and noticed that the Company's proposed goals and budget for Pilot N were higher than the budget and goals included in RFI responses. The Department stated, "[CenterPoint Energy's] pilot proposal, which was supposedly based on these RFIs, included more than double the number of participants and a substantially higher budget."<sup>21</sup> The Department therefore recommended the Commission approve a lower budget than was included in the Proposed Plan, stating, "Keeping the program budget within the bounds of what the RFI respondents submitted allows us to create realistic cost estimates that are achievable."<sup>22</sup>

CEE is one of the vendors that provided a proposal for Pilot N during the Company's RFI process. We acknowledge that our proposed participation and budget targets were lower than those included in the Company's Proposed Plan. However, we support the participation goals and budget included in the Company's Proposed Plan for Pilot N. We did not conduct a rigorous assessment of the market potential for Pilot N when developing our proposal. We believe that the Company's proposed participation goal, of 140 buildings with a \$5.5 million budget by year five,<sup>23</sup> is attainable through the Company's proposal.

CEE recommends that the Commission approve Pilot N as proposed by the Company in its Proposed Plan.

### Conclusion

Pilots L, M, and N are important and appropriate pilots for inclusion in CenterPoint Energy's first NGIA plan. Although some technologies may overlap with those included in ECO, each proposed pilot is innovative and will require more intensive programming than typically pursued through ECO, including higher customer incentives, field testing, market development, and intensive program outreach and recruitment. As such, CEE strongly recommends that the Commission

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<sup>19</sup> Minnesota Statute § 216B.2427 Subd. 8.

<sup>20</sup> Initial Comments filed in Docket Number G-008/M-23-215.

<sup>21</sup> Page 58 of the Department's January 16, 2023 Comments in Docket Number G-008/M-23-215.

<sup>22</sup> Page 58 of the Department's January 16, 2023 Comments in Docket Number G-008/M-23-215.

<sup>23</sup> Page 113 of of CenterPoint Energy's 2024-2029 Natural Gas Innovation Plan, filed on June 28, 2023 in Docket Number G-008/M-23-215.

approve the Company's proposed Pilots L, M, and N for inclusion in CenterPoint Energy's 2024-2029 Natural Gas Innovation Plan.

Thank you for considering our comments. Please contact me at [apartridge@mncee.org](mailto:apartridge@mncee.org) with any questions.

Sincerely,

/s/ Audrey Partridge  
Director of Regulatory  
Center for Energy and Environment

**AFFIDAVIT OF SERVICE**

**DOCKET NUMBER G008/M-23-215**

I, Sachiko Graber, hereby certify that on this 6<sup>th</sup> day of March 2024, I served Center for Energy and Environment's Reply Comments on CenterPoint Energy's Natural Gas Innovation Act Plan in Docket Number G008/M-23-215 on the following persons on the attached Service Lists by:

X placing such filing in envelopes, properly addressed, and depositing the same in the Post Office at the City of Minneapolis, for delivery by the United States Post Office as directed by said envelopes.

X electronic filing

/s/ Sachiko Graber

Sachiko Graber

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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<br><br>St. Paul,<br>MN<br>55101                  | Electronic Service | Yes               | OFF_SL_23-215_Official |
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| James      | Denniston      | james.r.denniston@xcelenergy.com     | Xcel Energy Services, Inc.          | 414 Nicollet Mall, 401-8<br><br>Minneapolis,<br>MN<br>55401                         | Electronic Service | No                | OFF_SL_23-215_Official |
| Ryan       | Dougherty      | ryan@geoexchange.org                 | Geothermal Exchange Organization    | 312 S 4th St Ste 100<br><br>SPRINGFIELD,<br>IL<br>62701                             | Electronic Service | No                | OFF_SL_23-215_Official |
| J.         | Drake Hamilton | hamilton@fresh-energy.org            | Fresh Energy                        | 408 St Peter St Ste 350<br><br>Saint Paul,<br>MN<br>55101                           | Electronic Service | No                | OFF_SL_23-215_Official |
| Brian      | Edstrom        | briane@cupminnesota.org              | Citizens Utility Board of Minnesota | 332 Minnesota St<br>Ste W1360<br>Saint Paul,<br>MN<br>55101                         | Electronic Service | No                | OFF_SL_23-215_Official |
| John       | Farrell        | jfarrell@ilsr.org                    | Institute for Local Self-Reliance   | 2720 E. 22nd St<br>Institute for Local Self-Reliance<br>Minneapolis,<br>MN<br>55406 | Electronic Service | No                | OFF_SL_23-215_Official |
| Sharon     | Ferguson       | sharon.ferguson@state.mn.us          | Department of Commerce              | 85 7th Place E Ste 280<br><br>Saint Paul,<br>MN<br>551012198                        | Electronic Service | No                | OFF_SL_23-215_Official |

