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July 8, 2025

VIA eFILING

Mr. Mike Bull
Deputy Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2116

**Re: In the Matter of a Commission Evaluation of Changes to Natural Gas Utility
Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals**

Docket No. G999/CI-21-565

INITIAL COMMENTS

Dear Mr. Bull:

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits the following comments in response to the Minnesota Public Utilities Commission's ("Commission") Notice of Comment Period ("Notice") issued May 5, 2025. In its Notice, the Commission requests comment on what actions, if any, should the Commission take to modify existing gas line extension policies for rate regulated gas utilities, and included the following topics open for comment.

If you have questions, please contact us at Emily.Suppes@centerpointenergy.com or 612-321-5363 and Seth.DeMerritt@centerpointenergy.com or 612-321-4423

Sincerely,

/s/ Emily Suppes

Director, Regulatory

/s/ Seth DeMerritt

Manager, Regulatory & Rates

Attachments

C: Service List

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

Katie Sieben	Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of a Commission Evaluation
of Changes to Natural Gas Utility
Regulatory and Policy Structures to Meet
State Greenhouse Gas Reduction Goals

Docket No. G999/CI-21-565

**CENTERPOINT ENERGY'S
COMMENTS IN RESPONSE TO THE
MINNESOTA PUBLIC UTILITIES
COMMISSION'S MAY 5, 2025, NOTICE**

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits the following comments in response to the Minnesota Public Utilities Commission's ("Commission") Notice of Comment Period ("Notice") issued May 5, 2025. In its Notice, the Commission requests comment on what actions, if any, should the Commission take to modify existing gas line extension policies for rate regulated gas utilities, and included the following topics open for comment.

- Should the Commission consider any modifications to how gas utilities calculate free footage allowance and other costs related to gas main and service line extensions? If so, what factors or conditions would justify changes? And how would any proposed changes affect new connecting customers and other ratepayers?
- If the Commission should make modifications to regulated gas utilities' gas line extension policies, how would rules, statutes, and Commission orders justify those modifications?
- Which proposed modifications, if any, would necessitate gas utilities to coordinate and/or consult with electric utilities in the service territory where a gas line extension is being contemplated?
- How should the Commission consider the results of Minnesota Energy Resource Corporation's Line Extension Policy Study in this matter?
- What lessons should the Commission consider from proceedings in other states related to this matter?

- Should any distinctions be made between different customer classes when considering modifications?
- How should the Commission consider the needs of low-income customers and other areas of equity in this matter?
- Are there other issues or concerns related to this matter?

As addressed in the Notice, interest in broader conversations about potential modifications to gas utility line extension policies have occurred in recent rate cases, In CenterPoint's 2021 rate case, Docket G008/GR-21-435, for settlement purposes, the Company agreed to reduce the free main footage allowance from 150 feet to 100 feet, and to address broader line extension policies in the Future of Gas docket, Docket No. G999/CI-21-565. In Minnesota Energy Resources Corporation ("MERC") rate case in Docket G011/GR-22-504, MERC agreed to work with stakeholders to examine their line extension policies and subsequently filed a study.

CenterPoint Energy continues to support fuel-neutral energy policy that makes Minnesota a national leader in safe, reliable, efficient, and affordable energy for all customers. Additionally, CenterPoint Energy supports the Minnesota Regulatory Compact which, among other things, requires utilities provide affordable rates to all customers. Socializing line extension costs amongst all customers provides an affordable way for new customers to exercise their choice to enter the system which benefits all customers. There is no clear direction from the Minnesota Legislature to remove or alter current natural gas line extension incentives that lower customer costs to connect to their choice of energy services.

The Company continues to support the customer efficiencies and cost savings of utilizing dual-fuel systems with natural gas and see the line extension policies enabling the access for customers to use available energy systems to meet their efficiency goals.

CenterPoint Energy provides energy services to meet each individual customer's energy choices and needs. Over the last forty years, line extensions have and continue to be an important and historically consistent tool for Minnesotans to access affordable and reliable energy, as well as to enable customer decarbonization pathways through utility access to energy efficiency and innovation programs. The Company's historic and current line extension policies have aided the energy infrastructure build out for the metropolitan and suburban areas of Hennepin County and are continuing to aid the fastest growing Minnesotan counties in CenterPoint Energy's service area of Wright, Carver, Anoka, Washington, Scott, Isanti, Dakota, Ramsey, Douglas, and Rice Counties based on recent Company project work. The Company looks forward to discussing how line extensions not only provide benefits and lower costs for prospective customers, but to the existing 920,000 CenterPoint Energy customers in over 260 local Minnesota communities.

