

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Hwikwon Ham
Valerie Means
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of CenterPoint Energy Minnesota Gas' Natural Gas Conservation Improvement Program 2023 Status Report & Associated Compliance Filings

SERVICE DATE: November 8, 2024

DOCKET NO. G-008/M-24-43;

In the Matter of the 2023 Conservation Improvement Program Consolidated Filing by Great Plains Natural Gas Co.

DOCKET NO. G-004/M-24-44;

In the Matter of Greater Minnesota Gas, Inc.'s Petition for Approval of 2023 Energy Conservation and Optimization Program Tracker Account and Proposed Conservation Cost Recovery Adjustment

DOCKET NO. G-022/M-24-45;

In the Matter of Petition of Minnesota Energy Resources Corp. for Approval of the 2023 Conservation Improvement Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor

DOCKET NO. G-011/M-24-46;

In the Matter of Xcel Energy's 2024/2025 Natural Gas Conservation Improvement Program Adjustment Factor

DOCKET NO. G-002/M-24-47

The above-entitled matter was considered by the Commission on October 31, 2024, and the following disposition made:

CenterPoint Energy

- 1. Approved a 2023 Demand-Side Management (DSM) financial incentive of \$8,450,662 to be included in CenterPoint Energy's tracker account no sooner than the issue date of the Commission's Order in the instant docket.**

2. **Approved CenterPoint Energy's 2023 Conservation Improvement Program (CIP) tracker account activities with a December 31, 2023, ending over-recovery balance of \$6,131,707.**
3. **Approved the revised gas Conservation Cost Recovery Adjustment (CCRA) of \$0.1704 per dekatherm (Dth) for all of CenterPoint Energy's Minnesota customer classes, effective the first billing cycle in the month following the Commission's Order in this matter.**
4. **Approved CenterPoint Energy's customer notification message that reads as follows:**

The PUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of \$0.01704 per therm. This charge will be used to fund energy conservation activities and has been added to your delivery charge. For more information, please call or visit our website.
5. **Required CenterPoint Energy to submit a compliance filing with tariff sheets including all necessary calculations within 10 days of the issue date of the Order.**

Great Plains Natural Gas Company

6. **Approved Great Plains Natural Gas Company's 2023 DSM financial incentive of \$278,241 and CIP tracker account, resulting in a 2023 CIP tracker year-end balance of (\$401,172).**
7. **Approved a CCRA rate of \$0.0202 per Dth to be effective the first billing cycle after the Commission's determination in this matter.**
8. **Required Great Plains Natural Gas Company to include the following bill message in the billing month immediately following the date of the Order in the current docket:**

Great Plains recovers the cost changes in its energy conservation programs from the base established in 2021 through a Conservation Cost Recovery Adjustment (CCRA) subject to MN Public Utilities Commission approval. A CCRA of [insert rate] per dk is effective [insert effective date]. Learn more about reducing your energy use by visiting our website at www.gpng.com or calling us at 1-877-267-4764.
9. **Required Great Plains Natural Gas Company to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.**

Greater Minnesota Gas

10. **Approved Greater Minnesota Gas' 2021, 2022, and 2023 Energy Conservation and Optimization (ECO) tracker account with a December 31, 2023 tracker balance of \$415,344.**

11. Approved a Conservation Cost Recovery Adjustment of \$0.4407/Dth to be effective on the first billing cycle of the month following the Commission's Order.

12. Approved Greater Minnesota Gas' proposed bill message that reads as follows:

Effective _____, 2024, your bill will include an adjusted Conservation Cost Recovery Adjustment (CCRA). The Minnesota Public Utilities Commission approved the CCRA on _____, 2024. The CCRA is necessary and allowed by law to fund the state mandated Energy Conservation and Optimization Program. The CCRA is \$0.04407 per therm, or \$0.4407 per dekatherm, of natural gas that you use. If you have questions, please contact us at 1-888-931-3411 or www.greatermngas.com. Thank you.

13. Required Greater Minnesota Gas to submit a compliance filing within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

Minnesota Energy Resources Corp.

14. Approved a 2023 DSM financial incentive of \$1,494,587 to be included in Minnesota Energy Resources Corp.'s (MERC) tracker account no sooner than the issue date of the Commission's Order in the instant docket.

15. Approved MERC's 2023 CIP tracker account activities with a December 31, 2023, ending over-recovery balance of (\$3,070,173.82).

16. Approved the revised gas CCRA of \$0.01221 per therm for all of MERC's Minnesota customer classes, effective January 1, 2025, or the first billing cycle in the month following the Commission's Order, in this matter, whichever is later.

17. Approved MERC's customer notification message that reads as follows:

Effective January 1, 2025, the CCRA (conservation cost recovery adjustment) has been revised to \$0.01221 per therm. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses.

18. Required MERC to submit a compliance filing with tariff sheets including all necessary calculations within 10 days of the issue date of this Order.

Xcel Energy

19. Approved Xcel Energy's natural gas Shared Savings DSM financial incentive of \$4,253,188.

20. Approved a 2024/2025 natural gas CIP Adjustment Factor of \$ 0.030554 per therm beginning the first billing cycle in the month following the Commission's Order in this matter.

- 21. Approved Xcel Energy's Natural Gas 2023 Tracker account as filed on April 1, 2024, with an ending balance of (\$5,587,506).**
- 22. Approved Xcel Energy's proposed bill message, effective the first month the 2024/2025 natural gas CIP Adjustment Factor takes effect, revised as necessary to incorporate the approved CIP Adjustment Factor and effective date, that reads as follows:**
- Effective December 1, 2024, the Resource Adjustment line item on your bill has increased due to a change in the Conservation Improvement Program (CIP) factor. The natural gas CIP portion of the Resource Adjustment is \$0.030554 per therm.**
- 23. Required Xcel Energy to submit a compliance filing with tariff sheets including all necessary calculations within 10 days of the issue date of the Order.**

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION



A handwritten signature in black ink, appearing to read "Will Seuffert", with a long, sweeping horizontal line extending to the right.

Will Seuffert
Executive Secretary

August 1, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G008/M-24-43

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

CenterPoint Energy's Aggregated Compliance Filing, including: 2023 Conservation Improvement Program Status Report, 2023 Demand Side Management Financial Incentive, 2023 Conservation Improvement Program Tracker Report, and 2023/2024 Conservation Cost Recovery Adjustment (*Petition*).

The *Petition* was filed on May 1, 2024, by:

Tyler Glewwe
Regulatory Analyst, Conservation Improvement Program
CenterPoint Energy
505 Nicollet Mall
PO Box 59038
Minneapolis, MN 55459-0038

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve CenterPoint Energy's *Petition***. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ DR. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

Attachment



Before the Minnesota Public Utilities Commission
Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. G008/M-24-43

I. SUMMARY OF THE UTILITY'S PROPOSAL

On May 1, 2024, CenterPoint Energy, a Division of CenterPoint Energy Resources Corporation (CenterPoint or the Company), submitted a filing in the present docket entitled *CenterPoint Energy's Aggregated Compliance Filing, Including: 2023 Conservation Improvement Program Status Report, 2023 Demand-Side Management Financial Incentive, 2023 Conservation Improvement Program Tracker Report and 2024/2025 Conservation Cost Recovery Adjustment (Petition)* to the Minnesota Public Utilities Commission (Commission).

CenterPoint's *Petition* includes the following:

- A financial incentive of \$8,450,662 for 2023 CIP activities;
- A 2023 CIP tracker with a year-end balance of \$6,131,707; and
- A proposed Conservation Cost Recovery Adjustment (CCRA) factor of \$0.01704 per therm, with an effective date of October 1, 2024.

II. COMMISSION'S 2023 ORDER

On September 5, 2023, the Commission issued its Order approving CenterPoint's 2022 CIP filings,¹ with the following determinations:

1. Approved CenterPoint Energy's 2022 DSM Financial Incentive of \$7,673,591.
2. Approved an increase in the 2023/2024 CCRA to \$0.0926 per dekatherm, effective October 1, 2023, or the first month following Commission approval.
3. Approved CenterPoint Energy's proposed bill message, and its proposed tariff sheet: "The PUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of \$0.00926 per therm. This charge will be used to fund energy conservation activities and has been added to your delivery charge. For more information, please call or visit our website."
4. Required CenterPoint Energy to submit a compliance filing with tariff sheets including all necessary calculations within 10 days of the issue date of this Order.

¹ See Commission's September 5, 2023, Order in Docket No. G008/M-23-182.

On September 15, 2023, CenterPoint submitted its compliance tariff sheets in response to Order Point 5.

III. DEPARTMENT ANALYSIS

The Department's analysis of CenterPoint's *Petition* is provided below in the following sections:

- In Section III.A, a review of Minnesota's updated conservation statutes;
- In Section III.B, CenterPoint's proposed 2023 shared savings DSM financial incentive;
- In Section III.C, CenterPoint's proposed reconciliation for its 2023 CIP tracker account;
- In Section III.D, CenterPoint's proposed change to its currently approved CCRA;
- In Section III.E, CenterPoint's historical CIP achievements and incentives, 20011-2023.

A. MINNESOTA'S UPDATED CONSERVATION STATUTES

In 2021, the Minnesota Legislature passed the Energy Conservation and Optimization (ECO) Act. This act updated Minnesota's existing "CIP" statutes, which have since become known as the "ECO" statutes. Subsequently, the state's Conservation Improvement Program (CIP) was re-branded as the state's Energy Conservation and Optimization (ECO) program. As a result, CenterPoint's triennial filing governing the 2021-2023 years was considered a "CIP" Triennial Filing (Docket No. G008/CIP-20-478) and CenterPoint's most recent triennial filing covering years 2024-2026 was considered its first "ECO" triennial filing (Docket No. G008/CIP-23-95). The Department expects future CenterPoint reports will also incorporate the "ECO" language change.

The ECO Statutes impacting Investor-Owned Utilities are as follows:

- Minnesota Statutes §216B.2401 (Energy Savings and Optimization Policy Goal);
- Minnesota Statutes §216B.2402 (Definitions);
- Minnesota Statutes §216B.241 (Public Utilities; Energy Conservation and Optimization);
- Minnesota Statutes §216B.2411 (Distributed Energy Resources); and
- Minnesota Statutes §216B.2412 (Decoupling of Energy Sales from Revenues).

The Department has reviewed the ECO Statutes for any changes that potentially impact the Commission. As under the former CIP Statutes, the ECO Statutes grant jurisdiction to the Department for most of the state's conservation activities. However, the Commission continues to have jurisdiction over two specific conservation items relevant to these Comments: the financial incentive and the recovery of ECO (formerly CIP) costs. The Department found no substantive changes to those sections concerning the Commission's authority that would impact this proceeding. However, the Department's

review of the Company's Shared Savings Financial Incentive will be impacted in next year's filing, as that future review will incorporate the Commission's January 25, 2024 *Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan* from Docket No. E,G999/CI-08-133 (In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation).

Therefore, the Department has determined that its current review of CenterPoint's *Petition* can proceed as it has in past years.

B. CENTERPOINT'S PROPOSED FINANCIAL INCENTIVE FOR 2023 CIP ACHIEVEMENTS

1. Background and Summary of CenterPoint's Proposed DSM Incentive

The Shared Savings Demand Side Management Financial Incentive Plan was initially approved by the Commission in Docket No. E,G999/CI-08-133 on January 27, 2010. On August 5, 2016, in the same docket, the Commission adopted an Order modifying the Demand Side Management Financial Incentive Plan for the years 2017-2019. In an Order issued November 15, 2021 in Docket No. 017/M-21-228, the Commission extended the modification through 2020. On December 9, 2020, the Commission approved the parameters for the Shared Savings financial incentive mechanism covering the 2021-2023 CIP triennial (December 9 Order). The Commission capped electric and gas incentives at 10 percent of net benefits and 30 percent of expenditures. The December 9 Order approved an expenditure cap of 35 percent if electric utilities meet or exceed energy savings of 2 percent and gas utilities of 1.2 percent of retail sales.

The instant filing covers CIP activities occurring in 2023, and so the 2023 financial incentive is subject to the following two caps: 10.0 percent of net benefits and up to 35 percent of expenditures.

2. The Department's Review of CenterPoint's Proposed 2023 DSM Incentive

In the *Petition*, CenterPoint provided the benefit and cost results associated with the Company's 2023 CIP performance. According to the Company, CenterPoint achieved energy savings in 2023 of 2,009,051 dekatherms (Dth) resulting in an estimated \$84,506,619 of net benefits before the requested incentive.² This savings is equal to 1.35% of the Company's three-year weather-normalized sales. Based on the terms and conditions of its approved DSM incentive plan, CenterPoint requested approval of a 2023 financial incentive of \$8,450,662.

CenterPoint stated it excluded \$694,872 of Next Generation Energy Act assessments from the calculation of net benefits, consistent with the Commission's December 9, 2020 *Order*.³ In addition, CenterPoint excluded costs and benefits associated with the Company's EnerChange and Energy Smart programs, also consistent with the Commission's December 9th Order.⁴

² *Petition*, Page 58

³ *Petition*, Page 57-58

⁴ *Petition*, Page 57-58

The Department's technical analysis of the demand and energy savings that underpin CenterPoint's proposed Shared Savings 2023 Demand Side Management financial incentive is ongoing and will not be completed before the instant comments are due. The existence of this lag between the Company's request for recovery of the incentive and the completion of the Department's review is a recurring phenomenon. In 2023, the Department compensated for this lag by simply assuming CenterPoint's claimed energy savings for 2022 were correct as filed, with the intent to make any adjustments approved by the Deputy Commissioner of the Department. However, the Deputy Commissioner approved CenterPoint's 2022 Status Report, covering 2022 CIP activity, without any adjustments in Docket No. G011/CIP-20-479, and thus none are required in this docket.⁵

On June 24, 2024, Department staff recommended that the Deputy Commissioner accept CenterPoint's 2023 Status Report. If any adjustments should be required in the Deputy Commissioner's final decision, the Department will account for those in comments on the Company's 2024 filing.

The Department's review indicates that the Company correctly calculated its DSM financial incentive for 2023 CIP achievements and did not exceed either of the caps. Therefore, the Department recommends that the Commission approve CenterPoint's 2023 Shared Savings financial incentive of \$8,450,662.

C. CENTERPOINT'S PROPOSED 2023 CIP TRACKER ACCOUNT

In its *Petition*, CenterPoint requested approval of its report on recoveries and expenditures included in the Company's CIP tracker account balance during 2023. Activity in CenterPoint's CIP tracker account during 2023 can be found in Attachment C of the utility's *Petition* and is summarized below in Department Table 1.

Department Table 1: A Summary of CenterPoint's 2023 CIP Tracker Account

Beginning Balance – January 1, 2023	\$6,015,525
Total CIP Expenses – January 1, 2023 – December 31, 2023 ⁶	\$42,710,890
Carrying Charges – January 1, 2023 – December 31, 2023	(\$19,737)
DSM Financial Incentive	\$7,673,591
CIP Recoveries – January 1, 2023 – December 31, 2023	(\$50,248,562)
Ending Balance – December 31, 2023	\$6,131,707

The Department reviewed Attachment C of the *Petition* and concludes that the Company correctly calculated its 2023 CIP Tracker account. Therefore, the Department recommends the Commission approve CenterPoint's 2023 CIP tracker, resulting in a year-end balance of \$6,131,707.

⁵ Approved by the Department's Deputy Commissioner on August 7, 2023.

⁶ The Tracker Account Total CIP Expenditures of \$42,710,890 includes Next Generation Assessments and EnerChange and Energy Smart Programs.

The Department requests that in future years, the Company provide the CIP tracker (in this case, for year 2023) in an excel spreadsheet with all formula intact.

D. CENTERPOINT'S PROPOSED CHANGE TO ITS CURRENTLY APPROVED CCRA

Minnesota law states, in relevant part, the Commission “may permit a public utility to file rate schedules for annual recovery of the cost of energy conservation improvements.”⁷ This annual CIP recovery mechanism is generally referred to as the Conservation Cost Recovery Adjustment or CCRA.

