



December 15, 2025

VIA eFILING

Sydney Lieb, PhD
Assistant Commissioner of Regulatory Analysis
Minnesota Department of Commerce
Division of Energy Resources
85 7th Place East, Suite 500
St. Paul, Minnesota 55101-2198

**RE: In the Matter of Technical Reference Manual Version 5.0
Docket No. E,G-999/CIP-18-694**

Reply Comments

Dear Assistant Commissioner Dr. Lieb:

On October 29, 2025, the Minnesota Department of Commerce ("Department"), Division of Energy Resources filed a draft State of Minnesota Technical Reference Manual ("TRM") for Conservation Improvement Programs, Version 5.0 (the *Draft TRM v.5.0*).¹ CenterPoint Energy Resource Corp., d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy") or ("The Company") provides these *Reply Comments* in response to comments filed by the Center for Energy and Environment ("CEE"),² Fresh Energy,³ Minnesota Energy Resources Corporation ("MERC"),⁴ Otter Tail Power,⁵ and Xcel Energy.⁶ CenterPoint Energy filed its own *Comments*

¹ Docket No. E,G-999/CIP-18-694.

² See *In the Matter of Technical Reference Manual Version 5.0*, Docket No. E,G-999/CIP-18-694, Comments (CEE, Nov. 20, 2025).

³ See *In the Matter of Technical Reference Manual Version 5.0*, Docket No. E,G-999/CIP-18-694, Comments (Fresh Energy, Nov. 20, 2025).

⁴ See *In the Matter of Technical Reference Manual Version 5.0*, Docket No. E,G-999/CIP-18-694, Comments (MERC, Nov. 20, 2025).

⁵ See *In the Matter of Technical Reference Manual Version 5.0*, Docket No. E,G-999/CIP-18-694, Comments (Otter Tail Power, Nov. 20, 2025).

⁶ See *In the Matter of Technical Reference Manual Version 5.0*, Docket No. E,G-999/CIP-18-694, Comments (Xcel Energy, Nov. 20, 2025).

along with participating in *Joint Comments* filed by a group of eleven utilities or utility providers that participate in the TRMAC and/or rely on the TRM for their energy efficiency programs.^{7 8}

CenterPoint Energy thanks the commenting parties for their review of the *Draft TRM v5.0* and for raising concerns regarding the Technical Reference Manual Advisory Committee (“TRMAC”) process and proposed increase in the furnace baseline. The Company provides the following responses to the commenting parties regarding current Minnesota furnace market data, changes to the TRM, and other topics unrelated to the TRM that were raised in TRM comments.

Comments from CEE - ECO Potential Study and Home Energy Squad (“HES”) Assessment Data Provided By Center for Energy and Environment

As noted in *Comments*, CenterPoint Energy reviewed the furnace data in the 2018 ECO Potential Study. The Company believes there are flaws with this data and that it does not reflect the current Minnesota furnace market. This data shows market share for all customer segments and includes furnaces purchased for both new construction and replacements. This dataset does not reflect historic or current installation rates in existing homes that account for recent effects of inflation on the heating ventilation and cooling (“HVAC”) market.

CEE provided Minnesota furnace market data from participants in the HES program. CenterPoint Energy appreciates that CEE was able to present this data in this docket. As stated in CenterPoint Energy’s *Comments*, the Company believes this data is the most representative of the current Minnesota furnace market. However, the dataset still has significant limitations especially when trying to apply its findings to the entire state.⁹ Hennepin County and Ramsey County are disproportionately represented in the HES data, with 88.6% of visits in the Twin Cities and Central East regions. This is important to note since other regions of Minnesota generally have an older housing stock compared to Twin Cities and Central East Regions.¹⁰ Older homes typically have more obstacles to installing condensing gas furnaces and are thus most likely have lower efficiency equipment installed. Since the data does not adequately capture the state of the HVAC market in Minnesota, CenterPoint Energy continues to support a market study to inform the installation across the state and summarize the availability of furnace models available on the market.

CEE recommended periodic updates to baseline efficiencies to ensure the baselines continue to reflect market conditions as accurately as possible. CenterPoint Energy agrees with this insofar as the equipment availability, and the ability for customers to install the measure are among the factors considered. However, equipment baselines have not historically been based on market

⁷ See *In the Matter of Technical Reference Manual Version 5.0*, Docket No. E,G-999/CIP-18-694, Comments (CenterPoint Energy, Nov. 20, 2025).

⁸ See *In the Matter of Technical Reference Manual Version 5.0*, Docket No. E,G-999/CIP-18-694, Joint Comments (Nov. 20, 2025).

⁹ This includes geographic limitations, sampling bias, inconsistent income qualification, and the exclusion of homes with furnaces where AFUE was not reported.