| First Name | Last Name  | Email                                    | Company Name  | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|------------|------------|--|---|--|--------------------|-------------------|------------------------|
| Mike       | Fiterman   | mikefiterman@libertydiversified.com      | Liberty Diversified International                         | 5600 N Highway 169<br>Minneapolis, MN<br>55428-3096                  | Electronic Service | No                | OFF_SL_23-215_Official |
| Lucas      | Franco     | lfranco@liunagro.com                     | LIUNA   | 81 Little Canada Rd E<br>Little Canada, MN<br>55117                  | Electronic Service | No                | OFF_SL_23-215_Official |
| Amy        | Fredregill | afredregill@environmental-initiative.org | Environmental Initiative, MN Sustainable Growth Coalition | 211 First St N Ste 250<br>Minneapolis, MN<br>55401                   | Electronic Service | No                | OFF_SL_23-215_Official |
| Daryll     | Fuentes    | energy@usg.com                           | USG Corporation   | 550 W Adams St<br>Chicago, IL<br>60661                               | Electronic Service | No                | OFF_SL_23-215_Official |
| BEAU       | GRIFFEY    | bgriffey@id8energy.com                   | iD8 Energy Group, LLC                                     | 1799 County Rd 90 N<br>Maple Plain, MN<br>55395                      | Electronic Service | No                | OFF_SL_23-215_Official |
| Edward     | Garvey     | garveyed@aol.com                         | Residence   | 32 Lawton St<br>Saint Paul, MN<br>55102                              | Electronic Service | No                | OFF_SL_23-215_Official |
| Edward     | Garvey     | edward.garvey@AESLconsulting.com         | AESL Consulting   | 32 Lawton St<br>Saint Paul, MN<br>55102-2617                         | Electronic Service | No                | OFF_SL_23-215_Official |
| Debbie     | Goettel    | Debbie.Goettel@hennepin.us               | Partnership on Waste and Energy                           | 2785 White Bear Ave N Ste 350<br>Maplewood, MN<br>55109              | Electronic Service | No                | OFF_SL_23-215_Official |
| Todd J.    | Guerrero   | todd.guerrero@kutakrock.com              | Kutak Rock LLP  | Suite 1750<br>220 South Sixth Street<br>Minneapolis, MN<br>554021425 | Electronic Service | No                | OFF_SL_23-215_Official |
| Matthew B  | Harris     | matt.b.harris@xcelenergy.com             | XCEL ENERGY   | 401 Nicollet Mall FL 8<br>Minneapolis, MN<br>55401                   | Electronic Service | No                | OFF_SL_23-215_Official |



| First Name | Last Name      | Email                                   | Company Name                     | Address   | Delivery Method    | View Trade Secret | Service List Name      |
|------------|----------------|---|----------------------------------|---|--------------------|-------------------|------------------------|
| Kim        | Havey          | kim.havey@minneapolismn.gov             | City of Minneapolis              | 350 South 5th Street,<br>Suite 315M<br>Minneapolis,<br>MN<br>55415              | Electronic Service | No                | OFF_SL_23-215_Official |
| Philip     | Hayet          | phayet@jkenn.com                        | J. Kennedy and Associates, Inc.  | 570 Colonial Park Drive<br>Suite 305<br>Roswell,<br>GA<br>30075-3770            | Electronic Service | No                | OFF_SL_23-215_Official |
| Adam       | Heinen         | aheinen@dakotaelectric.com              | Dakota Electric Association      | 4300 220th St W<br><br>Farmington,<br>MN<br>55024                               | Electronic Service | No                | OFF_SL_23-215_Official |
| Mike       | Henchen        | mhenchen@rmi.org                        | Rocky Mountain Institute (RMI)   | N/A   | Electronic Service | No                | OFF_SL_23-215_Official |
| Annete     | Henkel         | mui@mutilityinvestors.org               | Minnesota Utility Investors      | 413 Wacouta Street<br>#230<br>St.Paul,<br>MN<br>55101                           | Electronic Service | No                | OFF_SL_23-215_Official |
| Joylyn C   | Hoffman Malueg | Joylyn.hoffmanmalueg@wecenergygroup.com | Minnesota Energy Resources       | 2685 145th St W<br><br>Rosemount,<br>MN<br>55068                                | Electronic Service | No                | OFF_SL_23-215_Official |
| Michael    | Hoppe          | lu23@ibew23.org                         | Local Union 23, I.B.E.W.         | 445 Etna Street<br>Ste. 61<br>St. Paul,<br>MN<br>55106                          | Electronic Service | No                | OFF_SL_23-215_Official |
| Emma       | Ingebretson    | Emma.Ingebretsen@centerpointenergy.com  | CenterPoint Energy               | 505 Nicollet Mall<br>PO Box 59038<br>Minneapolis,<br>MN<br>55402                | Electronic Service | Yes               | OFF_SL_23-215_Official |
| Travis     | Jacobson       | travis.jacobson@mdu.com                 | Great Plains Natural Gas Company | 400 N 4th St<br><br>Bismarck,<br>ND<br>58501                                    | Electronic Service | No                | OFF_SL_23-215_Official |
| John       | Jaimez         | john.jaimez@hennepin.us                 | Hennepin County Public Works     | Environment & Energy Department<br>701 4th Ave S<br>Minneapolis,<br>MN<br>55415 | Electronic Service | No                | OFF_SL_23-215_Official |