On September 5, 2023, the Commission approved CenterPoint’s request to implement the CCRA in the amount of \$0.0926 per dekatherm (“Dth”), which went into effect on October 1, 2023. CenterPoint proposes to increase the CCRA to \$0.1704 per Dth beginning October 1, 2024. This rate is designed to reduce the CIP Tracker balance as close to zero as possible by the end of 2025. In the event that Commission approval of the proposed adjustment is delayed beyond September 20, 2024 (in order to implement the rate change by October 1), the Company proposes to continue to apply the current CIP Adjustment of \$0.0926 per Dth up to the first of the month following Commission approval of a revised factor.

The Company based the proposed CCRA factor on projected CIP spending and recovery for 2024 and 2025. On December 1, 2023, the Department approved the Company’s 2024-2026 ECO Triennial Plan. For both 2024 and 2025, CIP spending was based on the currently approved budget for 2024 of \$56,731,213 and the 2024 Minnesota Efficient Technology Accelerator budget of \$1,121,321, except for January through March in 2024, which reflect actual spending, and the currently approved budget for 2025 of \$60,027,102 and the 2025 Minnesota Efficient Technology Accelerator estimated budget of \$2,084,884. The Company calculated carrying charges using the settlement short-term debt interest factor (0.39%) from the Company’s 2021 rate case for the rest of 2023 and 2024.

The Department concludes the Proposed CCRA factor will bring the CIP tracker closer to zero by the end of 2025 and therefore is reasonable. The Department recommends the Commission approve the proposed CCRA of \$0.1704 per Dth.

E. HISTORY OF CENTERPOINT'S CIP ACHIEVEMENTS AND FINANCIAL INCENTIVES 2011-2023

In Attachment A, the Department presents a historical comparison of CenterPoint’s CIP and DSM activities during the period of 2011 through 2023. This table provides an indication of how the Company’s achieved energy savings, CIP expenditures, Shared Savings financial incentive, carrying charges, and year-end tracker balance changed over time. Select statistics from Attachment A are presented in Table 2:

⁷ See Minn. Stat. § 216B.16, subd.6b paragraph (c).

Department Table 2: Savings, Expenditures, and Incentives for Select Years, 2011-2023

	Achieved Energy Savings (DTH)	CIP Expenditures	DSM Financial Incentive
2023	2,009,051	\$41,484,184	\$8,450,662
2022	2,003,321	\$40,041,875	\$7,673,591
2011	1,488,231	\$18,719,923	\$4,590,392
Average 2021-2023	1,961,294	\$40,365,163	\$7,965,258
Average 2011-2013	1,467,589	\$20,540,827	\$6,229,311
Compare 2023 to 2022	0.29%	3.60%	10.13%
Compare 2023 to 2011	35%	121.60%	84.10%
Compare 2023 to Avg 2021-2023	2.44%	2.77%	6.09%
Compare Avg 2021-2023 to Avg 2011-2013	33.64%	96.51%	27.87%

Department Table 3 shows that in 2023:

- CenterPoint’s achieved energy savings were 0.29% higher than the Company’s 2022 achieved energy savings;
- CenterPoint’s 2023 CIP expenditures increased by 3.60% and the DSM financial incentive increased by 10.13%;
- Comparing 2023 to a three-year 2021-2023 average; CenterPoint’s achieved energy savings increased 2.44%, CIP expenditures increased 2.77% and the Company’s Shared Savings DSM financial incentive increased 6.09%;
- Comparing 2023 to 2011 CenterPoint increased its achieved energy savings by 35%, expenditures have increased by 121.60% and the Shared Savings DSM financial incentive has decreased 84.10%.

III. RECOMMENDATIONS

The Department concludes CenterPoint’s filing is generally reasonable.

The Department recommends the Commission take the following action:

1. Approve a 2023 DSM financial incentive of \$8,450,662 to be included in the Company’ tracker account no sooner than the issue date of the Commission’s Order in the instant docket;
2. Approve CenterPoint’s 2023 CIP tracker account activities as summarized in Table 1 above with a December 31, 2023, ending over-recovery balance of \$6,131,707;
3. Approve the revised gas CCRA of \$0.1704 per Dth for all of CenterPoint’s Minnesota customer classes, effective October 1, 2024, or the first billing cycle in the month following the Commission’s Order, in this matter, whichever is later;

4. Approve CenterPoint's customer notification message that reads as follows; and

The PUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of \$0.01704 per therm. This charge will be used to fund energy conservation activities and has been added to your delivery charge. For more information, please call or visit our website.

5. Require CenterPoint to submit a compliance filing with tariff sheets including all necessary calculations within 10 days of the issue date of this Order.

Attachment A, Table 1. CenterPoint Energy's Natural Gas Historical CIP Achievements, Incentives, and Tracker Balance 2007-2023

Line No.	1	3	4	5	6	7	8	9	10	11	12	13
Year	Achieved Energy Savings (Dth)	CIP Expenditures	Net Benefits	DSM Financial Incentive	Carrying Charges	Year-End Tracker Balance	Average cost per first-year Dth Saved	Average cost per Dth Saved (including incentives)	Incentive as a % of CIP Expenditures	Incentive as a % of Net Benefits	Carrying Charges as a % of Expenditures	Year-End Tracker Balance as a % of Expenditures
2007	825,030	\$7,553,362	\$84,229,798	\$530,405	NA		\$9.16	\$9.80	7%	1%	NA	0%
2008	827,340	\$8,391,297	\$75,518,736	\$484,182	NA	\$8,147,421	\$10.14	\$10.73	6%	1%	NA	97%
2009	938,978	\$10,117,898	\$97,044,437	\$1,394,200	\$507,115	\$6,879,416	\$10.78	\$12.26	14%	1%	5%	68%
2010	1,300,228	\$16,574,737	\$69,366,886	\$3,493,921	\$296,465	\$10,216,655	\$12.75	\$15.43	21%	5%	2%	62%
2011	1,488,231	\$18,719,923	\$65,031,976	\$4,590,392	\$450,945	\$9,248,025	\$12.58	\$15.66	25%	7%	2%	49%
2012	1,330,518	\$19,680,178	\$54,350,138	\$3,207,411	\$418,624	\$14,225,552	\$14.79	\$17.20	16%	6%	2%	72%
2013	1,584,019	\$23,222,379	\$88,349,823	\$10,890,131	\$344,598	\$8,501,064	\$14.66	\$21.54	47%	12%	1%	37%
2014	1,701,716	\$24,352,083	\$80,928,431	\$11,608,486	(\$443,194)	\$2,285,733	\$14.31	\$21.13	48%	14%	-2%	9%
2015	1,851,930	\$26,394,800	\$75,451,306	\$12,732,019	(\$13,773)	\$2,932,026	\$14.25	\$21.13	48%	17%	0%	11%
2016	2,006,014	\$29,897,277	\$97,070,376	\$13,791,346	(\$8,953)	\$7,461,117	\$14.90	\$21.78	46%	14%	0%	25%
2017	2,632,545	\$32,131,251	\$160,452,310	\$12,456,038	(\$19,848)	\$3,899,087	\$12.21	\$16.94	39%	8%	0%	12%
2018	1,980,534	\$34,888,321	\$94,309,789	\$11,317,175	\$98,415	\$6,096,809	\$17.62	\$23.33	32%	12%	0%	17%
2019	2,020,149	\$37,252,502	\$87,584,011	\$8,758,401	(\$208,700)	(\$2,715,768)	\$18.44	\$22.78	24%	10%	-1%	-7%
2020	1,915,114	\$35,993,594	\$99,357,233	\$9,935,723	(\$120,610)	\$1,952,441	\$19.00	\$23.98	28%	10%	0%	5%
2021	1,871,509	\$39,569,431	\$77,715,201	\$7,771,520	(\$84,991)	\$11,164,791	\$20.54	\$24.69	20%	10%	0%	29%
2022	2,003,321	\$40,041,875	\$76,735,907	\$7,673,591	(\$44,869)	\$6,015,525	\$19.50	\$23.33	19%	10%	0%	15%
2023	2,009,051	\$41,484,184	\$84,506,619	\$8,450,662	(\$19,737)	\$6,131,707	\$20.65	\$24.86	20%	10%	0%	15%

July 26, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G004/M-24-44

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Great Plains Natural Gas Company's 2023 Conservation Improvement Program Tracker and Shared Savings Demand Side Management Incentive (Petition).

Great Plains Natural Gas Company filed the Petition on May 1, 2024.

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve** Great Plains Natural Gas Company's Petition. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Energy Regulatory Analysis

HJ/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G004/M-24-44

I. INTRODUCTION

On May 1, 2024 Great Plains Natural Gas Company (Great Plains, GP, or the Company) submitted its 2023 Conservation Improvement Program (CIP) Status Report, CIP Tracker, and Demand Side Management (DSM) Incentive to the Minnesota Public Utilities Commission (Commission). The Company's filing (Petition) included the following:

- Expenditures, as recorded in the CIP tracker account for 2023, and the recovery proposed by the Company; and
- A proposed increase in its Conservation Cost Recovery Adjustment (CCRA) to \$0.0202 per dekatherm beginning September 1, 2024.

In addition, Sections I and II of the Petition contain the Company's 2023 CIP Status Report. The 2023 CIP Status Report is intended to fulfill the annual reporting requirements outlined in Minnesota Rule 7690.0550. Because the Company's CIP Status Reports do not require Commission review or approval, this portion of the Petition has been assigned a separate docket number under which the Department will conduct additional analyses.¹

II. DEPARTMENT ANALYSIS

A. UPDATE ON MINNESOTA'S CONSERVATION STATUTES AND PROGRAMS

In 2021, the Minnesota Legislature passed the Energy Conservation and Optimization (ECO) Act. This act updated Minnesota's existing "CIP" Statutes, which have since become known as the "ECO" statutes. Subsequently, the state's Conservation Improvement Program (CIP) was re-branded as the state's Energy Conservation and Optimization (ECO) program. As a result, GP's triennial filing governing the 2021-2023 years was considered a "CIP" Triennial Filing, but the most recent triennial filing covering years 2024-2026, which should be considered its first "ECO" Triennial Filing, was still filed as a "CIP" Triennial Filing. The Department notes that future GP Status Reports should incorporate the "ECO" language change.

The ECO Statutes impacting Investor-Owned Utilities are as follows:

- Minnesota Statutes 216B.2401 (Energy Savings and Optimization Policy Goal);
- Minnesota Statutes 216B.2402 (Definitions);

¹ See Docket No. G004/CIP-20-477.

- Minnesota Statutes 216B.241 (Public Utilities; Energy Conservation and Optimization);
- Minnesota Statutes 216B.2411 (Distributed Energy Resources); and
- Minnesota Statutes 216B.2412 (Decoupling of Energy Sales from Revenues).

The Department's review of the Company's Shared Savings Financial Incentive will impact next year's 2024 filing, as that future review will incorporate the Commission's January 25, 2024 Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan from Docket No. E,G999-CI-08-133, which will be effective for 2024 to 2026 shared savings (In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation).

B. COMPLIANCE WITH PRIOR COMMISSION ORDERS

On September 5, 2023, the Commission issued its [Order](#) in Docket No. G004/M-23-186 for Great Plains' 2022 CIP Tracker Account and Shared Savings DSM Incentive. That Order:

1. Approved Great Plains Natural Gas Company's 2022 CIP tracker account, as summarized in Table 1 of the Department's August 7, 2023, comments of the Department, resulting in a 2022 CIP tracker balance of (\$347,656).
2. Approved a CCRA rate of \$(0.0096) per Dth, to be effective September 1, 2023, or the first billing cycle after the Commission's determination in this matter.
3. Required Great Plains Natural Gas Company to include the following bill message in the billing month immediately following the date of the Order in the current docket:
Great Plains recovers the cost changes in its energy conservation programs, from the base established in our most recent general rate case, through a Conservation Cost Recovery Adjustment (CCRA) subject to MN Public Utilities Commission approval. A CCRA of [insert rate] per dk as shown in the Resource Adjustment above is effective [insert effective date]. Learn more about reducing your energy use by visiting our website at www.gpng.com or calling us at 1-877-267-4764.
4. Required Great Plains Natural Gas Company to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determination in this matter.

Additionally, in response to past CIP filings, the Commission has directed Great Plains to provide certain information in all future CIP filings. Those directives require Great Plains to:²

- Update the interest rate used to calculate carrying charges to match the short-term cost of debt approved by the Commission in the Company's most recent rate case;
- Use a CCRA calculation methodology that adequately accounts for carrying charges associated with the financial incentive; and
- Calculate the CCRA based on the existing tracker balance as well as projected sales, expenditures, financial incentive(s), and any pertinent adjustments that may occur over the period the CCRA will be in place.

Based on its review, the Department concludes that the Company's current Petition has complied with the requirements outlined by the Commission.

C. *DSM FINANCIAL INCENTIVE CALCULATION*

1. *Background on the DSM Financial Incentive*

On December 9, 2020, the Commission approved the parameters for the Shared Savings Financial Incentive Mechanism covering the 2021-2023 CIP triennial (December 9th Order).³ The Commission capped electric and gas incentives at 10 percent of net benefits and 30 percent of expenditures. The December 9th Order also allowed for the expenditure cap to exceed the 30 percent cap up to a maximum of 35 percent, if a gas utility meets or exceeds energy savings equaling 1.2 percent of retail sales. For more details about the December 9th Order, see Department Attachment A.

2. *Great Plains' Proposed Shared Savings DSM Financial Incentive*

Under the Commission's approved Shared Savings DSM financial plan, Great Plains may request Commission approval of a performance incentive based on the energy savings as a percent of CIP applicable retail sales the Company achieves under its approved gas CIP. The plan directly links the incentive to the Company's performance in achieving cost effective conservation.

In its Petition, Great Plains calculated a 2023 DSM financial incentive award of \$278,241⁴. The Company explained that its energy savings totaled 85,711 dekatherms, resulting in a savings achievement level of 1.41 percent,⁵ which surpassed the 0.70 percent (or greater than 42,629 dk) threshold required to receive the incentive. Great Plains reported that in 2023, the Company's CIP expenditures were \$877,986 and estimated net benefits were \$2,782,406.⁶ The Department confirmed Great Plains' calculation of the Company's energy savings achievement level and concludes that the

² These requirements were established by the Commission's November 23, 2016 [Order](#) Approving Tracker Account, Approving Financial Incentive, Setting Carrying-Charge Rate, and Setting Conservation Cost Recovery Adjustment in Docket No. G004/M-16-384.

³ See Commission's December 9, 2020 [Order](#) in Docket No. E,G999/CI-08-133.

⁴ $(\$2,782,406 \text{ net benefits} * 10\%) = \$278,240.60$

⁵ $(85,711 \text{ Dth} / 6,089,861 \text{ Dth}) = 0.0140743770670628 * 100 = 1.41\%$

⁶ Petition, Page 12, Section III.

Company did qualify for the DSM financial incentive award in 2023. If approved, the Company will include the financial incentive of \$278,241 as an expense in the 2025 CIP Tracker and Demand Side Management Incentive.⁷

In most years, there is a lag between the Great Plains' request for recovery of an incentive and the completion of the Department's engineering-oriented analysis of the demand and energy savings that underpin the proposed incentive. However, in last year's review, the Department compensated for this lag by simply assuming Great Plains' claimed energy savings for 2022 were correct as filed, with the intent to make in the current filing, any adjustments approved by the Deputy Commissioner of the Department.

The Deputy Commissioner approved Great Plains' 2022 Status Report without adjustments in Docket No. G004/CIP-20-477,⁸ so no adjustments are required for 2022 activities.

On June 24, 2024, the Department's CIP/ECO staff recommended the Deputy Commissioner accept Great Plains' 2023 Status Report. If any adjustments should be required in the Deputy Commissioner's final decision, the Department will account for those in the Company's 2024 filing.

D. GREAT PLAINS' CIP TRACKER ACCOUNT

In its Petition, Great Plains submitted for approval the recoveries and expenditures recorded in the Company's CIP tracker account during 2023.

Table 1 below provides a summary of 2023 activities.