CenterPoint Energy does not recommend the Commission consider any modifications to how gas utilities calculate free footage allowance and other costs related to gas main and service line extensions.

Current CenterPoint Energy Line Extension Policies benefit all customers

CenterPoint Energy does not charge residential customers for service line extensions for the first 75 feet measured from the property line or 105 feet from the center of the publicly dedicated street, alley, or utility easement, whichever is greater.¹ If additional footage for a service line is needed, a Contribution in Aid of Constriction (“CIAC”) is calculated at \$4.00 per foot that is charged to the customer. Meanwhile, for residential customers, the Company does not charge for main extensions for the first 100 feet, and a CIAC of \$3.00 per foot is charged to customers for any main footage greater than 100 feet.² Comparatively, for commercial and industrial customers, CenterPoint Energy applies an economic feasibility calculation to determine if a CIAC is necessary based upon projected future revenues of the main and service extension. By employing an economic feasibility calculation, the Company is addressing the differences for both the costs and the revenues that are recognized to support a commercial and industrial customer, while ensuring that current customers of all classes are benefited by the addition of the new customer. Regardless of what customer class they are.

All CenterPoint Energy Minnesota customers across the state have been able to consistently rely on gas utility line extension policies over the last forty years to drive economy growth and enable equitable access to essential energy services.³

Benefits to New Customers by connecting to CenterPoint Energy services

Minnesota residents continue to choose natural gas for their energy needs, depending on gas utilities to keep them safe and warm, especially during sub-zero winter temperatures. Minnesota has seen continued growth in the total number of residential customers using natural gas increasing a total of 74% in the residential sector from 1990 to 2023.⁴ Comparatively, the number of total new households in Minnesota has increased 41% during that same time period.⁵ These data points show that while Minnesota has seen a significant increase in the number of new households that are choosing to use natural gas, an additionally large number of existing Minnesota households have chosen natural gas from alternative fuels to account for the difference in the percentages. A significant driver of customer’s converting their energy systems to dual-fuel systems including natural gas can be attributable to utility line extension policies. As can be seen in Table 2 below, natural gas offers an affordable resource to heat Minnesota households, as heat is a critical resource in Minnesota’s climate.

¹ CenterPoint Energy Gas Rate Book, Section VI, Page 12, 5.10

² CenterPoint Energy Gas Rate Book, Section VI, Page 6, 4.06

³ Docket No. G-008/M-84-233

⁴ From 946,107 in 1990 to 1,644,691 in 2023. This growth represents greater than 20,000 customer additions annually. U.S. Energy Information Administration, Minnesota Natural Gas Number of Residential Customers (June 30, 2025). https://www.eia.gov/dnav/ng/hist/na1501_smn_8a.htm

⁵ From 1,647,974 in 1990 to 2,327,299 in 2023. Minnesota State Demographic Center, MN & EDR Data, Historical Estimates of Minnesota, its Economic Development Regions, and its Counties' Population and Households, 1990-2023 (September 2024). <https://mn.gov/admin/demography/data-by-topic/population-data/our-estimates/>

Table 2: Estimated Total Annual Bill for Equivalent Usage of Energy Options

	Natural Gas	Propane	Fuel Oil	Electricity
Units ⁶	887 ⁷	969	591	25,996
Fixed Costs ⁸	\$ 10.83	\$ -	\$ -	\$ -
Volumetric Charge	\$ 1.10 ⁹	\$ 1.90 ¹⁰	\$ 3.388 ¹¹	\$ 0.166 ¹²
Total Annual Bill	\$ 1,110	\$ 1,840	\$ 2,004	\$ 4,315

For the same total annual amount of energy across the four options, this cost comparison shows the benefit overall that natural gas provides to our affordability-focused customers as being a significant cost-effective alternative to heating homes in Minnesota. This simple calculation does not consider additional variables like equipment type and efficiencies or the complexities of energy use for dual fuel systems. It simply is showing for the annual energy required of an average residential natural gas customer, these are the costs required to serve that particular energy load with the various options available. As helpful context, the average US household consumes approximately 10,500 kwh of electricity per year¹³. By comparison, in order to generate the same annual energy that 887 therms of natural gas produces, a customer would need to consume almost 26,000 kwh per year. It is important to note, cost analysis is the primary focus and driver of low-income and fixed-income customers when they are evaluating energy needs.