| First Name | Last Name        | Email                         | Company Name  | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|------------|------------------|-------------------------------|---|--|--------------------|-------------------|------------------------|
| Alan       | Jenkins          | aj@jenkinsatlaw.com           | Jenkins at Law  | 2950 Yellowtail Ave.<br><br>Marathon,<br>FL<br>33050               | Electronic Service | No                | OFF_SL_23-215_Official |
| Richard    | Johnson          | Rick.Johnson@lawmoss.com      | Moss & Barnett  | 150 S. 5th Street<br>Suite 1200<br>Minneapolis,<br>MN<br>55402     | Electronic Service | No                | OFF_SL_23-215_Official |
| Sarah      | Johnson Phillips | sarah.phillips@stoel.com      | Stoel Rives LLP   | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No                | OFF_SL_23-215_Official |
| Brendan    | Jordan           | bjordan@gpisd.net             | Great Plains Institute &<br>Bioeconomy Coalition of<br>MN | 2801 21st Ave S Ste 220<br><br>Minneapolis,<br>MN<br>55407         | Electronic Service | No                | OFF_SL_23-215_Official |
| Cliff      | Kaehler          | cliff.kaehler@novelenergy.biz | Novel Energy Solutions<br>LLC                             | 4710 Blaylock Way<br><br>Inver Grove Heights,<br>MN<br>55076       | Electronic Service | No                | OFF_SL_23-215_Official |
| David      | Kailbourne       | EDK@REVLNG.COM                | REV LNG, LLC  | 1002 Empson Rd<br><br>Ulysses,<br>PA<br>16948                      | Electronic Service | No                | OFF_SL_23-215_Official |
| D          | Kalmon           | dkalmon@mwm.org               | Mississippi Watershed<br>Management Organization          | 2522 Marshall St NE<br><br>Minneapolis,<br>MN<br>55418-3329        | Electronic Service | No                | OFF_SL_23-215_Official |
| William D  | Kenworthy        | will@votesolar.org            | Vote Solar  | 332 S Michigan Ave FL 9<br><br>Chicago,<br>IL<br>60604             | Electronic Service | No                | OFF_SL_23-215_Official |
| Samuel B.  | Ketchum          | sketchum@kennedy-graven.com   | Kennedy & Graven,<br>Chartered                            | 150 S 5th St<br>Ste 700<br>Minneapolis,<br>MN<br>55402             | Electronic Service | No                | OFF_SL_23-215_Official |
| Frank      | Kohlasch         | frank.kohlasch@state.mn.us    | MN Pollution Control<br>Agency                            | 520 Lafayette Rd N.<br><br>St. Paul,<br>MN<br>55155                | Electronic Service | No                | OFF_SL_23-215_Official |

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| Kyle R.    | Kroll     | kkroll@winthrop.com                | Winthrop & Weinstine, P.A.                                 | 225 South Sixth Street<br>Suite 3500<br>Minneapolis,<br>MN<br>55402   | Electronic Service | No                | OFF_SL_23-215_Official |
| Nicolle    | Kupser    | nkupser@greatermngas.com           | Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC | 1900 Cardinal Ln<br>PO Box 798<br>Faribault,<br>MN<br>55021           | Electronic Service | No                | OFF_SL_23-215_Official |
| Brenda     | Kyle      | bkyle@stpaulchamber.com            | St. Paul Area Chamber of Commerce                          | 401 N Robert Street<br>Suite 150<br>St Paul,<br>MN<br>55101           | Electronic Service | No                | OFF_SL_23-215_Official |
| Carmel     | Laney     | carmel.laney@stoel.com             | Stoel Rives LLP  | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402    | Electronic Service | No                | OFF_SL_23-215_Official |
| Betsy      | Lang      | betsy.lang@centerpointenergy.com   | CenterPoint Energy Minnesota Gas                           | 505 Nicollet Ave Mall, 3rd Floor<br><br>Minneapolis,<br>MN<br>55402   | Electronic Service | Yes               | OFF_SL_23-215_Official |
| Peder      | Larson    | plarson@larkinhoffman.com          | Larkin Hoffman Daly & Lindgren, Ltd.                       | 8300 Norman Center Drive<br>Suite 1000<br>Bloomington,<br>MN<br>55437 | Electronic Service | No                | OFF_SL_23-215_Official |
| Samuel     | Lehr      | sam.lehr@rngcoalition.com          | Coalition for Renewable Natural Gas                        | 1017 L St #513<br><br>Sacramento,<br>CA<br>95814                      | Electronic Service | No                | OFF_SL_23-215_Official |
| Robert     | Lems      | administration@dm-cgs.com          | DMT Clear Gas Solutions                                    | 19125 SW 125th Ct<br><br>Tualatin,<br>OR<br>97062                     | Electronic Service | No                | OFF_SL_23-215_Official |
| Rachel     | Leonard   | rachel.leonard@ci.monticello.mn.us | City of Monticello   | 505 Walnut St Ste 1<br><br>Monticello,<br>MN<br>55362                 | Electronic Service | No                | OFF_SL_23-215_Official |
|            |           |                                    |  |   |                    |                   |                        |