Table 1: Summary of Great Plains' CIP Tracker Account in 2023⁹

Line	Description	Time Period	Amount
1	Beginning Balance	Jan. 1, 2023	(\$347,656)
2	CIP Expenses	Jan. 1 2023 – Dec. 31, 2023	\$876,653
3	DSM Financial Incentive ¹⁰	Approved in 2023 for 2022 Activities	\$0
4	Carrying Charges	Jan. 1 2023 – Dec. 31 2023	(\$26,512)
5	CIP Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	Jan. 1 2023 – Dec. 31 2023	\$502,485
6	CCRC Recovery	Jan. 1 2023 – Dec. 31, 2023	\$515,270
7	CCRA Recovery	Jan. 1 2023 – Dec. 31, 2023	\$388,387
8	CIP Revenues Subtotal [Line 6 + Line 7]	Jan. 1 2023 – Dec. 31, 2023	\$903,657
9	Ending Balance [Line 5 – Line 8]	Dec. 31, 2023	(\$401,172)

⁷ Petition, Page 12, Section IV.

⁸ Approved by the Department's Deputy Commissioner on [August 7, 2023](#).

⁹ Petition, Attachment D, page 4.

¹⁰ Upon Commission approval the Company will include the 2023 financial incentive of \$278,241 in the 2025 CIP tracker.

The Company calculated carrying charges using the short-term cost of debt rate, which was approved in Great Plains' most recent rate case in Docket No. G004/GR-19-511. The annual short-term debt rate is 3.693 percent, which when divided by 12 months, results in the 0.30775 percent monthly carrying rate applied by the Company to the CIP tracker for each month in 2023. Great Plains CIP tracker balance showed an over-recovery of CIP costs for all months of calendar year 2023, meaning that carrying charges accrue to ratepayers.

The Department reviewed the CIP tracker and found no calculation errors. The Department recommends the Commission approve Great Plains' 2023 tracker account as summarized in Table 1, resulting in an ending balance of (\$401,172).

E. GREAT PLAINS' CONSERVATION COST RECOVERY ADJUSTMENT

Minnesota Statutes 2016B.16., Subd. 6b(c) states that the Commission "may permit a public utility to file rate schedules providing for annual recovery of the costs of energy conservation improvements." This CIP recovery mechanism is referred to as the Conservation Cost Recovery Adjustment (CCRA), CIP Rider, or CIP Surcharge. The Department reviews the CCRA proposed by Great Plains each year in the Company's annual CIP filing.

1. Great Plains' CCRA Proposal

Great Plains' CCRA would ideally be set at a rate that brings the Company's CIP tracker balance as close to zero as possible. Doing so avoids significant over or under recovery of CIP costs by the Company, thus minimizing carrying charges and stabilizing CCRA rates. After observing the Company's relatively high CIP tracker balances over several earlier years, in 2016 the Department recommended Great Plains use a forward-looking rather than backward-looking methodology to calculate the Company's CCRA.¹¹ Using a forward-looking methodology helps maintain a CIP tracker balance closer to zero, minimize carrying charges, and account for CIP expense fluctuations. The Commission agreed with the Department's recommendations and directed the Company "to calculate the CCRA based on the existing tracker balance, as well as the projected sales, expenditures, financial incentive(s), and any pertinent adjustments that may occur over the period the CCRA will be in place."¹² Although the CIP tracker balance still fluctuates year to year, a certain degree of this is to be expected. Thus far, the forward-looking approach appears to be reasonably effective at keeping the CIP tracker relatively close to zero.

In its Petition, Great Plains reported an over-recovered CIP tracker balance of (\$401,172) at the end of the 2023 calendar year. Accordingly, Great Plains has requested approval for a revised CCRA rate of \$0.0202 per Dth, which translates to a \$0.0298 increase from the current CCRA of (\$0.0096) per Dth. If the proposed rate were implemented on September 1, 2024 as proposed, the Company's year-end 2024 tracker balance would be \$111,770, as shown in the following table.

¹¹ See Department's [Comments](#) in Docket No. G004/M-16-384.

¹² Commission [Order](#) in Docket No. G004/M-16-384, Item 6.

Table 2: Great Plains’ projected 2024 CIP tracker account, using the current CCRA and CCRC rates (April-December values estimated)¹³

Line	Description	Time Period	Amount
1	Beginning Balance	Jan. 1, 2024	(\$401,172)
2	CIP Expenses	Jan. 1, 2024 – Dec. 31, 2024	\$1,014,719
3	DSM Financial Incentive	Approved in 2024 for 2023 activities	\$0
4	Carrying Charges	Jan. 1, 2024 – Dec. 31, 2024	(\$15,261)
5	CIP Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	Jan. 1, 2024 – Dec. 31, 2024	\$598,286
6	CCRC Recovery	Jan. 1, 2024 – Dec. 31, 2024	\$474,604
7	CCRA Recovery	Jan. 1, 2024 – Dec. 31, 2024	\$11,912
8	CIP Revenues Subtotal [Line 6 + Line 7]	Jan. 1, 2024 – Dec. 31, 2024	\$486,516
9	Ending Balance [Line 5 - Line 8]	Dec. 31, 2024	\$111,770

The projected data in Table 2 demonstrate that the Company anticipates increasing its December 31, 2024 CIP tracker balance an estimated \$512,942¹⁴ by December 31, 2024, with an ending tracker balance of \$111,770 which is closer to the ideal \$0 balance.

Table 3: Great Plains’ Calculation of the Company’s Proposed CCRA Rate

Line	Description	Time Period	Amount
1	Beginning Balance	Sept. 1, 2024	(\$409,955)
2	CIP Expenses	Sept. 1, 2024 – Aug. 31, 2025	\$1,016,307
3	DSM Financial Incentive	Approved in 2024 for 2023 Activities	\$0
4	Carrying Charges	Sept. 1, 2024 – Aug. 31, 2025	(\$4,279)
5	CIP Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	Sept. 1, 2024 – Aug. 31, 2025	\$602,073
6	CCRC Recovery	Sept. 1, 2024 – Aug. 31, 2025	\$482,802
7	Remaining Amount to be Recovered through CCRA [Line 5 – Line 6]	Sept. 1, 2024 – Aug. 31, 2025	\$119,271 ¹⁵
8	Projected Sales (Dth)	Sept. 1, 2024 – Aug. 31, 2025	5,902,214
9	Proposed CCRA Rate (\$/Dth) [Line 7/Line 8]	Effective Sept. 1, 2024	\$0.0202

¹³ Data in Table 2 retrieved from Petition, Attachment D.

¹⁴ \$111,770 – (-\$401,172) = \$512,942

¹⁵ This ties to the Company’s CCRA recovery of \$119,225 and forecasted ending balance on August 31, 2025 of \$46, as shown on Attachment D, page 3 of 4.

As shown in Table 3, the proposed rate was derived by assuming a CCRA under recovery of \$119,271 over a 12-month period from September 1, 2024 to August 31, 2025, with 5,902,214 Dth in sales.¹⁶ As a result of the requested CCRA increase, the average residential customer using 75.9 Dth per year would pay a total annual CIP cost of \$7.74, representing a \$2.26 increase from the current total annual CIP cost of \$5.48.¹⁷ Table 3 provides details behind Great Plains' calculation of its proposed CCRA rate of \$0.0202, an increase of \$0.0298 from the current rate of (\$0.0096).¹⁸

The Department supports the Company's proposal to implement a CCRA rate of \$0.0202, as this will help Great Plains to bring the tracker balance close to \$0.

2. Customer Notification Method for the CCRA Proposal

In addition to updating the relevant tariff sheet, the Department recommends that the Commission require the Company to include the following bill message in the billing month immediately following the date of the Commission's Order:

Great Plains recovers the cost change in its energy conservation programs, from the base established in our most recent general rate case, through a Conservation Cost Recovery Adjustment (CCRA) subject to MN Public Utilities Commission approval. A CCRA of [insert rate] per dk, as shown in the Resource Adjustment above, is effective [insert date]. Learn more about reducing your energy use by visiting our website at www.gpng.com or calling us at 1-877-267-4764.

F. REVIEW OF GREAT PLAINS' DSM AND CIP DATA OVER TIME (2007 - 2023)

The Department's Attachment B to these Comments provides a historical comparison of Great Plains' DSM and CIP activities from 2007 (the year of the passage of the Next Generation Energy Act) through 2023. Attachment B shows how the Company's carrying charges, year-end tracker balances, DSM financial incentives, CIP expenditures, and energy savings have changed over time. As noted in prior Department comments, Great Plains' CIP expenditures and the corresponding energy savings have fluctuated each year between 2007 and 2023, without demonstrating a consistent increasing or decreasing pattern.

The Department further examined energy savings, demand savings, expenditures, and incentive values for select years between 2007 and 2023. In Table 4 below, the Department compared 2023 values to

¹⁶ See Petition, Attachment D, page 1-2 for these figures.

¹⁷ Total estimated annual CIP costs include both CCRC and CCRA charges. The current CCRC rate is \$0.0818/Dth, authorized in Docket No. G004/GR-19-511, effective April 1, 2021.

¹⁸ Total estimated annual CIP costs include both CCRC and CCRA charges. The current CCRA rate is (\$0.0096)/Dth, authorized in Docket No. G004/M-23-186, effective October 1, 2023.

2022 values, 2023 values to average 2021-2023 values, and average 2021-2023 values to average 2011-2013 values.

Table 4: Savings, Expenditures, and Incentives for Selected Years, 2011-2023

	Energy Savings (dk)	CIP Expenditures	Shared Savings Incentive
2023	85,711	\$877,986	\$278,241
2022	22,575	\$523,005	\$0
Average 2021-2023	41,147	\$620,891	\$92,747
Average 2011-2013	27,027	\$383,686	\$58,869
Compare 2023 to 2022	280%	67.9%	NA
Compare 2023 to Avg. 2021-2023	108%	41.4%	200%
Compare Avg. 2021-2023 to Avg. 2011-2013	52.2%	61.8%	57.5%

The Department observes that Great Plains' energy savings and expenditures increased significantly from 2022 to 2023. Further, for 2023 the increase in savings was much higher at 280 percent than the increase in expenditures at 67.9 percent. Great Plains did not qualify for an incentive in 2022 but did qualify in 2023.

When comparing 2023 to the average values for years 2021-2023, the Department observes that expenditures increased by about 41 percent. Savings for 2023 versus average 2021-2023 shows that savings is considerably greater at about 62 percent.

When comparing 2011-2013 averages to 2021-2023 averages, it is notable that Great Plains' spending increased by about 62 percent and its savings increased by about 52 percent. This indicates that the Company is having to spend more to achieve the same amount of savings, compared to ten years ago. This may be a contributing factor to the Company's change in financial incentive, as ten years ago the average incentive was \$58,869 versus the most recent years average of \$92,747.

III. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

Based on its review of the Great Plains Natural Gas Company's Petition, the Department recommends that the Commission take the following actions:

- Approve Great Plains Natural Gas Company's 2023 CIP tracker account, as summarized in Table 1 of these Comments, resulting in a 2023 CIP tracker year-end balance of (\$401,172);
- Approve a CCRA rate of \$0.0202 per Dth, to be effective September 1, 2024, or the first billing cycle after the Commission's determination in this matter;

- If the proposed CCRA rate is approved, require Great Plains Natural Gas Company to include the following bill message in the billing month immediately following the date of the Order in the current docket:
 - Great Plains recovers the cost changes in its energy conservation programs, from the base established in our most recent general rate case, through a Conservation Cost Recovery Adjustment (CCRA) subject to MN Public Utilities Commission approval. A CCRA of [insert rate] per dk as shown in the Resource Adjustment above is effective [insert date]. Learn more about reducing your energy use by visiting our website at www.gpng.com or calling us at 1-877-267-4764.
- Require Great Plains Natural Gas Company to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

The December 9, 2020 Order (December 9, 2020)
Docket No. E,G999/CI-08-133

- A. For electric utilities, the 2021 -2023 triennium plan is as follows:
- 1) Authorize financial incentives for a utility that achieves energy savings of at least 1.0 percent of the utility's retail sales.
 - 2) For a utility that achieves energy savings equal to 1.0 percent of retail sales, award the utility a share of the net benefits as set forth in Attachment A.
 - 3) For each additional 0.1 percent of energy savings, the utility achieves, increase the net benefits awarded to the utility by an additional 0.75 percent until the utility achieves savings of 1.7 percent of retail sales.
 - 4) For savings levels of 1.7 percent and higher, award the utility a share of the net benefits equal to the Net Benefits Cap.
 - 5) Electric utilities may exceed the 30% CIP Expenditures Cap, up to a maximum of 35%, if they meet or exceed energy savings equaling 2% of retail sales.
- B. For Gas utilities, the 2021 -2023 triennium plan is as follows:
- 1) Authorize financial incentives for a utility that achieves energy savings of at least 0.7 percent of the utility's retail sales.
 - 2) For a utility that achieves energy savings equal to 0.7 percent of retail sales, award the utility a share of the net benefits as set forth in Attachment A.
 - 3) For each additional 0.1 percent of energy savings the utility achieves, increase the net benefits awarded to the utility by an additional 0.75 percent until the utility achieves savings of 1.2 percent of retail sales.
 - 4) For savings levels of 1.2 percent and higher, award the utility a share of the net benefits equal to the Net Benefits Cap.
 - 5) Gas utilities may exceed the 30% CIP Expenditures Cap, up to a maximum of 35%, if they meet or exceed energy savings equaling 1.2% of retail sales.
- C. For all utilities, set the following Net Benefit Caps:
- 1) 13.5 percent in 2017,
 - 2) 12.0 percent in 2018,
 - 3) 10.0 percent in 2019, and
 - 4) 10.0 percent in 2020.
- D. For all utilities, set the following Conservation Improvement Plan (CIP) Expenditure Caps:
- 1) 40 percent in 2017,
 - 2) 35 percent in 2018,
 - 3) 30 percent in 2019, and
 - 4) 30 percent in 2020.

The Commission retains certain provisions from the current Shared Savings DSM Financial

Incentive Plan, with slight modifications, as follows:

- CIP-exempt customers shall not be allocated costs for the new shared savings incentive. Sales to CIP-exempt customers shall not be included in the calculation of utility energy savings goals.
- If a utility elects not to include a third-party CIP project, the utility cannot change its election until the beginning of subsequent years.
- If a utility elects to include a third-party project, the project's net benefits and savings will be included in the calculation of the energy savings and will count toward the 1.5 percent savings goal.
- The energy savings, cost, and benefits of modifications to non-third-party projects will be included in the calculation of a utility's DSM incentive.
- The costs of any mandated, non-third-party projects (e.g., the 2007 Next Generation Energy Act assessments,¹ University of Minnesota Initiative for Renewable Energy and the Environment costs²) shall be excluded from the calculation of net benefits and energy savings achieved and incentive awarded.
- Costs, energy savings, and energy production related to Electric Utility Infrastructure Costs,³ solar installation⁴ and biomethane purchases⁵ shall not be included in energy savings for DSM financial incentive purposes.
- The Commission requests that the Department continue a stakeholder process, under the current docket, to evaluate ways of improving the shared-savings mechanisms for potential adoption in the 2024–2026 triennium including, but not limited to, discussion of:
 - a. Incorporation of lifetime energy savings into the incentive mechanism,
 - b. Incorporation of an incentive for utilities that achieve permanent peak reductions through the shared-savings incentive mechanism,
 - c. Comparison of alternative mechanisms, along with the approved 2021-2023 CIP financial incentive mechanism, to each other and to how a similar-sized (in terms of cost) supply-side investment would be rewarded financially through the cost-of-service model, and
 - d. Energy efficiency opportunities to support increased load flexibility (the ability to persistently shape and shift load).

¹ See 2007 Laws, art. 2

² *Id.*, § 3, subd. 6.

³ Minn. Stat. § 216B.1636

⁴ Minn. Stat. § 216B.241, subd. 5a.

⁵ *Id.*, subd. 5b.

The new Shared Savings DSM Incentive Plan shall be in effect for 2021 - 2023.

Utilities may discontinue the annual February 1 compliance filing because a scale of net benefits will no longer be required since the Department's proposal sets percentages at certain savings thresholds and calibrates the mechanism to dollars per unit of energy.