Connecting to the natural gas system also provides residents access to other CenterPoint Energy managed utility initiatives, including the Company’s Energy Conservation and Optimization (“ECO”) program, Gas Affordability Program (“GAP”), and Natural Gas Innovation Act (“NGIA”) program. These customer programs add additional benefits of providing resources to increase energy efficiency, assist low-

⁶ Units are therms for Natural Gas (1 therm=100,000 BTU), converted using U.S. Energy Information Administration conversion factors to equivalent gallons for Propane and Fuel Oil, and converted to equivalent Kwh for Electricity. (October 28, 2024)

<https://www.eia.gov/energyexplained/units-and-calculators/>

⁷ Residential sales forecast from Company’s 2023 Rate Case, Docket No. G-008/GR-23-173

⁸ Based on December 2024 Pricing

⁹ Based on December 2024 Pricing

¹⁰ U.S. Energy Information Administration. Weekly Heating Oil & Propane Prices. (May 21, 2025)

https://www.eia.gov/dnav/pet/pet_pri_wfr_dcus_smn_w.htm

¹¹ U.S. Energy Information Administration. Weekly Heating Oil & Propane Prices. (May 21, 2025)

https://www.eia.gov/dnav/pet/pet_pri_wfr_dcus_smn_w.htm

¹² U.S. Bureau of Labor Statistics, Midwest Information Office. Average Energy Prices, Minneapolis-St. Paul-Bloomington – December 2024. (January 22, 2025)

https://www.bls.gov/regions/midwest/news-release/averageenergyprices_minneapolis.htm

¹³ U.S. Energy Information Administration. Electricity consumption in U.S. homes. (December 18, 2023)

<https://www.eia.gov/energyexplained/use-of-energy/electricity-use-in-homes.php>

income residents, and offering innovative product solutions for future energy needs. The Company is committed to find innovative ways to reduce carbon emissions, and it is important to note, that Minnesota’s state policy goals regarding carbon emissions does not equate to no more natural gas use.¹⁴¹⁵ Instead, CenterPoint Energy sees itself as a partner through ECO, NGIA, and other programs to help the state meet these goals. Several of the resources, such as renewable natural gas (“RNG”) and hydrogen blending, rely on the natural gas system to distribute these resources to end-use customers. Therefore, line extension policy restrictions could hinder the ability of customers to receive access to these energy resources.

While, also giving customers access to additional Company initiatives, customers can achieve all of this knowing the natural gas system is operated and supported by a Company with over 150 years of natural gas delivery experience when comparing energy services to delivered fuels options. This dedication to the industry and its’ customers has supported and reliably delivered a new Company daily throughput in Minnesota of 1.57 billion cubic feet of natural gas on January 21, 2025, after Minnesotans experienced 64 straight hours of below-zero temperatures. The inclusion of customers into the natural gas industry also brings them under the regulations and compliance of the Pipeline and Hazardous Materials Safety Administration (“PHMSA”). Under PHMSA, the natural gas industry is overseen by an agency that establishes national policy, sets and enforces standards, educates, and conducts research to prevent incidents. The regulations and oversight of PHMSA help ensure that CenterPoint Energy, as well as other natural gas distribution companies, are providing natural gas safely to its customers. A robust and extensive gas network can enhance resilience and preparedness for emergencies, ensuring that gas supply can be rerouted or restored quickly if needed.

These current extension policies have allowed CenterPoint Energy to provide the benefits of natural gas service not only to homes, but also to businesses and public service buildings that support local communities. For example, in the last year, these policies have enabled customer economic growth opportunities across our footprint to extend CenterPoint Energy service to communities building schools, churches, a city hall, agricultural grain dryer, a workout facility, and a fire station, as well as two low-income housing projects. These recent examples showcase the reality of the impact of these incentives for our communities and meeting energy needs affordability.

Existing Customers also benefit by adding new customers to natural gas system

In addition to the benefits previously addressed from the new or expanding customers directly using line extension policies, there is substantial evidence that current customers also benefit from these policies.