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| Annie      | Levenson Falk | annief@cupminnesota.org          | Citizens Utility Board of Minnesota         | 332 Minnesota Street,<br>Suite W1360<br><br>St. Paul,<br>MN<br>55101 | Electronic Service | No                | OFF_SL_23-215_Official |
| Amy        | Liberkowski   | amy.a.liberkowski@xcelenergy.com | Xcel Energy                                 | 414 Nicollet Mall<br>7th Floor<br>Minneapolis,<br>MN<br>554011993    | Electronic Service | No                | OFF_SL_23-215_Official |
| Eric       | Lipman        | eric.lipman@state.mn.us          | Office of Administrative Hearings           | PO Box 64620<br><br>St. Paul,<br>MN<br>551640620                     | Electronic Service | No                | OFF_SL_23-215_Official |
| Jason      | Loos          | jason.loos@centerpointenergy.com | CenterPoint Energy Resources Corp.          | 505 Nicollet Mall<br>3rd Floor<br>Minneapolis,<br>MN<br>55402        | Electronic Service | Yes               | OFF_SL_23-215_Official |
| Kavita     | Maini         | kmmaini@wi.rr.com                | KM Energy Consulting, LLC                   | 961 N Lost Woods Rd<br><br>Oconomowoc,<br>WI<br>53066                | Electronic Service | No                | OFF_SL_23-215_Official |
| Pam        | Marshall      | pam@energycents.org              | Energy CENTS Coalition                      | 823 E 7th St<br><br>St Paul,<br>MN<br>55106                          | Electronic Service | No                | OFF_SL_23-215_Official |
| Emily      | Marshall      | emarshall@mojlaw.com             | Miller O'Brien Jensen, PA                   | 120 S. 6th Street<br>Suite 2400<br>Minneapolis,<br>MN<br>55402       | Electronic Service | No                | OFF_SL_23-215_Official |
| Nicholas   | Martin        | nicholas.f.martin@xcelenergy.com | Xcel Energy                                 | 414 Nicollet Mall<br>7th floor<br>Minneapolis,<br>MN<br>55401        | Electronic Service | No                | OFF_SL_23-215_Official |
| Linda      | Martinez      | lmartinez@auri.org               | Agricultural Utilization Research Institute | N/A  | Electronic Service | No                | OFF_SL_23-215_Official |
| Mary       | Martinka      | mary.a.martinka@xcelenergy.com   | Xcel Energy Inc                             | 414 Nicollet Mall<br>7th Floor<br>Minneapolis,<br>MN<br>55401        | Electronic Service | No                | OFF_SL_23-215_Official |