Attachment B, Table 1: Great Plains' Historical CIP Achievements, Incentives, and Tracker Balance, 2007-2023

Column ID		A	B	C	D	E	F	G	H	I	J
Year	GP CIP Docket Number	CIP Expenditures (Excluding Incentives)	Achieved Energy Savings (Dekatherms)	CIP Expenditures (Excluding Incentives) per Dekatherm Saved (A/B)=C	DSM Financial Incentive	Total CIP Cost per Dekatherm Saved (A+D)/B	DSM Financial Incentive as a % of CIP Expenditures (D/A)=F	Carrying Charges	Carrying Charges as a % of CIP Expenditures (G/A)=H	Year-End Tracker Balance	Year-End Tracker Balance as a % of CIP Expenditures (I/A)=J
2007	08-480	\$ 244,304	17,658	\$ 13.84	\$ 65,828	\$ 17.56	26.95%				
2008	09-508	\$ 256,468	9,524	\$ 26.93	\$ -	\$ 26.93	0.00%				
	10-418,										
2009	10-419	\$ 186,584	7,975	\$ 23.40	\$ -	\$ 23.40	0.00%				
2010	11-404	\$ 427,847	17,426	\$ 24.55	\$ 18,915	\$ 25.64	4.42%	\$ (7,527)	-1.8%	\$ 52,659	12.3%
2011	12-439	\$ 370,570	24,604	\$ 15.06	\$ 37,707	\$ 16.59	10.18%	\$ 10,979	3.0%	\$ 324,363	87.5%
2012	13-334	\$ 401,694	41,509	\$ 9.68	\$ 114,763	\$ 12.44	28.57%	\$ 24,008	6.0%	\$ 369,299	91.9%
2013	14-358	\$ 378,794	14,969	\$ 25.31	\$ 24,137	\$ 26.92	6.37%	\$ 27,097	7.2%	\$ 397,382	104.9%
2014	15-422	\$ 327,380	19,788	\$ 16.54	\$ 42,180	\$ 18.68	12.88%	\$ 9,732	3.0%	\$ (49,755)	-15.2%
2015	16-384	\$ 724,644	69,393	\$ 10.44	\$ 477,077	\$ 17.32	65.84%	\$ (1,094)	-0.2%	\$ 241,051	33.3%
2016	17-338	\$ 642,143	56,669	\$ 11.33	\$ 345,928	\$ 17.44	53.87%	\$ 2,346	0.4%	\$ 1,060,837	165.2%
2017	18-118	\$ 403,118	13,577	\$ 29.69	\$ -	\$ 29.69	0.00%	\$ 8,659	2.1%	\$ 224,198	55.6%
2018	19-287	\$ 566,621	36,083	\$ 15.70	\$ -	\$ 15.70	0.00%	\$ (9,581)	-1.7%	\$ (830,804)	-146.6%
2019	20-448	\$ 499,310	13,175	\$ 37.90	\$ -	\$ 37.90	0.00%	\$ (14,083)	-2.8%	\$ (713,193)	-142.8%
2020	21-305	\$ 503,433	20,537	\$ 24.51	\$ -	\$ 24.51	0.00%	\$ (9,855)	-2.0%	\$ (348,197)	-69.2%
2021	22-217	\$ 461,682	15,154	\$ 30.47	\$ -	\$ 30.47	0.00%	\$ (7,141)	-1.5%	\$ (12,717)	-2.8%
2022	23-186	\$ 523,005	22,575	\$ 23.17	\$ -	\$ 23.17	0.00%	\$ (8,627)	-1.6%	\$ (347,656)	-66.5%
2023	24-44	\$ 877,986	85,711	\$ 10.24	\$ 278,241	\$ 13.49	31.69%	\$ (26,512)	-3.0%	\$ (401,172)	-45.7%

August 1, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G022/M-24-45

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

Greater Minnesota Gas, Inc.'s Petition for Approval of 2023 Energy Conservation and Optimization Program Tracker Account and Proposed Conservation Cost Recovery Adjustment (*Petition*)

The *Petition* was filed on June 5, 2024 by:

Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas, Inc.
1900 Cardinal Lane
Faribault, MN 55021

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve Greater Minnesota Gas's *Petition***. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ DR. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Division of Energy Resources

Docket No. G022/M-24-45

I. SUMMARY OF THE UTILITY'S PROPOSAL

On June 5, 2024, Greater Minnesota Gas, Inc. (GMG or the Company) submitted its Petition for Approval of 2023 Energy Conservation and Optimization (ECO) Program Tracker Account and Proposed Conservation Cost Recovery Adjustment (*Petition*) with the Minnesota Public Utilities Commission (Commission) in Docket No. G022/M-24-45. In its *Petition*, GMG requested that the Commission approve:

- A 2023 ECO program tracker with a year-end balance of \$415,344; and
- A 2024 Conservation Cost Recovery Adjustment (CCRA) of \$0.4407 per dekatherm (Dth), effective on the first day of the month following approval.

The Company also noted its intent to update the previously approved bill message language, revised to reflect the new CCRA, for inclusion with bills in the month immediately following approval.

II. COMMISSION'S 2021 ORDER

On October 22, 2021, the Commission issued its Order approving GMG's 2020 Conservation Improvement Program (CIP) Tracker Account and Conservation Cost Recovery Adjustment,¹ with the following determinations:

1. Approved GMG's 2020 Conservation Improvement Program tracker account, as summarized in Table 1 of the comments of the Minnesota Department of Commerce, with a December 31, 2020 tracker balance of (\$15,200);
2. Approved the implementation of a Conservation Cost Recovery Adjustment of \$0.1965 per dekatherm, effective January 1, 2022;
3. Approved GMG's proposed bill message;
4. Required GMG to submit a filing within 10 days with revised tariff sheets reflecting the Commission's determination in this matter.

On October 22, 2021, GMG submitted its compliance tariff sheets in response to Order Point 4.

¹ See the Commission's October 22, 2021 Order in Docket No. G022/M-21-306.

III. DEPARTMENT ANALYSIS

The Department's analysis of GMG's *Petition* is provided below in the following sections:

- In Section III.A, a review of Minnesota's updated conservation statutes;
- In Section III.B, GMG's proposed reconciliation for its 2023 ECO tracker account;
- In Section III.C, GMG's proposed CCRA for 2024/2025;
- In Section III.D, GMG's historical performance;
- In Section III.E, GMG's proposed bill message.

A. MINNESOTA'S UPDATED CONSERVATION STATUTES

In 2021, the Minnesota Legislature passed the Energy Conservation and Optimization (ECO) Act. This act updated Minnesota's existing "CIP" Statutes, which have since become known as the "ECO" statutes. Subsequently, the state's Conservation Improvement Program (CIP) was re-branded as the state's Energy Conservation and Optimization (ECO) program. As a result, GMG's triennial filing governing the 2021-2023 years was considered a "CIP" Triennial Filing (Docket No. G022/CIP-20-474) and GMG's most recent triennial filing covering years 2024-2026 was considered its first "ECO" Triennial Filing (Docket No. G022/CIP-23-96).

The ECO Statutes impacting Investor-Owned Utilities are as follows:

- Minnesota Statutes § 216B.2401 (Energy Savings and Optimization Policy Goal);
- Minnesota Statutes § 216B.2402 (Definitions);
- Minnesota Statutes § 216B.241 (Public Utilities; Energy Conservation and Optimization);
- Minnesota Statutes § 216B.2411 (Distributed Energy Resources); and
- Minnesota Statutes § 216B.2412 (Decoupling of Energy Sales from Revenues).

The Department has reviewed the ECO Statutes for any changes that potentially impact the Commission. As under the former CIP Statutes, the ECO Statutes grant jurisdiction to the Department for most of the state's conservation activities. However, the Commission continues to have jurisdiction over two specific conservation items relevant to these Comments: the financial incentive and the recovery of ECO (formerly CIP) costs. The Department found no substantive changes to those sections concerning the Commission's authority that would impact this proceeding.

Therefore, the Department has determined that its current review of GMG's *Petition* can proceed as it has in past years.

B. GMG'S PROPOSED 2023 ECO TRACKER ACCOUNT

In its *Petition*, GMG requested approval of its report on recoveries and expenditures included in the Company's ECO tracker account balance during 2023. Activity in GMG's ECO tracker account during 2023 can be found in Attachment A of the utility's *Petition*.

The most recent Commission Order regarding GMG's ECO tracker account approved the account balance as of December 31, 2020.² GMG's *Petition* did not include the actual tracker account data for 2021 and 2022. The Department requested this information from the Company to be able to reconcile the 2023 tracker account. Absent the 2021 and 2022 data, the Department would be unable to determine if the beginning balance used in the Company's 2023 tracker is accurate. The Company provided the tracker account data for 2021 and 2022, which the Department has included with these comments as Attachment 1. The Department incorporates the 2021 and 2022 data into the reconciliation below.

The Company's ECO tracker account balance for the years 2021, 2022, and 2023 is summarized below in Department Table 1.

Department Table 1: A Summary of GMG's 2021-2023 ECO Tracker Account

Line	Description	Time Period	Amount
1	Beginning Balance	January 1, 2021	(\$15,200)
2	ECO Expenses	January 1, 2021 – December 31, 2023	\$1,365,396
3	DSM Financial Incentive	Approved in 2021 – 2023	\$0
4	Carrying Charges	January 1, 2021 – December 31, 2023	\$0
5	ECO Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	January 1, 2021 – December 31, 2023	\$1,350,196
6	CCRC Recovery	January 1, 2021 – December 31, 2023	(\$230,781)
7	CCRA Recovery	January 1, 2021 – December 31, 2023	(\$704,072)
8	ECO Revenues Subtotal [Line 6 + Line 7]	January 1, 2021 – December 31, 2023	(\$934,853)
9	Ending Balance [Line 5 + Line 8]	December 31, 2023	\$415,344

The Department reviewed Attachment A of the *Petition*, along with the 2021 and 2022 data provided by the Company and included with these comments as Attachment 1, and concludes that the Company correctly calculated its 2021, 2022, and 2023 ECO Tracker account. Therefore, the Department recommends the Commission approve GMG's 2021, 2022, and 2023 ECO tracker, resulting in a December 31, 2023 balance of \$415,344.

² See the Commission's October 22, 2021 Order in Docket No. G022/M-21-306.

The Department requests that in future years, the Company provide the ECO tracker for each year since the most recently approved year-end balance (in this case, for year 2023) and provide the tracker in an Excel spreadsheet with all formula intact.

C. GMG'S PROPOSED UPDATED CCRA

The Commission approved GMG's current CCRA of \$0.1965 per dekatherm on October 22, 2021 in Docket No. G022/M-21-306. In its *Petition*, GMG proposed to increase its CCRA from \$0.1965/Dth to \$0.4407/Dth effective on the first day of the month following approval. GMG states that its CCRA is based on a forward-looking calculation targeting a \$0 tracker balance as of December 31, 2025.³

The projected effects of the current and proposed CCRA's to the 2024 and 2025 ECO trackers are shown below in Table 2. GMG's projections assume the proposed CCRA of \$0.4407/Dth is effective September 1, 2024.

Department Table 2: Summary of GMG's 2024-2025 Projections with a CCRA rate of \$0.1965/Dth until August 31, 2024 and \$0.4407/Dth effective September 1, 2024⁴

Line No.	Description	Jan 2024 - Aug 2024	Sep 2024 - Dec 2024	2025
1	Beginning Balance (\$)	\$415,344	\$480,774	\$350,414
2	ECO Expenditures (\$)	\$319,196	\$184,454	\$503,650
3	ECO-Applicable Sales (Dth)	1,067,141	653,129	1,771,877
4	Base Rate (CCRC) (\$/Dth)	\$0.0413	\$0.0413	\$0.0413
5	Base Rate Recoveries (\$) [Line 3 * Line 4 * -1]	(\$44,073)	(\$26,974)	(\$73,179)
6	CCRA (\$/Dth)	\$0.1965	\$0.4407	\$0.4407
7	CCRA Recoveries (\$) [Line 3 * Line 6 * -1]	(\$209,693)	(\$287,840)	(\$780,866)
8	Ending Balance (\$) [Line 1 + Line 2 + Line 5 + Line 7]	\$480,774	\$350,414	\$19

In the Department's comments from GMG's most recent CCRA proceeding, in docket G022/M-21-306, the Department suggested that GMG may wish to implement its proposed CCRA sooner than the beginning of the next calendar year.⁵ GMG's proposal in the current docket is in line with the Department's suggestion, in that the Company requested approval for its new CCRA effective on the first day of the month following approval. The Department continues to support this approach.

The Company stated its intent to file an updated tracker with actual expenditures for 2024 due to the potential for the actual tracker balance to vary from projections.⁶ The Department supports this

³ *Petition* at 2.

⁴ GMG used actual values for January – May 2024 and projected values thereafter.

⁵ See the Department's July 1, 2021 comments in docket G022/M-21-306 at 3.

⁶ *Petition* at 3.

approach and suggests that on an annual basis GMG file its ECO tracker account and request adjustment of its CCRA, if appropriate, to avoid large account balances and resulting large adjustments to the CCRA.

The Department reviewed GMG's proposed CCRA and its projections for the ECO tracker through 2025 based on its proposed CCRA. The Department concludes that GMG's calculations are correct and the proposed CCRA is reasonable. The Department recommends the Commission approve GMG's proposed CCRA of \$0.4407/Dth.

The Department requests that in future years, the Company also provide its two years of projected trackers in an Excel spreadsheet with all formula intact.

D. GMG'S HISTORICAL PERFORMANCE

The Department provides below a historical comparison of GMG's ECO activities from 2010 through the Company's proposed 2023 figures. This table shows how the Company's ECO expenditures, year-end tracker balances, and first year energy savings have changed over time. Unlike other utilities, GMG has not implemented a Demand Side Management (DSM) Shared Savings Incentive or ECO tracker carrying charges.

Department Table 3: GMG Summary ECO Statistics, 2010-2023

Year	Dept ECO Review Docket No.	PUC ECO Tracker and CCRA Review Docket No.	ECO Expenses (Approved by Department Deputy Commissioner)	ECO Tracker Year End Balance (Approved by Commission)	First Year Energy Savings (Approved by Department Deputy Commissioner)	First Year Savings as Percentage of Retail Sales (Approved by Department Deputy Commissioner)
2010	09-968.01	n/a	\$20,323	n/a	1,711	0.43%
2011	09-968.02	n/a	\$16,835	n/a	1,568	0.39%
2012	09-968	n/a	\$31,068	n/a	1,926	0.48%
2013	12-690.01	n/a	\$86,088	n/a	4,155	0.90%
2014	12-690.02	n/a	\$100,725	n/a	5,157	1.14%
2015	12-690.03	16-494	\$109,114	\$178,160	6,810	1.51%
2016	12-690.04	16-494	\$116,816	\$270,706	9,426	2.09%
2017	16-118.01	19-633	\$137,267	\$106,292	5,398	0.48%
2018	16-118.02	19-633	\$204,213	-\$89,196	12,137	1.18%
2019	16-118.03	20-458	\$245,781	-\$247,725	12,809	1.25%
2020	16-118.04	21-306	\$287,639	-\$15,200	10,563	1.03%
2021	20-474	24-45	\$389,912	\$306,094	14,460	0.84%
2022	20-474	24-45	\$551,085	\$464,864	17,469	1.01%
2023 (proposed)	20-474	24-45	\$401,205	\$415,344	12,498	0.72%

The Department notes that GMG's ECO spending and savings have increased significantly during this time period. The Department notes:

- From 2010 to 2023, GMG's savings increased 630 percent and spending increased 1,874 percent;
- From the 2010-2012 three-year time period to the 2021-2023 three-year time period, average savings increased 754 percent (from 1,735 Dth in 2010-2012 to 14,809 Dth in 2021-2023) and average spending increased 1,867 percent (from \$22,742 in 2010-2012 to \$447,401 in 2021-2023);
- GMG did not meet its 1.00 percent savings as a percentage of ECO-applicable retail sales goal in 7 years between 2010 and 2023.