¹⁴ State of Minnesota. (2022). Minnesota’s Climate Action Framework.

<https://climate.state.mn.us/minnesotas-climate-action-framework>

¹⁵ Minnesota Statute §61.216H.02.01. Utilities: Greenhouse Gas Emissions: Greenhouse Gas Emissions Control: Greenhouse gas emissions-reduction goal. Amended 2023.

As discussed by Company witness Mr. Drew Sudbury in the Company's most recent rate case in Docket G008/GR-23-173,

when tariffs are correctly applied, it is reasonable for the costs of extensions to be shared between new and existing customers. This represents a compromise between placing the entire cost of an extension on a new customer versus rolling the entire cost into expense borne by ratepayers. Commission staff recognized this principle in briefing papers on the subject (Dockets No. G008/M-91-575, G007/M-91-460, G011/M-91-296, dated February 10, 1992, page 3), noting, "Most of the LDCs' tariffs specify a footage allowance and a \$ per foot charge for extensions that go beyond the footage allowance. The footage allowance amount is determined by what the LDC can recover from the new customer through earnings in a relatively short period of time. The amount of time is usually 3 to 5 years rather than the expected life of the pipe." The Company's extension tariff is structured to provide recovery of extension costs, via revenue from new customers, within a five-year period.

This statement is supported by Attachment A which provides an updated calculation showing that based on 2024 actuals, the addition of customers adds value to existing customers on the Company's system. Under the current line extension policy, adding new customers to CenterPoint's natural gas system creates a benefit to existing customers beginning in the fifth year after installation of the assets. In total, adding a new customer under the current line extension policy results in a net positive amount of \$4,522 over the life of the assets which directly help offset the fixed costs of the current customers. Additionally, if the Company were to target collection of costs from the new customers by the 6th year after installation, then the main free footage amount could be increased to 113 feet.

Free footage in line extension policies is further supported in the MERC study as filed in Docket G011/GR-22-504 where MERC performed scenario analysis, adjusting the amount of free footage. In MERC's study, it was determined that a breakeven of service line free footage was 122 feet, and that customers who installed less than 115 feet benefitted;

MERC's system and existing customers by covering the cost of the service line extension and spreading additional costs and volumes over a larger customer base.

While there are some parties that argue that line extension policies rely on current customers to support the addition of new customers, the before mentioned analysis in Attachment A, as well as the referenced MERC study, shows that adding new customers benefits the system as a whole.

Lastly, line extensions are not the only area within the utility industry that costs are socialized for the benefit of the system.

Costs associated with CenterPoint Energy's customer programs like our energy efficiency and affordability programs, among other areas of utility costs, are spread across the Company's customer base with various customers being the direct beneficiaries of those socialization efforts.

Minnesota does not have legislative policy direction removing line extensions incentives

In addition to the long practice in Minnesota regarding free footage and line extension policies and the benefits those policies have provided our customers, there is also no clear direction from the Minnesota legislature to remove or alter current line extension policies. Minnesota energy policies have consistently been fuel-neutral to support customer energy needs. Natural gas will continue to play an important role in the energy transition, as customers will continue to rely on the natural gas system for heat on the coldest winter days.

Minnesota energy policy requires consumer choice and prioritizes energy efficiency

The ECO Act of 2023¹⁶ is a prime example of Minnesota energy policy intent on reducing energy system customer burdens through nation-leading utility measures aimed to help consumers manage their energy use for both electric and gas utilities. The legislature found that cost-effective energy savings are preferred over all other energy resources, and when looking at the heating energy costs and efficiencies in winter heating from above, natural gas is a cost-effective energy option that consumers can choose from to meet their energy needs. ECO further highlights the importance of consumer's free choice¹⁷, encouraging the intent of the legislature to not limit the energy resources available to Minnesotans, instead promote reducing utility costs for businesses and residents.

As stated in a March 3, 2021, article by the University of Minnesota Extension¹⁸, The Company also recognizes that each area of the state requires access to equitable energy resources, specifically supporting customer energy choice to meet their unique needs. Greater Minnesota has an average energy burden of 5 percent or higher, as compared to the national average of 3.5 percent or Minnesota's statewide average of 2 percent. Allowing line extensions to continue as is, or even looking for ways to increase access through pipeline expansions, will assist in reducing the energy burden for Minnesotan's experience.