¹⁰ See *In the Matter of Technical Reference Manual Version 5.0*, Docket No. E,G-999/CIP-18-694, Comments. Pg. 5-6 (CenterPoint Energy, Nov. 20, 2025).

characterizations. The Company would also expect periodic updates to baseline efficiencies for TRM measures to be applied consistently across all measures. The *Draft TRM v5.0* appears to selectively apply the updated furnace baseline based on a new flawed market characterization standard to reduce the energy savings of natural gas equipment measures while preserving the current energy savings from ASHP and windows measures.

With regards to CEE's recommendations, CenterPoint Energy position is:¹¹

- #1: Market characterization has not historically been a reasonable basis for baseline assumptions. The Company is concerned with the low evidence bar set for changes to the TRM. Especially given the geographic and other biases in the most robust dataset submitted to the regulatory record.
- #2 & 3: CenterPoint Energy does not believe these specific modifications have been fully evaluated and vetted through the TRMAC process or this regulatory process. The Company also does not take a position on these proposals for specific implementation of proposed TRM changes to the furnace baseline. However, the Company generally supports energy savings algorithms that are based on customer specific information as an option that utilities can use in their ECO programs.
- #4: CenterPoint Energy agrees with CEE that arbitrarily implemented updates to the TRM are not technically sound or appropriate.
- #5 & 6: CenterPoint Energy believes these are not appropriately within scope recommendations about triennial plans and triennial planning for a regulatory process focused on the TRM.¹²

As stated in *Comments*, the Company believes state energy code and federal equipment standards remain the most appropriate basis for setting measure baselines in the TRM and are in alignment with the standards used through the TRM currently.

Comments from CEE - ECO Plan Impact Analysis

As stated in its *Comments*, CenterPoint Energy estimated a nearly 10% decrease in 2024 portfolio energy savings when the furnace baseline increase was applied. This contrasts with the 6 percent decrease that CEE estimated. Part of the difference is related to the Company's inclusion of air source heat pumps ("ASHP"), but it also appears estimates of the effect on furnaces differ. There is agreement on the 11 percent decrease on insulation energy savings from applying the change in furnace baseline. Table 1 below shows in more detail the Company's calculation of measure changes to 2024 energy savings based on modifying filed and approved 2024-2026 Triennial Plan energy savings algorithms.

¹¹ See *In the Matter of Technical Reference Manual Version 5.0*, Docket No. E,G-999/CIP-18-694, Comments pg. 19 (CEE, Nov. 20, 2025).

¹² These two recommendations for ongoing ECO stakeholder processes would occur for any significant change to ECO programs including the implementation of new measure baselines in the TRM.

Table 1. Effect of Increasing the Furnace Baseline on 2024 Program Performance¹³

		Actual 2024 Savings	Revised 2024 Savings	2024 Participation	Actual 2024 Savings	Revised 2024 Savings
Program	Measure	Dth/measure	Dth/Measure	# of Measures	Dth	Dth
Home Efficiency Rebates	92% AFUE furnace	11.97	2.03	904	10,821	1,835
	96% AFUE furnace	14.00	3.84	8,043	112,602	30,885
	97% AFUE furnace	14.67	4.44	6,098	89,458	27,075
Home Efficiency Rebates - EFS	7.8 HSPF2 ASHP w/ existing furnace	18.76	15.30	114	2,139	1,744
	7.8 HSPF2 ASHP + 92% AFUE furnace	25.21	15.65	24	605	376
	7.8 HSPF2 ASHP + 96% AFUE furnace	26.42	16.61	322	8,507	5,348
	7.8 HSPF2 ASHP + 97% AFUE furnace	26.83	16.94	1,201	32,223	20,345
Home Insulation Rebates	AVG Weatherization	21.09	18.77	2,647	55,825	49,684
Low-Income Weatherization	AVG Weatherization	30.42	27.07	417	12,685	11,290
	92% AFUE furnace	11.97	2.03	0	0	0
	96% AFUE furnace	14.00	3.84	217	3,038	833
	97% AFUE furnace	14.67	4.44	19	279	84
Low-Income Rental Efficiency	AVG Weatherization	24.20	21.54	11	266	237
	92% AFUE Furnace	11.97	2.03	0	0	0
	96% AFUE Furnace	14.00	3.84	50	700	192
	97% AFUE Furnace	14.67	4.44	0	0	0
Non-Profit Affordable Housing	AVG Weatherization (retrofit)	7.77	6.92	30	233	207
	92% AFUE furnace (retrofit)	11.97	2.03	5	60	10
	96% AFUE furnace (retrofit)	14.00	3.84	7	98	27
	97% AFUE furnace (retrofit)	14.67	4.44	2	29	9
Total (Dth)					329,568	150,183
2024 ECO Portfolio (Dth)					1,890,592	1,711,207
					% Change	9.5%

Comments from Fresh Energy – Equipment Rebates, Measure Life, and Affordability

Fresh Energy proposed phasing out ECO incentives for gas furnaces in new construction beginning in 2027. Fresh Energy also recommended ending incentives beginning in 2027 for

¹³ The portfolio Minnesota cost-effectiveness test results changed from about 3.62 (or \$198,500,000) to 3.15 (or \$158,800,000).

central air conditioning (“AC”) systems, gas water heaters, gas clothes dryers, and gas hearths/fireplaces.