These figures are shown in the following table:

Department Table 4: Savings and Spending Growth for GMG, 2010-2023 Select Years

	Savings (Dth)	Spending
2010	1,711	\$20,323
2023	12,498	\$401,205
Percent Change	630%	1,874%
2010-2012	1,735	\$22,742
2021-2023	14,809	\$447,401
Percent Change	754%	1,867%

E. GMG'S PROPOSED BILL MESSAGE

GMG proposed to update the previously approved bill message language notifying customers of the increase in the CCRA. The Company intends to update the language for inclusion with bills in the month immediately following a Commission Order. GMG's proposed updated languages reads:

Effective _____, 2024, your bill will include an adjusted Conservation Cost Recovery Adjustment (CCRA). The Minnesota Public Utilities Commission approved the CCRA on _____, 2024. The CCRA is necessary and allowed by law to fund the state-mandated Energy Conservation and Optimization Program. The CCRA is \$0.04407 per therm, or \$0.4407 per dekatherm, of natural gas that you use. If you have questions, please contact us at 1-888-931-3411 or www.greatermngas.com. Thank you.

The Department recommends approval of the updated bill message language.

III. RECOMMENDATIONS

The Department reviewed GMG's *Petition* and concludes that it is generally reasonable. The Department requests that in future filings GMG provide ECO (formerly CIP) trackers as Excel spreadsheets, with all formulae intact, covering all months from the most recently approved tracker (in this case, year 2023).

The Department recommends that the Commission:

1. Approve GMG's 2021, 2022, and 2023 ECO tracker account, as summarized in Department Table 1 above, with a December 31, 2023 tracker balance of \$415,344;
2. Approve a Conservation Cost Recovery Adjustment of \$0.4407/Dth to be effective on the first day of the month following approval;
3. Approve GMG's proposed bill message; and
4. Require GMG to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

[illegible]

[illegible]

August 1, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G011/M-24-46

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

Minnesota Energy Resources Corporation's (MERC or the Company) request (*Petition*) for Approval of the 2023 Conservation Improvement Program/Energy Conservation and Optimization Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor

The *Petition* was filed on May 1, 2024, by:

Joylyn C. Hoffman Malueg
Project Specialist 3
Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve MERC's *Petition***. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ DR. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Division of Energy Resources

Docket No. G011/M-24-46

I. SUMMARY OF THE UTILITY'S PROPOSAL

On May 1, 2024, Minnesota Energy Resources Corporation (MERC or the Company) submitted to the Minnesota Public Utilities Commission (Commission) a filing entitled *In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of the 2023 Conservation Improvement Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor*. In its Petition, MERC requested that the Commission approve:

- A financial incentive of \$1,494,587 for 2023 CIP activities;
- A 2023 CIP tracker with a year-end balance of (\$3,070,173.82); and
- A proposed Conservation Cost Recovery Adjustment (CCRA) factor of \$0.01221 per therm, with an effective date of January 1, 2025.

II. COMMISSION'S 2023 ORDER

On September 5, 2023, the Commission issued its Order approving MERC's 2022 CIP filings,¹ with the following determinations:

1. Approved MERC's 2022 Conservation Improvement Program ("CIP") Tracker Account petition.
2. Approved a 2022 DSM financial incentive of \$1,246,952 to be included in the Company's tracker account no sooner than the issue date of the Commission's Order in the instant docket.
3. Approved MERC's 2022 CIP tracker account activities with a December 31, 2022, ending over-recovery balance of (\$3,312,712.70).
4. Approved the revised gas CCRA of \$0.00155 per therm for all of MERC's Minnesota customer classes, effective January 1, 2024, or the first billing cycle in the month following the Commission's Order, whichever was later.
5. Approved MERC's customer notification message that reads as follows: Effective January 1, 2024, the CCRA (conservation cost recovery adjustment) has been revised to \$0.00155 per therm. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses.

¹ See Commission's September 5, 2023, Order in Docket No. G011/M-23-183.

6. Required MERC to submit a compliance filing with tariff sheets including all necessary calculations within 10 days of the issue date of this Order.

On September 11, 2023, MERC submitted its compliance tariff sheets in response to Order Point 6.

III. DEPARTMENT ANALYSIS

The Department's analysis of MERC's *Petition* is provided below in the following sections:

- In Section III.A, a review of Minnesota's updated conservation statutes;
- In Section III.B, MERC's proposed 2023 shared savings DSM financial incentive;
- In Section III.C, MERC's proposed reconciliation for its 2023 CIP tracker account;
- In Section III.D, MERC's proposed change to its currently approved CCRA;
- In Section III.E, MERC's historical CIP achievements and incentives, 20011-2023.

A. MINNESOTA'S UPDATED CONSERVATION STATUTES

In 2021, the Minnesota Legislature passed the Energy Conservation and Optimization (ECO) Act. This act updated Minnesota's existing "CIP" statutes, which have since become known as the "ECO" statutes. Subsequently, the state's Conservation Improvement Program (CIP) was re-branded as the state's Energy Conservation and Optimization (ECO) program. As a result, MERC's triennial filing governing the 2021-2023 years was considered a "CIP" Triennial Filing (Docket No. G011/CIP-20-479) and MERC's most recent triennial filing covering years 2024-2026 was considered its first "ECO" triennial filing (Docket No. G011/CIP-23-98). The Department expects future MERC reports will also incorporate the "ECO" language change.

The ECO Statutes impacting Investor-Owned Utilities are as follows:

- Minnesota Statutes § 216B.2401 (Energy Savings and Optimization Policy Goal);
- Minnesota Statutes § 216B.2402 (Definitions);
- Minnesota Statutes § 216B.241 (Public Utilities; Energy Conservation and Optimization);
- Minnesota Statutes § 216B.2411 (Distributed Energy Resources); and
- Minnesota Statutes § 216B.2412 (Decoupling of Energy Sales from Revenues).

The Department has reviewed the ECO Statutes for any changes that potentially impact the Commission. As under the former CIP Statutes, the ECO Statutes grant jurisdiction to the Department for most of the state's conservation activities. However, the Commission continues to have jurisdiction over two specific conservation items relevant to these Comments: the financial incentive and the

recovery of ECO (formerly CIP) costs. The Department found no substantive changes to those sections concerning the Commission's authority that would impact this proceeding. However, the Department's review of the Company's Shared Savings Financial Incentive will be impacted in next year's filing, as that future review will incorporate the Commission's January 25, 2024 *Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan* from Docket No. E,G999/CI-08-133 (In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation).

Therefore, the Department has determined that its current review of MERC's *Petition* can proceed as it has in past years.

B. MERC'S PROPOSED FINANCIAL INCENTIVE FOR 2023 ECO ACHIEVEMENTS

1. Background and Summary of MERC's Proposed DSM Incentive

The Shared Savings Demand Side Management Financial Incentive Plan was initially approved by the Commission in Docket No. E,G999/CI-08-133 on January 27, 2010. On August 5, 2016, in the same docket, the Commission adopted an Order modifying the Demand Side Management Financial Incentive Plan for the years 2017-2019. In an Order issued November 15, 2021 in Docket No. 017/M-21-228, the Commission extended the modification through 2020. On December 9, 2020, the Commission approved the parameters for the Shared Savings financial incentive mechanism covering the 2021-2023 CIP triennial (December 9 Order). The Commission capped electric and gas incentives at 10 percent of net benefits and 30 percent of expenditures. The December 9 Order approved an expenditure cap of 35 percent if electric utilities meet or exceed energy savings of 2 percent and gas utilities of 1.2 percent of retail sales.

The instant filing covers CIP activities occurring in 2023, and so the 2023 financial incentive is subject to the following two caps: 10.0 percent of net benefits and up to 35 percent of expenditures.

2. The Department's Review of MERC's Proposed 2023 DSM Incentive

In the *Petition*, MERC provided the benefit and cost results associated with the Company's 2023 CIP performance. According to the Company, MERC achieved energy savings in 2023 of 397,439 dekatherms (Dth) resulting in an estimated \$19,242,041 of net benefits before the requested incentive.² This savings is equal to 0.90% of the Company's three-year weather-normalized sales. Based on the terms and conditions of its approved DSM incentive plan, MERC requested approval of a 2023 financial incentive of \$1,494,587.

MERC stated it excluded \$171,487 of Next Generation Energy Act assessments from the calculation of net benefits, consistent with the Commission's December 9, 2020 *Order*.³ In addition, MERC excluded costs and benefits associated with the Company's Low-Income Weatherization and 4U2 programs consistent with Minn. Statutes § 216B.241 as neither of these low-income programs pass the utility

² *Petition*, Attachment B, Page 4

³ *Petition*, Page 4

test.⁴ These programs were previously excluded from the calculation of costs and benefits in Docket No's G011/M-21-307, and G011/M-22-209 and approved by the Commission.⁵

The Department's technical analysis of the demand and energy savings that underpin MERC's proposed Shared Savings 2023 Demand Side Management financial incentive is ongoing and will not be completed before the instant comments are due. The existence of this lag between the Company's request for recovery of the incentive and the completion of the Department's review is a recurring phenomenon. In 2023, the Department compensated for this lag by simply assuming MERC's claimed energy savings for 2022 were correct as filed, with the intent to make, in the instant filing, any adjustments approved by the Deputy Commissioner of the Department. However, the Deputy Commissioner approved MERC's 2023 Status Report, covering 2022 CIP activity, without any adjustments in Docket No. G011/CIP-20-479, and thus none are required in this docket.⁶

On June 24, 2024, Department staff recommended that the Deputy Commissioner accept MERC's 2023 Status Report. If any adjustments should be required in the Deputy Commissioner's final decision, the Department will account for those in comments on the Company's 2024 filing.

The Department's review indicates that the Company correctly calculated its DSM financial incentive for 2023 CIP achievements and did not exceed either of the caps. Therefore, the Department recommends that the Commission approve MERC's 2023 Shared Savings financial incentive of \$1,494,587.

C. MERC'S PROPOSED 2023 CIP TRACKER ACCOUNT

In its *Petition*, MERC requested approval of its report on recoveries and expenditures included in the Company's CIP tracker account balance during 2023. Activity in MERC's CIP tracker account during 2023 can be found in Attachment A of the utility's *Petition* and is summarized below in Department Table 1.

Department Table 1: A Summary of MERC's 2023 CIP Tracker Account

Beginning Balance – January 1, 2023	(\$3,312,712.70)
Total CIP Expenses – January 1, 2023 – December 31, 2023 ⁷	\$11,820,715.82
Carrying Charges – January 1, 2023 – December 31, 2023	(\$187,870.46)
DSM Financial Incentive	\$1,246,952.00
CIP Recoveries – January 1, 2023 – December 31, 2023	(\$12,637,258.47)
Ending Balance – December 31, 2023	(\$3,070,173.82)

⁴ *Petition*, Page 4 - 5

⁵ See Commission's *Orders*, Docket No. G011/M-21-307, Commissions *Orders* G011/M-22-209

⁶ Approved by the Department's Deputy Commissioner on August 7, 2023.

⁷ The Tracker Account Total CIP Expenditures of \$10,187,470.35 Includes Next Generation Assessments & Low-Income Weatherization and 4U2 Programs.

The Department reviewed Attachment A of the *Petition* and concludes that the Company correctly calculated its 2023 CIP Tracker account. Therefore, the Department recommends the Commission approve MERC's 2023 CIP tracker, resulting in a year-end balance of (\$3,070,173.82).

The Department requests that in future years, the Company provide the CIP tracker (in this case, for year 2023) in an excel spreadsheet with all formula intact.

D. MERC'S PROPOSED CHANGE TO ITS CURRENTLY APPROVED CCRA

1. CCRA Calculation

Minnesota law states, in relevant part, the Commission "may permit a public utility to file rate schedules for annual recovery of the cost of energy conservation improvements."⁸ This annual CIP recovery mechanism is generally referred to as the Conservation Cost Recovery Adjustment or CCRA.

In MERC's *Petition*, the Company proposes to change the CCRA factor from the current \$0.00155 per therm to \$0.01221 per therm on January 1, 2025.⁹ The current CCRA factor was approved by the Commission on September 5, 2023, and implemented on January 1, 2024.¹⁰

According to the *Petition*, MERC anticipates an under-recovery of \$5,225,155 as of the end of December 2025.¹¹ The modification to the CCRA factor will allow the Company to recover the under-collected forecasted balance throughout 2025.

Table 2 below shows the Company's calculation of the proposed CCRA.

Table 2: Calculation of MERC's Proposed CCRA¹²

Description	Amount
Forecasted beginning balance (January 1, 2025)	(\$519,021)
Proposed expenditures (January 2025-December 2025)	\$15,394,988
Proposed 2023 incentive (to be approved in 2024)	\$1,494,587
Forecasted 2024 incentive (based on current approved 2023)	\$1,216,044
Less forecasted CCRC recovery (January 2025-December 2025)	(\$12,366,379)
Projected carrying charges for 2025	(\$4,937)
Forecasted December 2025 balance	\$5,225,155
Forecasted gas sales (January 2025-December 2025) in Therms	428,050,511
CCRA=\$/therm beginning January 1, 2025	\$0.01221

⁸ See Minn. Stat. § 216B.16, subd.6b paragraph (c).

⁹ *Petition*, Page 6

¹⁰ <https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={40E3F482-0000-CF13-95D2-6BA9732B5BEB}&documentTitle=20228-188715-01>

¹¹ *Petition*, Page 7

¹² *Petition*, Attachment C

The Department reviewed the calculation of MERC's proposed CCRA rate of \$0.01221 per therm for 2025 and concludes it is accurate. To provide additional information for the Commission, the Department requests MERC provide in its Reply Comments an estimate of the average residential customer bill impact, and a new forecasted December 2025 ending balance incorporating the new CCRA rate.

The Department recommends the Commission approve a CCRA rate of \$0.01221 per therm for all of MERC's customer classes, effective January 1, 2025.

E. HISTORY OF MERC'S ECO (FORMERLY CIP) ACHIEVEMENTS AND FINANCIAL INCENTIVES 2011-2023

In Attachment A, the Department presents a historical comparison of MERC's CIP and DSM activities during the period of 2011 through 2023. This table provides an indication of how the Company's achieved energy savings, CIP expenditures, Shared Savings financial incentive, carrying charges, and year-end tracker balance changed over time. Select statistics from Attachment A are presented in Table 3:

Department Table 3: Savings, Expenditures, and Incentives for Select Years, 2011-2023

	Achieved Energy Savings (DTH)	CIP Expenditures	DSM Financial Incentive
2023	397,439	\$11,820,716	\$1,494,587
2022	410,281	\$8,947,104	\$1,246,952
2011	457,747	\$7,870,823	\$2,587,948
Average 2021-2023	400,181	\$10,123,182	1,330,824
Average 2011-2013	472,390	\$8,817,375	\$2,603,403
Compare 2023 to 2022	-3.13%	32.12%	19.86%
Compare 2023 to 2011	-13.15%	50.18%	-42.25%
Compare 2023 to Avg 2021-2023	-0.69%	16.77%	12.31%
Compare Avg 2021-2023 to Avg 2011-2013	-15.29%	14.81%	-48.88%

Department Table 3 shows that in 2023:

- 2023 MERC's achieved energy savings were 3.13% lower than the Company's 2022 achieved energy savings;
- MERC's 2023 CIP expenditures increased by 32.12% and the DSM financial incentive increased by 19.86%;
- Comparing 2023 to a three-year 2021-2023 average; MERC's achieved energy savings decreased 0.69%, CIP expenditures increased 16.77% and the Company's Shared Savings DSM financial incentive increased 12.31%;

- Comparing 2023 to 2011 MERC decreased its achieved energy savings by 13.15%, expenditures have increased by 50.18% and the Shared Savings DSM financial incentive has decreased 42.25%.

III. RECOMMENDATIONS

The Department concludes MERC's filing is generally reasonable.

The Department recommends the Commission take the following action:

1. Approve a 2023 DSM financial incentive of \$1,494,587 to be included in the Company's tracker account no sooner than the issue date of the Commission's Order in the instant docket;
2. Approve MERC's 2023 CIP tracker account activities as summarized in Table 1 above with a December 31, 2023, ending over-recovery balance of (\$3,070,173.82);
3. Approve the revised gas CCRA of \$0.01221 per therm for all of MERC's Minnesota customer classes, effective January 1, 2025, or the first billing cycle in the month following the Commission's Order, in this matter, whichever is later;
4. Approve MERC's customer notification message that reads as follows; and

Effective January 1, 2025, the CCRA (conservation cost recovery adjustment) has been revised to \$0.01221 per therm. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses.

5. Require MERC to submit a compliance filing with tariff sheets including all necessary calculations within 10 days of the issue date of this Order.