| First Name | Last Name  | Email                          | Company Name                                | Address   | Delivery Method    | View Trade Secret | Service List Name      |
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| Daryl      | Maxwell    | dmaxwell@hydro.mb.ca           | Manitoba Hydro                              | 360 Portage Ave FL 16<br>PO Box 815, Station Main<br>Winnipeg,<br>MB<br>R3C 2P4<br><br>CANADA | Electronic Service | No                | OFF_SL_23-215_Official |
| Taylor     | McNair     | taylor@gridlab.org             |   | 668 Capp Street<br><br>San Francisco,<br>CA<br>94110  | Electronic Service | No                | OFF_SL_23-215_Official |
| Sarah      | Mead       | sarah.mead@wecenergygroup.com  | MERC  | N/A   | Electronic Service | No                | OFF_SL_23-215_Official |
| Matthew    | Melewski   | matthew@nokomisenergy.com      | Nokomis Energy LLC & Ole Solar LLC          | 2639 Nicollet Ave Ste 200<br><br>Minneapolis,<br>MN<br>55408                                  | Electronic Service | No                | OFF_SL_23-215_Official |
| Joseph     | Meyer      | joseph.meyer@ag.state.mn.us    | Office of the Attorney General-RUD          | Bremer Tower, Suite 1400<br>445 Minnesota Street<br>St Paul,<br>MN<br>55101-2131              | Electronic Service | No                | OFF_SL_23-215_Official |
| Ana Sophia | Mifsud     | amifsud@rmi.org                | Rocky Mountain Institute (RMI)              | N/A   | Electronic Service | No                | OFF_SL_23-215_Official |
| Stacy      | Miller     | stacy.miller@minneapolismn.gov | City of Minneapolis                         | 350 S. 5th Street<br>Room M 301<br>Minneapolis,<br>MN<br>55415                                | Electronic Service | No                | OFF_SL_23-215_Official |
| David      | Moeller    | dmoeller@allete.com            | Minnesota Power                             | 30 W Superior St<br><br>Duluth,<br>MN<br>558022093  | Electronic Service | No                | OFF_SL_23-215_Official |
| Andrew     | Moratzka   | andrew.moratzka@stoel.com      | Stoel Rives LLP                             | 33 South Sixth St Ste 4200<br><br>Minneapolis,<br>MN<br>55402                                 | Electronic Service | No                | OFF_SL_23-215_Official |
| Evan       | Mulholland | emulholland@mncenter.org       | Minnesota Center for Environmental Advocacy | 1919 University Ave W Ste 515<br><br>Saint Paul,<br>MN<br>55101                               | Electronic Service | No                | OFF_SL_23-215_Official |

| First Name | Last Name    | Email                            | Company Name   | Address   | Delivery Method    | View Trade Secret | Service List Name      |
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| Alan       | Muller       | alan@greendel.org                | Energy & Environmental Consulting                          | 1110 West Avenue<br>Red Wing,<br>MN<br>55066                        | Electronic Service | No                | OFF_SL_23-215_Official |
| Carl       | Nelson       | cnelson@mncee.org                | Center for Energy and Environment                          | 212 3rd Ave N Ste 560<br>Minneapolis,<br>MN<br>55401                | Electronic Service | No                | OFF_SL_23-215_Official |
| David      | Niles        | david.niles@avantenergy.com      | Minnesota Municipal Power Agency                           | 220 South Sixth Street<br>Suite 1300<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No                | OFF_SL_23-215_Official |
| Samantha   | Norris       | samanthanorris@alliantenergy.com | Interstate Power and Light Company                         | 200 1st Street SE PO Box 351<br>Cedar Rapids,<br>IA<br>524060351    | Electronic Service | No                | OFF_SL_23-215_Official |
| M. William | O'Brien      | bobrien@mojlaw.com               | Miller O'Brien Jensen, P.A.                                | 120 S 6th St Ste 2400<br>Minneapolis,<br>MN<br>55402                | Electronic Service | No                | OFF_SL_23-215_Official |
| Ric        | O'Connell    | ric@gridlab.org                  | GridLab  | 2120 University Ave<br>Berkeley,<br>CA<br>94704                     | Electronic Service | No                | OFF_SL_23-215_Official |
| Logan      | O'Grady      | logrady@mnseia.org               | Minnesota Solar Energy Industries Association              | 2288 University Ave W<br>St. Paul,<br>MN<br>55114                   | Electronic Service | No                | OFF_SL_23-215_Official |
| Carol A.   | Overland     | overland@legalelectric.org       | Legalelectric - Overland Law Office                        | 1110 West Avenue<br>Red Wing,<br>MN<br>55066                        | Electronic Service | No                | OFF_SL_23-215_Official |
| Greg       | Palmer       | gpalmer@greatermngas.com         | Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC | 1900 Cardinal Ln<br>PO Box 798<br>Faribault,<br>MN<br>55021         | Electronic Service | No                | OFF_SL_23-215_Official |
| Jessica    | Palmer Denig | jessica.palmer-Denig@state.mn.us | Office of Administrative Hearings                          | 600 Robert St N<br>PO Box 64620<br>St. Paul,<br>MN<br>55164         | Electronic Service | No                | OFF_SL_23-215_Official |