CenterPoint Energy continues to support the customer efficiencies and cost savings of utilizing dual-fuel systems with natural gas and see the line extension policies enabling

¹⁶ Minn. Statute 216B.2401

¹⁷ Minn. Statute 216B.241 Subd. 2c

¹⁸ University of Minnesota Extension. "Reducing energy burden in Greater Minnesota" (March 3, 2021).
<https://extension.umn.edu/rsdp-happenings/reducing-energy-burden-greater-minnesota>

the access for customers to use available energy systems to meet their efficiency goals.

Minnesota policy encourages housing affordability

There are movements within the state to bring down building costs and home ownership for residents that want affordable housing in Minnesota. By doing away with or negatively impacting line extension policies the cost to connect a home will most likely be borne by the homeowner of the new home as either a lump sum up front cost or financed over the life of the mortgage. Alternatively, the cost to heat the home could be greater as fuel sources with higher operating costs are used instead of natural gas.

Minnesota has numerous building codes that can be linked to space conditioning and should be taken into context when discussing line extension policies, and natural gas as a whole. As previously discussed, Minnesota can experience significantly cold days, and natural gas plays an important role in ensuring customers are safe and warm. Minnesota building codes are neutral to heating fuel sources and allow for the use of natural gas, and explicitly have codes associated with the installation of piping for natural gas appliances.

Finally, utilizing affordable natural gas equipment for energy needs supports Minnesota state statute 326B.101, requiring construction of buildings should be permitted at the least possible cost consistent with recognized standards of health and safety.

By disincentivizing the expansion of natural gas, it restricts the accessibility of an affordable energy resource for Minnesotans that is written into statute and building codes and adds increased costs to customers in the form of higher fuel costs going forward.

State decarbonization goals require all energy solutions

CenterPoint Energy supports Minnesota's goal to reduce economy-wide GHG emissions to net zero by 2050 and recognizes that it has an important part to play in helping the state achieve that goal.

However, the path to decarbonizing industry and buildings that currently rely on geologic gas remains uncertain in Minnesota and throughout the country. Minnesota has no silver bullet, no single technology that can be relied upon to decarbonize all natural gas end uses. Instead, there is a mixture of possible solutions, largely reflected in the eight innovative resource options listed in the NGIA. As was reflected in the G21 Report, the path to decarbonizing buildings and industry in Minnesota will require some mixture of these innovative resources.¹⁹ But selecting the optimal balance between

¹⁹ Decarbonizing Minnesota's Natural Gas End Uses: Stakeholder Process Summary and Consensus Recommendations, July 2021, <https://e21initiative.org/wp-content/uploads/2021/07/Decarbonizing-NG-End-Uses-Stakeholder-Process-Summary.pdf>.

these resources is not realistic at this time given the limited experience Minnesota and the rest of the country have with deploying these different technologies.

The historic passage of the NGIA made Minnesota a national leader in natural gas decarbonization policy, and importantly, this bi-partisan law does not assume a technological winner. Instead, the NGIA is designed to allow gas utilities and Minnesota to implement a variety of pilots to gain experience and gather additional data on the various innovative resource options and ramp up our natural gas decarbonization efforts based on the data as our knowledge deepens and our path to decarbonization advances.

For additional context, the Company is investing significantly in alternative resources such as large-scale thermal energy networks, renewable natural gas (“RNG”), and hydrogen as supported by the NGIA legislation, however, these pilot alternatives are not advanced at full scale to meet the current demands of Minnesota’s energy needs. For reference, the Company is anticipating spending over \$110M during its 5-year NGIA plan which is estimated to reduce 1.1 million metric tons CO₂e over the lifetime of the proposed projects, equal to about 13% of total emissions from natural gas supplied to our Minnesota customers in 2020 or the energy use of 150,000 homes.

While many of the NGIA pilots support substantial geologic natural gas savings by reducing overall throughput, most of the greenhouse gas reduction technologies benefit from the resiliency of the gas infrastructure to deliver these savings. By maintaining connectivity to the gas system, innovative technologies can be integrated by customers who would otherwise hesitate to give up the reliability and economic benefits of gas infrastructure. As more innovative resources are deployed to meet sustainability objectives, savings will continue to increase even as a more diversified system grows to meet customer needs, providing the full comfort and safety of an energy system that is essential in a cold weather state, even while only initially reducing the overall amount of geologic natural gas by a fraction of what CenterPoint Energy distributes annually.