Attachment A, Table 1. MERC's Natural Gas Historical CIP Achievements, Incentives, and Tracker Balance 2007-2023

MERC's Historical CIP Achievements, DSM Financial Incentives, and Tracker Balance 2011 - 2022													
Line No.	1	2	3	4	5	6	7	8	9	10	11	12	13
Year	Achieved Energy Savings (Dth)	CIP Expenditures	DSM Financial Incentive	Incentive + CIP Expenditures	Net Benefits	Carrying Charges	Year-End Tracker Balance	Average Cost per first year Dth Saved	Average cost per Dth Saved (including Incentives)	Incentive as a % of CIP Expenditures	Incentive as a % of Net Benefits	Carrying Charges as a % of Expenditures	Year-End Tracker Balance as a % of Expenditures
2011	457,747	\$7,870,823	\$2,587,948	\$10,458,771	\$34,530,422	\$592,929	\$10,086,519	\$17.19	\$22.85	32.88%	7.49%	7.53%	128.15%
2012	534,596	\$9,951,018	\$2,729,531	\$12,680,549	\$34,567,212	\$496,537	\$11,633,350	\$18.61	\$23.72	27.43%	7.90%	4.99%	116.91%
2013	424,827	\$8,630,283	\$2,492,730	\$11,123,013	\$17,668,017	\$424,887	\$14,781,047	\$20.31	\$26.18	28.88%	14.11%	4.92%	171.27%
2014	369,068	\$7,360,832	\$2,093,158	\$9,453,990	\$15,081,932	(\$154,344)	\$115,423	\$19.94	\$25.62	28.44%	13.88%	-2.10%	1.57%
2015	493,382	\$8,870,639	\$3,392,001	\$12,262,640	\$26,416,176	(\$51,228)	\$1,269,151	\$17.98	\$24.85	38.24%	12.84%	-0.58%	14.31%
2016	472,000	\$9,198,728	\$3,245,000	\$12,443,728	\$25,948,259	(\$45,726)	(\$158,238)	\$19.49	\$26.36	35.28%	12.51%	-0.50%	-1.72%
2017	402,989	\$10,666,999	\$1,694,489	\$12,361,488	\$16,561,396	(\$56,497)	(\$601,531)	\$26.47	\$30.67	15.89%	10.23%	-0.53%	-5.64%
2018	509,758	\$11,777,435	\$1,892,566	\$13,670,001	\$18,463,890	(\$221,377)	(\$4,540,350)	\$23.10	\$26.82	16.07%	10.25%	-1.88%	-38.55%
2019	468,544	\$12,115,461	\$1,771,381	\$13,886,842	\$23,113,258	(\$221,699)	(\$4,267,774)	\$25.86	\$29.64	14.62%	7.66%	-1.83%	-35.23%
2020	367,324	\$9,072,339	\$1,345,674	\$10,418,013	\$17,827,298	(\$143,149)	(\$971,704)	\$24.70	\$28.36	14.83%	7.55%	-1.58%	-10.71%
2021	392,822	\$9,601,727	\$1,250,934	\$10,852,661	\$16,269,824	(\$86,499)	(\$788,054)	\$24.44	\$27.63	13.03%	7.69%	-0.90%	-8.21%
2022	410,281	\$8,947,104	\$1,246,952	\$10,194,056	\$15,614,303	(\$140,603)	(\$3,312,713)	\$21.81	\$24.85	13.94%	7.99%	-1.57%	-37.0%
2023	397,439	\$11,820,716	\$1,494,587	\$13,315,303	\$19,242,041	(\$187,870)	(\$3,070,174)	\$29.74	\$33.50	12.64%	7.77%	-1.59%	-26.0%

August 1, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G002/M-24-47

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

A Petition submitted by Northern States Power Company, doing business as Xcel Energy (Xcel, Xcel Energy, or the Company), requesting approval of the following:

- The Conservation Cost Recovery contained in Xcel's 2023 Conservation Improvement Program (CIP) natural gas tracker account;
- A proposed 2023 natural gas DSM financial incentive of \$4,253,188; and
- A proposed 2024/2025 natural gas CIP Adjustment Factor (CAF) of \$0.022918 per therm.

Xcel Gas filed the Petition on April 1, 2024.

The Department recommends the Commission **approve** Xcel's Petition. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

HJ/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G002/M-24-47

I. INTRODUCTION

On April 1, 2024, Northern States Power Company d/b/a Xcel Energy submitted to the Minnesota Public Utilities Commission (Commission) a Petition of Northern States Power Company for Approval of a natural gas Conservation Improvement Program Adjustment Factor (Petition). The Petition includes a report of proposed recoveries and expenditures in Xcel's natural gas Conservation Improvement Program (CIP) tracker account during 2023, a proposed increase in the currently approved natural gas CIP Adjustment Factor (CAF), and a proposed Shared Savings Demand Side Management (DSM) financial incentive for its 2023 conservation achievements. Xcel's Petition requested the Commission approve the following:

- The Conservation Cost Recovery contained in Xcel's 2023 Conservation Improvement Program (CIP) natural gas tracker account with a 2023 ending balance of (\$5,587,806);
- A proposed 2023 natural gas DSM financial incentive of \$4,253,188; and
- A proposed 2024/2025 natural gas CIP Adjustment Factor (CAF) of \$0.022918 per therm.

The Petition contains data relevant to the Company's electric utility as well as to its natural gas utility. The Department will not comment on information related to the electric utility in this docket; instead see Docket No. E002/M-24-50.

II. COMMISSION'S 2023 ORDER

On September 5, 2023, the Commission issued its Order in Docket No. G002/M-23-146 approving Xcel's 2022 natural gas DSM financial incentive, CAF, and CIP tracker. In that Order the Commission:

1. Approved Xcel Energy's natural gas Conservation Improvement Factor petition.
2. Approved Xcel Energy's natural gas Shared Saving DSM financial incentive of \$3,578,029.
3. Approved Xcel Energy's natural gas 2022 Tracker account as filed with an ending balance of (\$3,614,603).
4. Approved a 2023/2024 natural gas CIP Adjustment Factor of \$0.032534 per therm beginning October 1, 2023, or the first billing cycle in the month following the Commission's Order in this matter, whichever is later.
5. Approved Xcel's bill message, effective the first month the 2023/2024 natural gas CIP Adjustment Factor takes effect, revised as necessary to incorporate the approved CAF and effective date: Effective Oct. 1, 2023, the Resource Adjustment line item on your bill has increased due to a change in the Conservation Improvement Program (CIP) factor. The natural gas CIP portion of the Resource Adjustment is \$0.032534 per therm.

6. Required Xcel Energy to submit a compliance filing with tariff sheets including all necessary calculations within 10 days of the issue date of the Order.

On September 14, 2023, Xcel Energy filed a compliance filing recalculating the CAF by using actual data through August 2023 and updating the CAF to \$0.008994 per therm to be implemented October 1, 2023. No party opposed this revised CAF rate. The Department recommended that the Commission accept compliance filing as filed on September 28, 2023.

III. DEPARTMENT ANALYSIS

The Department's analysis of Xcel's *Petition* is provided below in the following sections:

- Section III.A, Review of Minnesota's updated conservation statutes;
- Section III.B, Xcel's proposed natural gas 2023 Shared Savings DSM financial incentive;
- Section III.C, Xcel's proposed natural gas 2023 CIP Tracker account;
- Section III.D, Xcel's proposed natural gas CIP Adjustment Factor for 2024/2025;
- Section III.E, Xcel's proposed natural gas Customer Bill Notice; and
- Section III.F, Review of Xcel's conservation activity for the period of 2010 through 2023.

A. UPDATE ON MINNESOTA'S CONSERVATION STATUTES AND PROGRAMS

In 2021, the Minnesota Legislature passed the Energy Conservation and Optimization Act. This act updated Minnesota's existing "CIP" Statutes, which have since become known as the "ECO" statutes. Subsequently, the state's Conservation Improvement Program (CIP) was re-branded as the state's Energy Conservation and Optimization (ECO) program. As a result, Xcel's triennial filing governing the 2021-2023 years was considered a "CIP" Triennial Filing, Xcel's most recent triennial filing covering years 2024-2026 was considered its first "ECO" Triennial Filing. The Department expects future Xcel Status Reports will also incorporate the "ECO" language change.

The ECO Statutes impacting Investor-Owned Utilities are as follows:

- Minnesota Statutes 216B.2401 (Energy Savings and Optimization Policy Goal);
- Minnesota Statutes 216B.2402 (Definitions);
- Minnesota Statutes 216B.241 (Public Utilities; Energy Conservation and Optimization);
- Minnesota Statutes 216B.2411 (Distributed Energy Resources); and
- Minnesota Statutes 216B.2412 (Decoupling of Energy Sales from Revenues).

The Department's review of the Company's Shared Savings Financial Incentive will be impacted in next year's filing, as that future review will incorporate the Commission's January 25, 2024 Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan from Docket No. E,G999-CI-08-133 (In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation).

B. XCEL'S PROPOSED NATURAL GAS DSM FINANCIAL INCENTIVE FOR 2023 CIP ACHIEVEMENTS

1. Background of the DSM Financial Incentive

The Shared Savings DSM financial incentive plan (DSM) was initially approved by the Commission in Docket No. E,G999/CI-08-133 on January 27, 2010. On August 5, 2016, in the same docket, the Commission adopted an Order modifying the Demand Side Management Financial Incentive Plan for the years 2017-2019 and in an Order issued February 20, 2020 the Commission extended the modification through 2020. On December 9, 2020, the Commission approved the parameters for the Shared Savings Financial Incentive Mechanism covering the 2021-2023 CIP triennial (December 9th Order).¹ In that Order, the Commission capped electric and gas incentives at 10 percent of net benefits and 30 percent of expenditures. The December 9th Order also allowed for the expenditure cap to exceed the 30 percent cap up to a maximum of 35 percent, if a gas utility meets or exceeds energy savings equaling 1.2 percent of retail sales. For more details about the December 9th Order, see Department Attachment A.

The current filing covers CIP activities occurring in 2023, and therefore is subject to the following two caps: 10 percent of net benefits and up to 35 percent of expenditures.

2. Xcel's Proposed Natural Gas Shared Savings DSM Incentive

Xcel reported 2023 achieved energy savings of 1,007,922 dekatherms (Dth), expenditures of \$19,783,475, and net benefits achieved of \$42,531,877.² These energy-savings equate to 95 percent of the Company's 2023 savings goal³ and 1.32 percent of its three-year average weather-normalized CIP-applicable retail sales.⁴ Based on the terms and conditions of its approved DSM incentive plan, Xcel requested a natural gas DSM financial incentive of \$4,253,188 for 2023 achievements, equal to 10 percent of the Company's calculated 2023 net benefits and 35 percent of the Company's 2023 expenditures.⁵

In most years, a lag exists between the engineering-oriented analysis of the demand and energy savings that underpin the proposed incentive. In last year's review, the Department compensated for this review by simply assuming Xcel's 2022 energy-savings were correct as filed, with the intent to

¹ December 9, 2020 [Order](#) in Docket No. E,G999/CI-08-133.

² Petition, Attachment A, Pages 20-21.

³ Petition, Page 4.

⁴ Petition, Attachment A, Pages 21-22; $1,007,922/76,465,184 = 0.0131814500047499 = 1.32\%$

⁵ Petition, Attachment A, Pages 20-22.

make, in the instant filing, any adjustments approved by the Deputy Commissioner of the Department. The Deputy Commissioner approved Xcel's 2022 Status Report without adjustments in Docket No. G002/CIP-20-473.⁶

On May 23, 2024, the Department's ECO staff recommended the Deputy Commissioner approve Xcel's 2023 Status Report.⁷ If any adjustments should be required in the Deputy Commissioner's final decision, the Department will account for those in the Company's 2024 filing.

The Department's review indicates Xcel correctly calculated its 2023 DSM financial incentive and did not violate either of the Commission-approved caps. Therefore, the Department recommends the Commission approve Xcel's proposed 2023 natural gas DSM financial incentive of \$4,253,188.

C. XCEL'S PROPOSED NATURAL GAS 2023 CIP TRACKER ACCOUNT

Xcel requested Commission approval of its 2023 natural gas CIP tracker activity, resulting in a year-end 2023 balance of (\$5,587,806). Table 1 below shows a summary of activity in Xcel's 2023 natural gas CIP tracker account.

Table 1: A Summary of Xcel's Natural Gas 2023 Tracker Account⁸

Description	Time Period	Amount
Beginning Balance	December 31, 2022	(\$3,598,320)
CIP Expenses	January 1 through December 31, 2023	\$19,783,475 ⁹
Other Adjustments	December 2023	(\$1,054)
Performance Incentives	Incentives Recorded in 2023 for 2022	\$3,578,029
Carrying Charges	January 1 through December 31, 2023	(\$51,330)
Recovered in Base Rates	January 1 through December 31, 2023	(\$8,926,769)
Recovered in CIP Adjustment Factor	January 1 through December 31, 2023	(\$16,371,837)
Ending Balance	December 31, 2023	(\$5,587,806)

The Department reviewed the Company's natural gas CIP tracker account activity, as provided in the Company's Petition, and found no calculation errors. The Department also reviewed the Company's reasons behind the Other Adjustments line-item totaling (\$1,054), which was a reclassification from natural gas moved over to electric, and found these to be reasonable.

The Department noted a difference in the approved ending balance for 2022 and the beginning balance in 2023. The approved 12/31/22 end balance of the CIP tracker in Docket No. G002/M-23-146

⁶ Approved by the Department's Deputy Commissioner on [July 6, 2023](#).

⁷ Docket No. E, G002/CIP-20-473, [May 23, 2024](#).

⁸ Petition, Attachment A, Page 9.

⁹ Note that this figure does not match the reported 2023 CIP spend of \$19,782,422 because it shows pre-adjustment spending; the adjustments of (\$1,054) are reported as the next line item in the table.

was (\$3,614,603),¹⁰ but in this filing, the beginning balance on 1/1/23 was (\$3,598,320). The dollar amount difference is \$16,283 for which the Company provided the following explanation in response to Information Request 1:

The Company's Compliance tracker filed on September 14, 2023 reflects the (\$3,598,320) which varies from the initial filing on April 1, 2023 (\$3,614,603) due to an update to the Company's carrying charge. The carrying change was approved in the Company's Multi Year Gas Rate Case (G002/MR-21-678) on April 13, 2023. The adjustment of \$16,283 in the CIP Tracker was approved by the Department of Commerce on September 28, 2023, in Docket No. G002/M-23-146.¹¹

The Department recommends the Commission approve Xcel's natural gas 2023 tracker account with an ending balance of (\$5,587,806) as shown in Table 1.

D. XCEL'S PROPOSED NATURAL GAS CIP ADJUSTMENT FACTOR FOR 2024/2025

Minnesota law states, in relevant part, the Commission "may permit a public utility to file rate schedules providing for annual recovery of the cost of energy conservation improvements."¹² Xcel refers to its approved annual gas CIP recovery mechanism as the CIP Adjustment Factor (CAF). As noted above, in its September 5, 2023 Order in Docket No. G002/M-23-146, the Commission approved a 2023/2024 (CAF) of \$0.032534 per therm for Xcel. The CAF was eventually adjusted to \$0.008994 per therm through the Company's September 14, 2023 compliance filing, and the Department recommended the Commission approve in its September 28, 2023 comments in Docket No. G002/M-23-146.

Table 2 below shows Xcel currently projects an October 1, 2025 unrecovered CIP Tracker balance of \$17,759,101 under the assumption of no additional CIP cost recovery through the CAF. This projection also assumes Xcel's conservation expenditures for the 2024/2025 time period remains close to the forecasted dollar amount.

Table 2: Xcel's Natural Gas Forecasted End of September 2025 CIP Tracker Account¹³

Forecasted beginning balance (Oct 2024)	(\$175,899)
Program Budget (Oct 2024 - Sept 2025)	\$32,217,115
Forecasted 2024 incentive	\$4,236,255
Less forecasted CCRC recovery (Oct 2024 - Sept 2025)	\$18,518,370
Forecasted October 2025 beginning of month balance	\$17,759,101

¹⁰ September 5, 2023 [Order](#) in Docket No. G002/M-23-146, Ordering Point 3.