| First Name | Last Name  | Email                                 | Company Name                                | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|------------|------------|---------------------------------------|---|--|--------------------|-------------------|------------------------|
| Antonio    | Parisi     | aparisi@sacyr.com                     | Sacyr Environment USA LLC                   | 3330 Washington Blvd<br>Ste 400<br>Arlington,<br>VA<br>22201         | Electronic Service | No                | OFF_SL_23-215_Official |
| Melissa    | Partin     | mpartin@mncenter.org                  | Minnesota Center for Environmental Advocacy | 1943 Princeton Ave<br><br>St Paul,<br>MN<br>55105                    | Electronic Service | No                | OFF_SL_23-215_Official |
| Audrey     | Partridge  | apartridge@mncee.org                  | Center for Energy and Environment           | 212 3rd Ave. N. Suite 560<br><br>Minneapolis,<br>MN<br>55401         | Electronic Service | No                | OFF_SL_23-215_Official |
| Dean       | Pawlowski  | dpawlowski@otpc.com                   | Otter Tail Power Company                    | PO Box 496<br>215 S. Cascade St.<br>Fergus Falls,<br>MN<br>565370496 | Electronic Service | No                | OFF_SL_23-215_Official |
| Lisa       | Peterson   | lisa.r.peterson@xcelenergy.com        | Xcel Energy                                 | 414 Nicollet Mall FL 7<br><br>Minneapolis,<br>MN<br>55401            | Electronic Service | No                | OFF_SL_23-215_Official |
| Catherine  | Phillips   | Catherine.Phillips@wecenergygroup.com | Minnesota Energy Resources                  | 231 West Michigan St<br><br>Milwaukee,<br>WI<br>53203                | Electronic Service | No                | OFF_SL_23-215_Official |
| J. Gregory | Porter     | greg.porter@nngco.com                 | Northern Natural Gas Company                | 1111 South 103rd St<br><br>Omaha,<br>NE<br>68124                     | Electronic Service | No                | OFF_SL_23-215_Official |
| Kevin      | Pranis     | kpranis@liunagro.com                  | Laborers' District Council of MN and ND     | 81 E Little Canada Road<br><br>St. Paul,<br>MN<br>55117              | Electronic Service | No                | OFF_SL_23-215_Official |
| Greg       | Pruszinske | gpruszinske@ci.becker.mn.us           | City of Becker                              | PO Box 250<br>12060 Sherburne Ave<br>Becker,<br>MN<br>55308          | Electronic Service | No                | OFF_SL_23-215_Official |
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| Victoria       | Reinhardt                      | Victoria.Reinhardt@co.ramsey.mn.us   | Partnership on Waste and Energy                     | Ramsey County Board Office<br>15 W. Kellogg Blvd., Ste. 220<br>St. Paul, MN 55102 | Electronic Service | No                | OFF_SL_23-215_Official |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD                  | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul, MN 55102131                       | Electronic Service | Yes               | OFF_SL_23-215_Official |
| Kevin          | Reuther                        | kreuther@mncenter.org                | MN Center for Environmental Advocacy                | 26 E Exchange St, Ste 206<br><br>St. Paul, MN 551011667                           | Electronic Service | No                | OFF_SL_23-215_Official |
| Nathaniel      | Runke                          | nrunke@local49.org                   | International Union of Operating Engineers Local 49 | 611 28th St. NW<br><br>Rochester, MN 55901  | Electronic Service | No                | OFF_SL_23-215_Official |
| Bjorgvin       | Saevarsson                     | bjorgvin@yorthgroup.com              | Yorth   | 500 East Grant Street 1207<br><br>#1207<br>Minneapolis, MN 55404                  | Electronic Service | No                | OFF_SL_23-215_Official |
| Kevin          | Saville                        | kevin.saville@ftr.com                | Citizens/Frontier Communications                    | 2378 Wilshire Blvd.<br><br>Mound, MN 55364  | Electronic Service | No                | OFF_SL_23-215_Official |
| Elizabeth      | Schmiesing                     | eschmiesing@winthrop.com             | Winthrop & Weinstine, P.A.                          | 225 South Sixth Street<br>Suite 3500<br>Minneapolis, MN 55402                     | Electronic Service | No                | OFF_SL_23-215_Official |
| Peter          | Scholtz                        | peter.scholtz@ag.state.mn.us         | Office of the Attorney General-RUD                  | Suite 1400<br>445 Minnesota Street<br>St. Paul, MN 55101-2131                     | Electronic Service | No                | OFF_SL_23-215_Official |
| Christine      | Schwartz                       | Regulatory.records@xcelenergy.com    | Xcel Energy   | 414 Nicollet Mall FL 7<br><br>Minneapolis, MN 554011993                           | Electronic Service | No                | OFF_SL_23-215_Official |