The gas system is engineered to provide energy for the daily peak load, which is different than the noted amounts of gas savings referencing overall throughput through the system over the course of a year. The same gas system is required to serve the customer using less gas throughout the year, because the system still needs to serve their peak load on the coldest day. Line extension policies still benefit customers that are reducing overall gas use, because the line extension policies create a larger customer base which in turn allows the Company to spread the system costs across more customers. This reduces costs per customer while allowing the Company to provide the system customers need on their peak load days.

Support policy learnings from Midwest regional experience

While some states have enacted stricter line extension policy actions through legislative actions the results of those policy changes have yet to be studied. Additionally, those states don’t necessarily have the cold winters Minnesota has.

Meanwhile, neighboring states such as Iowa and Illinois have legislative direction regarding line extension policies. In the case of Iowa, utilities are directed to not require a customer to pay a CIAC for distribution mains if the estimated cost are less than or equal to three times the estimated base revenue or does give the utility the option to use a feasibility model, rather than three times estimated base revenue, to determine what, if any, advance for construction is required of the customer. Meanwhile, Iowa also does not require a CIAC for service lines where the length of the service line to the riser is up to 50 feet on private property or 100 feet on private property if polyethylene plastic pipe is used.²⁰ Similarly, Illinois also has legislative guidance that limits the CIAC payment for new development and growth customers to incremental costs. Also, while not explicitly stated in legislative rules, utilities in other Midwest regional states such as Michigan and Wisconsin utilize a CIAC to collect incremental costs only, as opposed to the entire cost of the project.

It is important to note that these states while regionally located near Minnesota, also have similar temperature profiles, experiencing average coldest temperatures of 12.4 degrees for Minnesota, 21.7 for Michigan and Iowa, 28.3 for Illinois and 17.2 for Wisconsin. Line extension policies of neighboring states play a more direct role in how businesses and residents think about building, investing, and choosing where to call home. States within the Midwest region that Minnesota is competing with for businesses and homeowner growth continue to rely on providing new home builders with aid for their gas line extensions.

If more restrictive line extension policies are enacted in Minnesota, the costs to connect to the natural gas system will be passed along to the new home or business owner. For example, while Minnesota's currently incur costs at \$168 per square foot to build a new home, the additional costs incurred by a new home builder will only increase housing costs that are already above the national average of \$158 per square foot.²¹ Meanwhile the neighboring states that utilize line extension policies, which encourage socialization of the natural gas system already, realize building costs less than Minnesota on a per square foot basis of \$160, \$155, and \$155 for Wisconsin, Iowa, and Michigan, respectively.

Conclusion

The current line extension policies help provide Minnesota residents with a reliable source of energy for their home heating needs. Additionally, residents also receive the benefit of safe delivery of natural gas under the regulation of PHMSA and access to the Company's energy efficiency, low-income, and innovation programs. Line extension policies do not negatively impact customers who want to electrify or use alternative resources, instead these policies provide customers with a choice to make appropriate energy decisions for their situation and allow an avenue for businesses to be competitive with businesses in neighboring states.

²⁰ IAC, Utilities 199, Chapter 19.

²¹ Today's Homeowner. "How Much Does It Cost to Build a Home in Each State?" (April 11, 2025) <https://todayshomeowner.com/home-finances/guides/cost-of-building-a-home-by-state/>

With this as the background, CenterPoint Energy requests the Commission not make any modifications to how gas utilities calculate free footage allowance and other costs related to gas main and service line extensions. Additionally, CenterPoint Energy believes the current state of line extension policy supports low-income residents of Minnesota by providing access to affordable energy to heat their home.

CenterPoint Energy is committed to ensuring access to safe, clean and resilient energy, while striving to also reduce carbon emissions. This customer-focused approach seeks to provide exceptional service by balancing rate affordability and demonstrating environmental stewardship. The natural gas line extension footage allowance supports rate affordability, provides access to utility services, and broadens the pool of customers from which costs are recovered, spreading the fixed costs over a larger base.