¹¹ See Department Attachment; Xcel's Response to Information Request 1.

¹² See Minn. Statutes § [216B.16](#), subd. 6b(c).

¹³ Petition, Attachment A, Page 14.

Xcel included the above calculations so the Company can calculate the CAF modification needed to align recovery of costs most closely to when costs are incurred and to minimize the under- or over-recovery of CIP costs. This both minimizes carrying charges and helps ensure the customers causing the costs pay for the costs.

The Department reviewed the forecasted natural gas CIP Tracker Account and found no calculation errors.

In its Petition, Xcel proposed a gas CAF of \$0.022918 per dekatherm for each customer class, effective with the first billing cycle of October 2024 through September 2025 billing period.¹⁴ Xcel's proposed CIP Adjustment Factor is an increase of \$0.013924 per therm, or 155 percent higher than the currently approved CAF of \$0.008994 per therm. Xcel calculated the proposed 2024/2025 factor to allow the Company to recover both CIP costs it does not recover through the Conservation Cost Recovery Charge (or "CCRC," which is represented in base rates) and its approved financial incentives. The proposed CAF would minimize Xcel's projected tracker balance as outlined in Xcel's calculation of the proposed natural gas CIP Adjustment Factor in Table 3 below:

Table 3: Xcel's Calculation of Its Revised Natural Gas CIP Adjustment Factor¹⁵

Forecasted beginning balance (October 2024)	\$(175,899)
Program Budget (October 2024 - September 2025)	\$32,217,115
Forecasted 2024 Incentive	\$4,236,255
Less forecasted CCRC recovery (October 2024 - September 2025)	\$18,518,370
Forecasted October 2025 Beginning Balance without CAF	\$17,759,101
October 1, 2024 - September 30, 2025 ¹⁶ Sales (Dth)	77,330,648
Recalculated Gas CIP Adjustment Rate without Carrying Charges per Dth	\$0.22965/Dth
Recalculated Gas CIP Adjustment Rate without Carrying Charges per therm	\$0.022965/therm
Xcel's Proposed CIP Adjustment Factor with Carrying Charges per therm	\$0.022918/therm

Xcel's proposed CIP Adjustment Factor is an increase of \$0.013924 per therm, or 155 percent higher than the currently approved CAF of \$0.008994 per therm. Xcel adjusted the calculated rate to incorporate the effect of carrying charges, which were not included in the forecasted balance. To get the September 2025 forecasted CIP Tracker balance as close to zero without going negative (\$401 projected balance) the Company adjusted the calculated CIP Adjustment Rate to \$0.022918 per therm.

¹⁴ Petition, Attachment A, Pages 13-14.

¹⁵ Petition, Attachment A, Pages 14-15.

¹⁶ The Department notes petition says, "October 2023 through September 2024" but the correct dates were assumed. Petition, Attachment A, Page 15.

Table 4 compares the Company's current and proposed CIP Adjustment Factors.

Table 4: Xcel's Current versus Proposed CIP Adjustment Factor

Current Factor (\$/Therm)	Proposed Factor (\$/Therm)	Change (\$/Therm)	Percent Change¹⁷
\$0.008994/therm	\$0.022918/therm	\$0.013924/therm	155%

It is the goal of the Department to bring the tracker balance as close to zero as possible over the year, or alternatively over the course of the time the rate is proposed to be in place. This recommendation is because maintaining higher tracker balances (either positive or negative) is associated with a larger mismatch between the time the expenses are incurred and the time they are recovered. It is ultimately the Department's goal to ensure those customers that are benefiting from conservation services are the customers paying for them.

The Department notes the proposed CAF is higher than Xcel's current CIP Adjustment factor, but the Company projects to get the tracker balance as close to zero as possible by the end of the billing period with a projected end of month tracker balance of \$401 in September 2025. To determine the reasonableness of this scenario, we reviewed the CAF and potential alternatives using Xcel's input data. The Department found Xcel's proposed factor to be accurate using the current forecasted data. Therefore, the Department concludes Xcel's proposed CIP cost recovery is responsive to the public policy goal of Xcel minimizing carrying charges and recovering costs close to when incurred. The Department recommends the Commission approve Xcel's proposed CIP Adjustment Factor of \$0.022918 per therm.

E. XCEL'S PROPOSED CUSTOMER BILL NOTICE

With respect to rate change notification, Xcel proposed to notify customers by implementing the following message on customer bills, effective the first month the 2024/2025 CIP Adjustment Factor takes effect:

Effective Oct. 1, 2024, the Resource Adjustment line item on your bill has increased due to a change in the Conservation Improvement Program (CIP) factor. The natural gas CIP portion of the Resource Adjustment is \$0.022918 per therm.

The Department recommends the Commission approve Xcel's proposed natural gas customer bill notice.

¹⁷ $(.022918-.008994)/.022918 = 1.548143206582166*100 = 154.8143206582\%$.

F. A REVIEW OF XCEL'S NATURAL GAS CIP ACTIVITY.

In Attachment B, the Department presents a historical comparison of Xcel's natural gas CIP activity for the period 2011 through 2023. The attachment provides an indication of how the Company's achieved savings energy, CIP expenditures, Shared Savings financial incentive, carrying charges, and year-end tracker balance changed during the period. Select statistics from Attachment B, Table 1 are presented in Table 5:

Table 5: Savings, Expenditures, and Incentives for Select Years, 2011-2023¹⁸

	Achieved Energy Savings (DTH)	CIP Expenditures	DSM Financial Incentive
2023	1,007,922	\$19,782,422	\$4,253,188
2022	920,504	\$19,857,191	\$3,578,029
2011	747,123	\$12,701,823	\$2,833,206
Average 2021-2023	1,032,885	\$19,446,531	\$4,283,788
Average 2011-2013	767,367	\$12,841,314	\$3,644,340
Compare 2023 to 2022	9.5%	-0.4%	18.9%
Compare 2023 to 2011	34.9%	55.7%	50.1%
Compare 2023 to Avg 2021-2023	-2.4%	1.7%	-0.7%
Compare Avg 2021-2023 to Avg 2011-2013	34.6%	51.4%	17.5%

Table 5 above shows:

- In 2023, achieved energy savings were 9.5 percent higher, CIP expenditures decreased by 0.4 percent and the DSM financial incentive increased by 18.9 percent from 2022;
- Comparing 2023 to 2011, Xcel has increased its achieved energy savings by 34.9 percent, expenditures have increased by 55.7 percent and the shared savings DSM financial incentive has increased by 50.1 percent;
- Comparing 2023 to a three-year 2021-2023 average, achieved energy savings are down 2.4 percent, CIP expenditures increased 1.7 percent and the shared savings DSM financial incentive is down 0.7 percent; and
- Comparing 2021-2023 average to 2011-2013 average, achieved energy savings are up 34.6 percent, CIP expenditures are up 51.4 percent and shared savings DSM financial incentive has increased by 17.5 percent.

IV. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

The Department concludes Xcel's natural gas Conservation Improvement Factor Petition is reasonable, therefore the Department recommends the Commission take the following action:

- 1) Approve Xcel Energy's natural gas Shared Savings DSM financial incentive of \$4,253,188;

¹⁸ Data taken from Department Attachment B.

- 2) *Approve a 2024/2025 natural gas CIP Adjustment Factor of \$0.022918 per therm beginning October 1, 2024, or the first billing cycle in the month following the Commission's Order in this matter, whichever is later;*
- 3) *Approve Xcel Energy's Natural Gas 2023 Tracker account as filed on April 1, 2024, with an ending balance of (\$5,587,506);*
- 4) *Approve Xcel's proposed bill message, effective the first month the 2024/2025 natural gas CIP Adjustment Factor takes effect, revised as necessary to incorporate the approved CAF and effective date; and*
- 5) *Require Xcel Energy to submit a compliance filing with tariff sheets including all necessary calculations within 10 days of the issue date of the Order.*

The December 9, 2020 Order (December 9, 2020)
Docket No. E,G999/CI-08-133

- A. For electric utilities, the 2021 -2023 triennium plan is as follows:
- 1) Authorize financial incentives for a utility that achieves energy savings of at least 1.0 percent of the utility's retail sales.
 - 2) For a utility that achieves energy savings equal to 1.0 percent of retail sales, award the utility a share of the net benefits as set forth in Attachment A.
 - 3) For each additional 0.1 percent of energy savings, the utility achieves, increase the net benefits awarded to the utility by an additional 0.75 percent until the utility achieves savings of 1.7 percent of retail sales.
 - 4) For savings levels of 1.7 percent and higher, award the utility a share of the net benefits equal to the Net Benefits Cap.
 - 5) Electric utilities may exceed the 30% CIP Expenditures Cap, up to a maximum of 35%, if they meet or exceed energy savings equaling 2% of retail sales.
- B. For Gas utilities, the 2021 -2023 triennium plan is as follows:
- 1) Authorize financial incentives for a utility that achieves energy savings of at least 0.7 percent of the utility's retail sales.
 - 2) For a utility that achieves energy savings equal to 0.7 percent of retail sales, award the utility a share of the net benefits as set forth in Attachment A.
 - 3) For each additional 0.1 percent of energy savings, the utility achieves, increase the net benefits awarded to the utility by an additional 0.75 percent until the utility achieves savings of 1.2 percent of retail sales.
 - 4) For savings levels of 1.2 percent and higher, award the utility a share of the net benefits equal to the Net Benefits Cap.
 - 5) Gas utilities may exceed the 30% CIP Expenditures Cap, up to a maximum of 35%, if they meet or exceed energy savings equaling 1.2% of retail sales.
- C. For all utilities, set the following Net Benefit Caps:
- 1) 13.5 percent in 2017,
 - 2) 12.0 percent in 2018,
 - 3) 10.0 percent in 2019, and
 - 4) 10.0 percent in 2020.
- D. For all utilities, set the following Conservation Improvement Plan (CIP) Expenditure Caps:
- 1) 40 percent in 2017,
 - 2) 35 percent in 2018,
 - 3) 30 percent in 2019, and
 - 4) 30 percent in 2020.

The Commission retains certain provisions from the current Shared Savings DSM Financial

Incentive Plan, with slight modifications, as follows:

- CIP-exempt customers shall not be allocated costs for the new shared savings incentive. Sales to CIP-exempt customers shall not be included in the calculation of utility energy savings goals.
- If a utility elects not to include a third-party CIP project, the utility cannot change its election until the beginning of subsequent years.
- If a utility elects to include a third-party project, the project's net benefits and savings will be included in the calculation of the energy savings and will count toward the 1.5 percent savings goal.
- The energy savings, cost, and benefits of modifications to non-third-party projects will be included in the calculation of a utility's DSM incentive.
- The costs of any mandated, non-third-party projects (e.g., the 2007 Next Generation Energy Act assessments,¹ University of Minnesota Initiative for Renewable Energy and the Environment costs²) shall be excluded from the calculation of net benefits and energy savings achieved and incentive awarded.
- Costs, energy savings, and energy production related to Electric Utility Infrastructure Costs,³ solar installation⁴ and biomethane purchases⁵ shall not be included in energy savings for DSM financial incentive purposes.
- The Commission requests that the Department continue a stakeholder process, under the current docket, to evaluate ways of improving the shared-savings mechanisms for potential adoption in the 2024–2026 triennium including, but not limited to, discussion of:
 - a. Incorporation of lifetime energy savings into the incentive mechanism,
 - b. Incorporation of an incentive for utilities that achieve permanent peak reductions through the shared-savings incentive mechanism,
 - c. Comparison of alternative mechanisms, along with the approved 2021-2023 CIP financial incentive mechanism, to each other and to how a similar-sized (in terms of cost) supply-side investment would be rewarded financially through the cost-of-service model, and
 - d. Energy efficiency opportunities to support increased load flexibility (the ability to persistently shape and shift load).

¹ See 2007 Laws, art. 2

² *Id.*, § 3, subd. 6.

³ Minn. Stat. § 216B.1636

⁴ Minn. Stat. § 216B.241, subd. 5a.

⁵ *Id.*, subd. 5b.

The new Shared Savings DSM Incentive Plan shall be in effect for 2021 - 2023.

Utilities may discontinue the annual February 1 compliance filing because a scale of net benefits will no longer be required since the Department's proposal sets percentages at certain savings thresholds and calibrates the mechanism to dollars per unit of energy.

Attachment B: Xcel Historical Gas CIP Achievements, Incentives, and Tracker Balance, 2007-2023														
Column ID		A	B	C	D	E	F	G	H	I	J	K	L	M
Year	Xcel Docket Number	Achieved Energy Savings (Dth)	CIP Expenditures	DSM Financial Incentive	Incentive + CIP Expenditures	Net Benefits	Carrying Charges	Year End Tracker Balance	Avg Cost per 1st Year Dth Saved H=B/A	Avg Cost per Dth Saved (incl incentives) I=D/A	Incentives as % of CIP Exp J=C/B	Incentive as % of Net Benefits K=C/E	Carrying Charges as a % of Exp L=F/B	Year-End Tracker Balance as % of Expenditures M=G/B
2007	07-1555	888,460	\$ 5,762,345	\$ 1,689,752	\$ 7,452,097	\$ 84,934,941			\$ 6.49	\$ 8.39	29.3%	1.99%		
2008	08-391	613,134	\$ 6,423,486	\$ 1,267,379	\$ 7,690,865	\$ 53,103,686			\$ 10.48	\$ 12.54	19.7%	2.39%		
2009	09-346	670,120	\$ 7,682,999	\$ 964,758	\$ 8,647,757	\$ 54,919,812			\$ 11.47	\$ 12.90	12.6%	1.76%		
2010	10-297	697,322	\$ 11,374,005	\$ 2,264,511	\$ 13,638,516	\$ 53,710,455			\$ 16.31	\$ 19.56	19.9%	4.22%		
2011	12-316	747,123	\$ 12,701,823	\$ 2,833,206	\$ 15,535,029	\$ 62,179,293	\$ (215,734)	\$ (7,631,972)	\$ 17.00	\$ 20.79	22.3%	4.56%	-1.70%	-60.1%
2012	13-248	767,061	\$ 13,041,285	\$ 2,682,879	\$ 15,724,164	\$ 69,395,588	\$ (411,428)	\$ (4,648,913)	\$ 17.00	\$ 20.50	20.6%	3.87%	-3.15%	-35.6%
2013	14-288	787,918	\$ 12,780,833	\$ 5,416,936	\$ 18,197,769	\$ 32,085,609	\$ (368,277)	\$ (4,680,426)	\$ 16.22	\$ 23.10	42.4%	16.88%	-2.88%	-36.6%
2014	15-321	849,698	\$ 12,968,939	\$ 5,781,193	\$ 18,750,132	\$ 35,995,257	\$ (692,481)	\$ (12,398,883)	\$ 15.26	\$ 22.07	44.6%	16.06%	-5.34%	-95.6%
2015	16-283	838,319	\$ 13,577,149	\$ 5,763,443	\$ 19,340,592	\$ 37,350,638	\$ (34,795)	\$ 488,314	\$ 16.20	\$ 23.07	42.4%	15.43%	-0.26%	3.6%
2016	17-258	908,472	\$ 13,805,805	\$ 6,245,743	\$ 20,051,548	\$ 42,565,945	\$ (11,880)	\$ 1,746,885	\$ 15.20	\$ 22.07	45.2%	14.67%	-0.09%	12.7%
2017	18-246	799,597	\$ 14,181,339	\$ 3,753,592	\$ 17,934,931	\$ 29,231,281	\$ (21,564)	\$ (920,889)	\$ 17.74	\$ 22.43	26.5%	12.84%	-0.15%	-6.5%
2018	19-259	913,240	\$ 15,132,566	\$ 4,391,216	\$ 19,523,782	\$ 36,593,467	\$ (60,944)	\$ (3,660,890)	\$ 16.57	\$ 21.38	29.0%	12.00%	-0.40%	-24.2%
2019	20-403	584,761	\$ 13,573,925	\$ 1,790,002	\$ 15,363,927	\$ 25,211,491	\$ (48,780)	\$ (3,730,035)	\$ 23.21	\$ 26.27	13.2%	7.10%	-0.36%	-27.5%
2020	21-227	868,599	\$ 14,587,983	\$ 4,268,369	\$ 18,856,352	\$ 46,802,220	\$ (61,030)	\$ (5,349,608)	\$ 16.79	\$ 21.71	29.3%	9.12%	-0.42%	-36.7%
2021	22-160	1,170,229	\$ 18,699,980	\$ 5,020,146	\$ 23,720,126	\$ 50,201,464	\$ (40,065)	\$ (347,477)	\$ 15.98	\$ 20.27	26.8%	10.00%	-0.21%	-1.9%
2022	23-146	920,504	\$ 19,857,191	\$ 3,578,029	\$ 23,435,220	\$ 35,780,290	\$ (52,792)	\$ (3,614,602)	\$ 21.57	\$ 25.46	18.0%	10.00%	-0.27%	-18.2%
2023	24-47	1,007,922	\$ 19,782,422	\$ 4,253,188	\$ 24,035,610	\$ 42,531,877	\$ (51,330)	\$ (5,587,806)	\$ 19.63	\$ 23.85	21.5%	10.00%	-0.26%	-28.2%

October 22, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Northern States Power Company d/b/a Xcel Energy's Letter Regarding Updating its
2024/2025 Natural Gas CIP Adjustment Factor**
Docket No. G002/M-24-47

Dear Mr. Seuffert:

On April 1, 2024 Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed its initial Petition for the 2024/2025 Natural Gas CIP Adjustment Factor. The Department recommended that the Commission approve the Company's request for approval on August 1, 2024.