| First Name | Last Name      | Email                                | Company Name                           | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|------------|----------------|--------------------------------------|--|--|--------------------|-------------------|------------------------|
| Douglas    | Seaton         | doug.seaton@umwlc.org                | Upper Midwest Law Center               | 8421 Wayzata Blvd Ste 300<br><br>Golden Valley,<br>MN<br>55426     | Electronic Service | No                | OFF_SL_23-215_Official |
| Patrick    | Serfass        | pserfass@tccorp.com                  | American Biogas Council                | 1211 Connecticut Ave NW<br>Ste 650<br>Washington,<br>DC<br>20036   | Electronic Service | No                | OFF_SL_23-215_Official |
| Patrick    | Serfass        | info@americanbiogascouncil.org       | American Biogas Council                | 1211 Connecticut Ave NW<br>Ste 650<br>Washington,<br>DC<br>20036   | Electronic Service | No                | OFF_SL_23-215_Official |
| Will       | Seuffert       | Will.Seuffert@state.mn.us            | Public Utilities Commission            | 121 7th PI E Ste 350<br><br>Saint Paul,<br>MN<br>55101             | Electronic Service | Yes               | OFF_SL_23-215_Official |
| Janet      | Shaddix Elling | jshaddix@janetshaddix.com            | Shaddix And Associates                 | 7400 Lyndale Ave S Ste 190<br><br>Richfield,<br>MN<br>55423        | Electronic Service | No                | OFF_SL_23-215_Official |
| David      | Shaffer        | david.shaffer@novelenergy.biz        | Novel Energy Solutions                 | 2303 Wycliff St Ste 300<br><br>St. Paul,<br>MN<br>55114            | Electronic Service | No                | OFF_SL_23-215_Official |
| Andrew R.  | Shedlock       | Andrew.Shedlock@KutakRock.com        | Kutak Rock LLP                         | 60 South Sixth St Ste 3400<br><br>Minneapolis,<br>MN<br>55402-4018 | Electronic Service | No                | OFF_SL_23-215_Official |
| Colleen    | Sipiorski      | Colleen.Sipiorski@wecenergygroup.com | Minnesota Energy Resources Corporation | 700 North Adams St<br><br>Green Bay,<br>WI<br>54307                | Electronic Service | No                | OFF_SL_23-215_Official |
| Edyta      | Sitko          | esitko@ucsusa.org                    | Union of Concerned Scientists          | 1 N Lasalle Ave<br><br>CHICAGO,<br>IL<br>60602                     | Electronic Service | No                | OFF_SL_23-215_Official |
|            |                |                                      |  |  |                    |                   |                        |

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|------------|-----------|-----------------------------------|--|---|--------------------|-------------------|------------------------|
| Joshua     | Smith     | joshua.smith@sierraclub.org       |  | 85 Second St FL 2<br><br>San Francisco,<br>CA<br>94105            | Electronic Service | No                | OFF_SL_23-215_Official |
| Beth       | Smith     | bsmith@greatermankato.com         | Greater Mankato Growth                           | 1961 Premier Dr Ste 100<br><br>Mankato,<br>MN<br>56001            | Electronic Service | No                | OFF_SL_23-215_Official |
| Ken        | Smith     | ken.smith@districtenergy.com      | District Energy St. Paul Inc.                    | 76 W Kellogg Blvd<br><br>St. Paul,<br>MN<br>55102                 | Electronic Service | No                | OFF_SL_23-215_Official |
| Beth       | Soholt    | bsoholt@cleangridalliance.org     | Clean Grid Alliance                              | 570 Asbury Street Suite 201<br><br>St. Paul,<br>MN<br>55104       | Electronic Service | No                | OFF_SL_23-215_Official |
| Anna       | Sommer    | ASommer@energyfuturesgroup.com    | Energy Futures Group                             | PO Box 692<br><br>Canton,<br>NY<br>13617                          | Electronic Service | No                | OFF_SL_23-215_Official |
| Peggy      | Sorum     | peggy.sorum@centerpointenergy.com | CenterPoint Energy                               | 505 Nicollet Mall<br><br>Minneapolis,<br>MN<br>55402              | Electronic Service | No                | OFF_SL_23-215_Official |
| Mark       | Spurr     | mospurr@fvbenergy.com             | International District Energy Association        | 222 South Ninth St., Suite 825<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No                | OFF_SL_23-215_Official |
| Byron E.   | Starns    | byron.starns@stinson.com          | STINSON LLP                                      | 50 S 6th St Ste 2600<br><br>Minneapolis,<br>MN<br>55402           | Electronic Service | No                | OFF_SL_23-215_Official |
| Richard    | Stasik    | richard.stasik@wecenergygroup.com | Minnesota Energy Resources Corporation (HOLDING) | 231 West Michigan St - P321<br><br>Milwaukee,<br>WI<br>53203      | Electronic Service | No                | OFF_SL_23-215_Official |