CenterPoint Energy appreciates the opportunity to provide these comments and looks forward to continuing the discussion regarding line extension policies

CERTIFICATE OF SERVICE

I, Christina Benning, certify that on Tuesday, July 8, 2025, I served the attached Initial Comments Filing of CenterPoint Energy in Docket No. G999/CI-21-565 to all persons at the addresses indicated on the attached service list by having the document delivered via electronic filing.

/s/ Christina Benning

Senior Regulatory Paralegal
CenterPoint Energy

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24	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	21-565Official Service List
25	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	21-565Official Service List
26	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	21-565Official Service List
27	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
28	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
29	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
30	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
31	Tom	Dicklich	tdicklich@mntrades.org	Minnesota Building & Construction Trades Council		353 W. 7th St Rm 105 Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
32	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
33	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
34	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	21-565Official Service List
35	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	21-565Official Service List
36	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	21-565Official Service List
37	Mark	Foster	mark@housingfirstmn.org	Housing First Minnesota		2960 Centre Pointe Drive Roseville MN, 55113 United States	Electronic Service		No	21-565Official Service List
38	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	21-565Official Service List
39	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	21-565Official Service List
40	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
41	Debbie	Goettel	debbie.goettel@hennepin.us	Partnership on Waste and Energy		2785 White Bear Ave N Ste 350 Maplewood MN, 55109 United States	Electronic Service		No	21-565Official Service List
42	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
43	Laura	Haight	lhaight@pfpi.net	Partnership for Policy Integrity		POB 2513 Amherst MA, 01004 United States	Electronic Service		No	21-565Official Service List
44	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
45	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	21-565Official Service List
46	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	21-565Official Service List
47	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
48	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	21-565Official Service List
49	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
50	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-565Official Service List
51	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
52	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21-565Official Service List
53	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
54	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
55	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	21-565Official Service List
56	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	21-565Official Service List
57	D	Kalmon	dkalmon@mwmo.org	Mississippi Watershed		2522 Marshall St NE	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Management Organization		Minneapolis MN, 55418-3329 United States				Service List
58	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	21-565Official Service List
59	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
60	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	21-565Official Service List
61	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	21-565Official Service List
62	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
63	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
64	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
65	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	21-565Official Service List
66	Robert	Lems	administration@dmr-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	21-565Official Service List
67	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	21-565Official Service List
68	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
69	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-565Official Service List
70	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
71	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21-565Official Service List
72	Emily	Marshall	emarshall@ourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
73	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	21-565Official Service List
74	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
75	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	21-565Official Service List
76	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	21-565Official Service List
77	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-565Official Service List
78	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	21-565Official Service List
79	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
80	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-565Official Service List
81	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
82	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
83	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
84	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
85	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
86	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-565Official Service List
87	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
88	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	21-565Official Service List
89	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
90	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
91	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	21-565Official Service List
92	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	21-565Official Service List
93	Bret	Pence	bretpence@mnipl.org	Minnesota Interfaith Power and Light		106 Waverly Place Duluth MN, 55803 United States	Electronic Service		No	21-565Official Service List
94	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List
95	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	21-565Official Service List
96	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	21-565Official Service List
97	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
98	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	21-565Official Service List
99	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	21-565Official Service List
100	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	21-565Official Service List
101	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	21-565Official Service List
102	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
103	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-565Official Service List
104	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	21-565Official Service List
105	Patrick	Serfass	pserfass@ttcorp.com	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
106	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
107	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	21-565Official Service List
108	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	21-565Official Service List
109	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	21-565Official Service List
110	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
111	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
112	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	21-565Official Service List
113	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	21-565Official Service List
114	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
115	Mark	Spurr	mospurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
116	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
117	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List
118	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
119	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
120	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-565Official Service List
121	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	21-565Official Service List
122	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	21-565Official Service List
123	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L Street #513 Sacramento CA, 95814 United States	Electronic Service		No	21-565Official Service List
124	Nicole	Westling	nicole.westling@state.mn.us		Department of Commerce	85 7th Place E Suite 280 St Paul MN, 55001 United States	Electronic Service		No	21-565Official Service List
125	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Plymouth MN, 55441 United States				Service List
126	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	21-565Official Service List
127	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
128	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	21-565Official Service List
129	Grant	Zimmerman	gzimmerman@ampamericas.com	Amp Americas		811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States	Electronic Service		No	21-565Official Service List
130	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	21-565Official Service List
131	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List