On October 10, 2024, Xcel submitted a letter requesting to update the 2024/2025 Natural Gas CIP Adjustment Factor. The Company explained that due to being able to update forecasted numbers for most of 2024 in the initial filing, to actual numbers for January through September 2024 in the updated filing, allows for a more accurate prediction of the CIP adjustment factor for the tracker recovery balance and moves the September 2025¹ tracker balance as close to \$0 as possible. The updated filing includes three adjustments:

1. The 2024 Tracker has been updated with Actual Spend and CIP Adjustment Factor Recovery through September 2024.
2. The 2023 Performance Incentive accrual has been moved to November 2024.
3. The resulting CIP Tracker Rate has been updated beginning on December 1, 2024.

The Department reviewed Xcel's requested update to its 2024/2025 Natural Gas CIP Adjustment Factor. First, the Department notes that in the initial filing, the Company projected the September 2025 tracker recovery balance to be \$401. In the updated filing, using actual numbers through September 2024, the projected September 2025 tracker recovery balance is \$576. This number is slightly higher than initially projected, but not unreasonable and still relatively close to \$0 without going negative. Second, the Department agrees with the updates to actual CIP spending and actual CIP

¹ The Department notes this should be September 2025 as shown in Xcel's Attachment A.

recovery through September 2024, and we note the main difference was lower actual recovery than initially forecasted. Third, the Department agrees that since the performance incentive has not yet been approved, moving it from September 2024 in the forecast to November 2024 in the updated filing is appropriate. Fourth, based on the above changes, the Department reviewed Xcel's calculations as shown in its Attachment A, and agrees with the updated change in the CIP adjustment factor from \$0.008994 per therm to \$0.030554 per therm, which is an increase of \$0.02156 per therm.

The Company's updated proposed natural gas customer bill message is as follows:

Effective December 1, 2024, the Resource Adjustment line item on your bill has increased due to a change in the Conservation Improvement Program (CIP) factor. The electric CIP portion of the Resource Adjustment is \$0.030554 per therm.

The Department would like to note that the Company's proposed bill message should be corrected to state, "natural gas CIP", rather than "electric CIP" as proposed.

The Department does not object to the Company's updated CIP adjustment factor of \$0.030554 per therm, and recommends the Commission accept Xcel's updated filing and updated CIP adjustment factor.

Sincerely,

/s/ Peter Wyckoff, Ph.D.
Deputy Commissioner, Division of Energy Resources

HJ/ar

CERTIFICATE OF SERVICE

I, Robin Benson, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission ORDER

Docket Numbers: **G-008/M-24-43; G-004/M-24-44; G-022/M-24-45;
G-011/M-24-46; G-002/M-24-47**

Dated this **8th** day of **November, 2024**

/s/ Robin Benson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 52406-0351	Electronic Service	No	OFF_SL_24-43_M-24-43
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-43_M-24-43
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	OFF_SL_24-43_M-24-43
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_24-43_M-24-43
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_24-43_M-24-43
Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-43_M-24-43
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_24-43_M-24-43
Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_24-43_M-24-43
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 55447-5142	Electronic Service	No	OFF_SL_24-43_M-24-43
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	OFF_SL_24-43_M-24-43

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	OFF_SL_24-43_M-24-43
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	OFF_SL_24-43_M-24-43
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_24-43_M-24-43
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_24-43_M-24-43
Karolanne	Foley	Karolanne.foley@dairylandpower.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_24-43_M-24-43
Tyler	Glewwe	Tyler.Glewwe@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-43_M-24-43
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-43_M-24-43
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_24-43_M-24-43
Jeffrey	Haase	jhaase@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-43_M-24-43
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	OFF_SL_24-43_M-24-43

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_24-43_M-24-43
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_24-43_M-24-43
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_24-43_M-24-43
Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-43_M-24-43
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-43_M-24-43
Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas	N/A	Electronic Service	No	OFF_SL_24-43_M-24-43
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_24-43_M-24-43
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	OFF_SL_24-43_M-24-43
Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission	1902 6th Ave E Hibbing, MN 55746	Electronic Service	No	OFF_SL_24-43_M-24-43
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 53707-1007	Electronic Service	No	OFF_SL_24-43_M-24-43

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_24-43_M-24-43
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-43_M-24-43
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-43_M-24-43
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 52406-0351	Electronic Service	No	OFF_SL_24-43_M-24-43
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-43_M-24-43
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_24-43_M-24-43
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	OFF_SL_24-43_M-24-43
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_24-43_M-24-43
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_24-43_M-24-43
Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	OFF_SL_24-43_M-24-43

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401-1993	Electronic Service	No	OFF_SL_24-43_M-24-43
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-43_M-24-43
Rick	Sisk	RSisk@trccompanies.com	Lockheed Martin	1000 Clark Ave. St. Louis, MO 63102	Electronic Service	No	OFF_SL_24-43_M-24-43
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_24-43_M-24-43
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_24-43_M-24-43
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_24-43_M-24-43
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-43_M-24-43
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_24-43_M-24-43
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	OFF_SL_24-43_M-24-43
Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-43_M-24-43

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Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_24-43_M-24-43

[illegible]

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Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	OFF_SL_24-44_M-24-44
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	OFF_SL_24-44_M-24-44
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_24-44_M-24-44
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_24-44_M-24-44
Karolanne	Foley	Karolanne.foley@dairylandpower.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_24-44_M-24-44
Tyler	Glewwe	Tyler.Glewwe@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-44_M-24-44
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-44_M-24-44
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_24-44_M-24-44
Jeffrey	Haase	jhaase@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-44_M-24-44
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	OFF_SL_24-44_M-24-44

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Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_24-44_M-24-44
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_24-44_M-24-44
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Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-44_M-24-44
Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas	N/A	Electronic Service	No	OFF_SL_24-44_M-24-44
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_24-44_M-24-44
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	OFF_SL_24-44_M-24-44
Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission	1902 6th Ave E Hibbing, MN 55746	Electronic Service	No	OFF_SL_24-44_M-24-44
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 53707-1007	Electronic Service	No	OFF_SL_24-44_M-24-44

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Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-44_M-24-44
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-44_M-24-44
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 52406-0351	Electronic Service	No	OFF_SL_24-44_M-24-44
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-44_M-24-44
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_24-44_M-24-44
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	OFF_SL_24-44_M-24-44
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_24-44_M-24-44
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_24-44_M-24-44
Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	OFF_SL_24-44_M-24-44

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Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401-1993	Electronic Service	No	OFF_SL_24-44_M-24-44
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-44_M-24-44
Rick	Sisk	RSisk@trccompanies.com	Lockheed Martin	1000 Clark Ave. St. Louis, MO 63102	Electronic Service	No	OFF_SL_24-44_M-24-44
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_24-44_M-24-44
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_24-44_M-24-44
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_24-44_M-24-44
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-44_M-24-44
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_24-44_M-24-44
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	OFF_SL_24-44_M-24-44
Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-44_M-24-44

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_24-44_M-24-44

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_24-45_M-24-45
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 52406-0351	Electronic Service	No	OFF_SL_24-45_M-24-45
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-45_M-24-45
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	OFF_SL_24-45_M-24-45
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_24-45_M-24-45
Robin	Burke	rburke@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_24-45_M-24-45
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_24-45_M-24-45
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_24-45_M-24-45
Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-45_M-24-45
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_24-45_M-24-45

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_24-45_M-24-45
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 55447-5142	Electronic Service	No	OFF_SL_24-45_M-24-45
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	OFF_SL_24-45_M-24-45
Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	OFF_SL_24-45_M-24-45
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	OFF_SL_24-45_M-24-45
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_24-45_M-24-45
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_24-45_M-24-45
Karolanne	Foley	Karolanne.foley@dairylandpower.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_24-45_M-24-45
Tyler	Glewwe	Tyler.Glewwe@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-45_M-24-45
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-45_M-24-45

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_24-45_M-24-45
Jeffrey	Haase	jhaase@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-45_M-24-45
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	OFF_SL_24-45_M-24-45
Jared	Hendricks	jared.hendricks@owatonna utilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_24-45_M-24-45
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_24-45_M-24-45
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_24-45_M-24-45
Martin	Kapsch	martin.kapsch@centerpoint energy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-45_M-24-45
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-45_M-24-45
Kathryn	Knudson	kathryn.knudson@centerpo intenergy.com	CenterPoint Energy Minnesota Gas	N/A	Electronic Service	No	OFF_SL_24-45_M-24-45
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_24-45_M-24-45

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_24-45_M-24-45
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	OFF_SL_24-45_M-24-45
Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission	1902 6th Ave E Hibbing, MN 55746	Electronic Service	No	OFF_SL_24-45_M-24-45
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 53707-1007	Electronic Service	No	OFF_SL_24-45_M-24-45
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_24-45_M-24-45
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-45_M-24-45
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-45_M-24-45
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 52406-0351	Electronic Service	No	OFF_SL_24-45_M-24-45
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_24-45_M-24-45
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-45_M-24-45

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_24-45_M-24-45
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	OFF_SL_24-45_M-24-45
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_24-45_M-24-45
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_24-45_M-24-45
Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	OFF_SL_24-45_M-24-45
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401-1993	Electronic Service	No	OFF_SL_24-45_M-24-45
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-45_M-24-45
Rick	Sisk	RSisk@trccompanies.com	Lockheed Martin	1000 Clark Ave. St. Louis, MO 63102	Electronic Service	No	OFF_SL_24-45_M-24-45
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_24-45_M-24-45
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_24-45_M-24-45

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_24-45_M-24-45
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-45_M-24-45
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_24-45_M-24-45
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	OFF_SL_24-45_M-24-45
Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-45_M-24-45
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_24-45_M-24-45

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 52406-0351	Electronic Service	No	OFF_SL_24-46_M-24-46
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-46_M-24-46
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	OFF_SL_24-46_M-24-46
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_24-46_M-24-46
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_24-46_M-24-46
Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-46_M-24-46
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_24-46_M-24-46
Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_24-46_M-24-46
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 55447-5142	Electronic Service	No	OFF_SL_24-46_M-24-46
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	OFF_SL_24-46_M-24-46

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	OFF_SL_24-46_M-24-46
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	OFF_SL_24-46_M-24-46
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_24-46_M-24-46
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_24-46_M-24-46
Karolanne	Foley	Karolanne.foley@dairylandpower.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_24-46_M-24-46
Tyler	Glewwe	Tyler.Glewwe@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-46_M-24-46
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-46_M-24-46
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_24-46_M-24-46
Jeffrey	Haase	jhaase@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-46_M-24-46
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	OFF_SL_24-46_M-24-46

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_24-46_M-24-46
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_24-46_M-24-46
Joylyn C	Hoffman Malueg	Joylyn.hoffmanmalueg@weenergygroup.com	Minnesota Energy Resources	2685 145th St W Rosemount, MN 55068	Electronic Service	Yes	OFF_SL_24-46_M-24-46
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_24-46_M-24-46
Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-46_M-24-46
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-46_M-24-46
Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas	N/A	Electronic Service	No	OFF_SL_24-46_M-24-46
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_24-46_M-24-46
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	OFF_SL_24-46_M-24-46
Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission	1902 6th Ave E Hibbing, MN 55746	Electronic Service	No	OFF_SL_24-46_M-24-46

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scot	McClure	scotmccclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 53707-1007	Electronic Service	No	OFF_SL_24-46_M-24-46
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_24-46_M-24-46
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-46_M-24-46
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-46_M-24-46
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 52406-0351	Electronic Service	No	OFF_SL_24-46_M-24-46
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-46_M-24-46
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_24-46_M-24-46
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	OFF_SL_24-46_M-24-46
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_24-46_M-24-46
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_24-46_M-24-46

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	OFF_SL_24-46_M-24-46
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401-1993	Electronic Service	No	OFF_SL_24-46_M-24-46
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-46_M-24-46
Rick	Sisk	RSisk@trccompanies.com	Lockheed Martin	1000 Clark Ave. St. Louis, MO 63102	Electronic Service	No	OFF_SL_24-46_M-24-46
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_24-46_M-24-46
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_24-46_M-24-46
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_24-46_M-24-46
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_24-46_M-24-46
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-46_M-24-46
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_24-46_M-24-46

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	OFF_SL_24-46_M-24-46
Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-46_M-24-46
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_24-46_M-24-46

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Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 52406-0351	Electronic Service	No	OFF_SL_24-47_M-24-47
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-47_M-24-47
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	OFF_SL_24-47_M-24-47
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_24-47_M-24-47
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_24-47_M-24-47
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_24-47_M-24-47
Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-47_M-24-47
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_24-47_M-24-47
Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_24-47_M-24-47
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 55447-5142	Electronic Service	No	OFF_SL_24-47_M-24-47

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	OFF_SL_24-47_M-24-47
Jim	Erchul	jerschul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	OFF_SL_24-47_M-24-47
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	OFF_SL_24-47_M-24-47
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_24-47_M-24-47
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_24-47_M-24-47
Karolanne	Foley	Karolanne.foley@dairylandpower.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_24-47_M-24-47
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_24-47_M-24-47
Tyler	Glewwe	Tyler.Glewwe@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-47_M-24-47
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-47_M-24-47
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_24-47_M-24-47

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 55402-1425	Electronic Service	No	OFF_SL_24-47_M-24-47
Jeffrey	Haase	jhaase@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-47_M-24-47
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	OFF_SL_24-47_M-24-47
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_24-47_M-24-47
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_24-47_M-24-47
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_24-47_M-24-47
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_24-47_M-24-47
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_24-47_M-24-47
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-47_M-24-47
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-47_M-24-47

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-47_M-24-47
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-47_M-24-47
Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas	N/A	Electronic Service	No	OFF_SL_24-47_M-24-47
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_24-47_M-24-47
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_24-47_M-24-47
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	OFF_SL_24-47_M-24-47
Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission	1902 6th Ave E Hibbing, MN 55746	Electronic Service	No	OFF_SL_24-47_M-24-47
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 53707-1007	Electronic Service	No	OFF_SL_24-47_M-24-47
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_24-47_M-24-47
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-47_M-24-47

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Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-47_M-24-47
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-47_M-24-47
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 52406-0351	Electronic Service	No	OFF_SL_24-47_M-24-47
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-47_M-24-47
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_24-47_M-24-47
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	OFF_SL_24-47_M-24-47
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_24-47_M-24-47
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_24-47_M-24-47
Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	OFF_SL_24-47_M-24-47
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401-1993	Electronic Service	Yes	OFF_SL_24-47_M-24-47

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Rick	Sisk	RSisk@trccompanies.com	Lockheed Martin	1000 Clark Ave. St. Louis, MO 63102	Electronic Service	No	OFF_SL_24-47_M-24-47
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_24-47_M-24-47
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_24-47_M-24-47
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_24-47_M-24-47
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Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-47_M-24-47
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_24-47_M-24-47
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	OFF_SL_24-47_M-24-47
Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-47_M-24-47

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Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_24-47_M-24-47