| First Name | Last Name | Email                              | Company Name                           | Address   | Delivery Method    | View Trade Secret | Service List Name      |
|------------|-----------|------------------------------------|--|---|--------------------|-------------------|------------------------|
| Kristin    | Stastny   | kstastny@taftlaw.com               | Taft Stettinius & Hollister LLP        | 2200 IDS Center<br>80 South 8th St<br>Minneapolis,<br>MN<br>55402         | Electronic Service | No                | OFF_SL_23-215_Official |
| James M    | Strommen  | jstrommen@kennedy-graven.com       | Kennedy & Graven,<br>Chartered         | 150 S 5th St Ste 700<br><br>Minneapolis,<br>MN<br>55402                   | Electronic Service | No                | OFF_SL_23-215_Official |
| Kent       | Sulem     | ksulem@mmua.org                    | MMUA                                   | 3131 Fernbrook Ln N Ste<br>200<br><br>Plymouth,<br>MN<br>55447-5337       | Electronic Service | No                | OFF_SL_23-215_Official |
| Emily      | Suppes    | emily.suppes@centerpointenergy.com | CenterPoint Energy<br>Minnesota Gas    | 505 Nicollet Mall<br><br>Minneapolis,<br>MN<br>55402                      | Electronic Service | Yes               | OFF_SL_23-215_Official |
| Eric       | Swanson   | eswanson@winthrop.com              | Winthrop & Weinstine                   | 225 S 6th St Ste 3500<br>Capella Tower<br>Minneapolis,<br>MN<br>554024629 | Electronic Service | No                | OFF_SL_23-215_Official |
| Matthew    | Tomich    | tomich@energy-vision.org           | Energy Vision                          | 138 E 13th St<br><br>New York,<br>NY<br>10003                             | Electronic Service | No                | OFF_SL_23-215_Official |
| Jessica    | Tritsch   | jessica.tritsch@sierraclub.org     | Sierra Club                            | 2327 E Franklin Ave<br><br>Minneapolis,<br>MN<br>55406                    | Electronic Service | No                | OFF_SL_23-215_Official |
| Julie      | Voeck     | julie.voeck@nee.com                | NextEra Energy<br>Resources, LLC       | 700 Universe Blvd<br><br>Juno Beach,<br>FL<br>33408                       | Electronic Service | No                | OFF_SL_23-215_Official |
| Sam        | Wade      | sam@rngcoalition.com               | Coalition for Renewable<br>Natural Gas | 1017 L Street #513<br><br>Sacramento,<br>CA<br>95814                      | Electronic Service | No                | OFF_SL_23-215_Official |
| Nicole     | Westling  | nicole.westling@state.mn.us        | Department of Commerce                 | 85 7th Place E<br>Suite 280<br>St Paul,<br>MN<br>55001                    | Electronic Service | No                | OFF_SL_23-215_Official |

| First Name | Last Name | Email                              | Company Name           | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|------------|-----------|------------------------------------|------------------------|--|--------------------|-------------------|------------------------|
| Casey      | Whelan    | cwhelan@kinectenergy.com           | Kinect Energy Group    | 605 Highway 169 N Ste 1200<br><br>Plymouth, MN 55441                     | Electronic Service | No                | OFF_SL_23-215_Official |
| Laurie     | Williams  | laurie.williams@sierraclub.org     | Sierra Club            | Environmental Law Program<br>1536 Wynkoop St Ste 200<br>Denver, CO 80202 | Electronic Service | No                | OFF_SL_23-215_Official |
| Joseph     | Windler   | jwindler@winthrop.com              | Winthrop & Weinstine   | 225 South Sixth Street, Suite 3500<br><br>Minneapolis, MN 55402          | Electronic Service | No                | OFF_SL_23-215_Official |
| Tim        | Wulling   | t.wulling@earthlink.net            |                        | 1495 Raymond Ave.<br><br>Saint Paul, MN 55108                            | Electronic Service | No                | OFF_SL_23-215_Official |
| Donald     | Wynia     | donald.wynia@centerpointenergy.com | CenterPoint Energy     | CenterPoint Energy<br>505 Nicollet Mall<br>Minneapolis, MN 55402         | Electronic Service | No                | OFF_SL_23-215_Official |
| Grant      | Zimmerman | GZIMMERMAN@AMPAMERICAS.COM         | Amp Americas           | 811 W Evergreen Ave Ste 201<br><br>Chicago, IL 60642                     | Electronic Service | No                | OFF_SL_23-215_Official |
| Kurt       | Zimmerman | kwz@ibew160.org                    | Local Union #160, IBEW | 2909 Anthony Ln<br><br>St Anthony Village, MN 55418-3238                 | Electronic Service | No                | OFF_SL_23-215_Official |
| Patrick    | Zomer     | Pat.Zomer@lawmoss.com              | Moss & Barnett PA      | 150 S 5th St #1200<br><br>Minneapolis, MN 55402                          | Electronic Service | No                | OFF_SL_23-215_Official |