The TRM regulatory process is not the appropriate forum to discuss rebate levels. The TRMAC is tasked with developing standard approved calculation methods and inputs for calculating savings impacts and cost-effectiveness. Historically, rebate level changes have not been considered during TRMAC meetings or in TRM filings as rebate levels are determined, set, and approved via utility ECO Plan dockets. That said, CenterPoint Energy disagrees with Fresh Energy’s recommendations and continues to support the inclusion of these measures in the TRM. ECO statutes encourage the systematic and aggressive pursuit of energy savings (including efficient fuel-switching) and load management programs to produce a variety of benefits such as reduced utility costs, economic benefits, and emissions reductions. The Company disagrees with policy approaches that eliminate rebates for any type of energy saving equipment since measures should be evaluated on their energy savings and cost-effectiveness.

An approach that ends rebate incentives for specific measures would likely harm Minnesota’s energy efficiency performance.¹⁴ Fresh Energy does not provide evidence to support their belief that ending rebate incentives will result in customers not installing the particular equipment they seek to end rebates for. Fundamentally, ECO programs should be designed to systematically and aggressively pursue energy savings cost-effectively. Fresh Energy has not supplied any data or argument for why their approach to ECO planning through phasing out rebates is in alignment with the purpose of ECO programs. CenterPoint Energy believes Fresh Energy’s approach would be more likely to result in customers backsliding to lower efficiency equipment. The Company also would expect this approach to discourage HVAC trade allies from engaging with energy efficiency programs when out of alignment with customer requests for equipment and services.

Fresh Energy also recommended adopting a 50-year measure life for insulation and air sealing measures. In their *Comments*, they noted that Department Staff were instructed to revisit measure lifetimes in the next TRM cycle to determine whether adjustments beyond the default 20-year cap are appropriate. Measure lifetimes currently represented in the TRM are a result of TRMAC technical analysis of available data and documentation in response to the noted instructions to Department Staff. For example, the Residential Envelope – Insulation and Air Sealing measure was updated to a 35-year measure lifetime beginning in TRM v4.1. Fresh Energy also recommended adopting a 40-year measure life for high performance windows. The TRMAC reviewed the high-performance windows measure in 2024. Thus, the Residential Envelope – High Performance Windows measure was added to the TRM with a 36-year measure lifetime starting with TRM v4.2. CenterPoint Energy continues to support using the TRMAC process to evaluate changes to the TRM such as changes to measure lifetimes.

¹⁴ For example, Fresh Energy recommends ending incentives for gas hearths/fireplaces, arguing that these measures are no longer essential home heating equipment and are only decorative. The Company does not understand what this has to do with whether or not a rebate helps save energy. If customers are going to choose to install decorative features, ECO programs should encourage them to install high-efficiency options.

Lastly, Fresh Energy recommended that utilities be required to “[monitor and report] rebate uptake by income level and geography, with course corrections if low-income, high energy-burden, and environmental justice communities are not proportionately accessing these [ECO rebate] benefits.” CenterPoint Energy does not believe the TRM is the appropriate forum for discussing status report and low-income program reporting requirements.¹⁵

Comments from MERC

CenterPoint Energy appreciates MERC’s comments on trade ally networks and household equipment installation decisions. The Company agrees with MERC that the furnace baseline should represent the equipment that customers would reasonably be expected to install in the absence of an energy efficiency program. CenterPoint Energy agrees with MERC that a residential furnace baseline update would misrepresent the current market in Minnesota. Households are still purchasing furnaces without utility incentives. As previously stated, the Company also believes that a baseline update would affect more price-sensitive customers including low-income households that have less flexibility to absorb higher equipment costs.

The Company thanks MERC and agrees with their insight on how a baseline change could disrupt trade ally engagement and support for ECO programs. The Company is also concerned that a sudden furnace baseline change would decrease contractor engagement across programs. Trade allies play a critical role in guiding customers’ purchase decisions by recommending the most energy efficient HVAC equipment that matches the needs of their home.

Comments from Otter Tail Power

CenterPoint Energy appreciates Otter Tail Power’s *Comments* on three of the measure updates included in the *Draft TRM v5.0*. The Company supports the assertion by Otter Tail Power that the TRM should remain a complete, inclusive, and up to date guide for all utilities. The Company agrees that a TRM with inconsistent assumptions between measures results in an unlevel playing field.

The Company thanks Otter Tail Power for their perspective on the HVAC market. The Company agrees that there are limited opportunities to influence customer purchasing decisions as many households are making purchasing decisions only after their equipment fails. The Company notes that it has also seen that customers switching from a non-condensing to a higher efficiency condensing furnace are required to invest in the installation of a new venting system to

¹⁵ The Company believes that some of this monitoring and reporting may be feasible. For example, the Company already reports city level aggregated data to communities requesting this data. However, it is not clear to the Company what the parameters are for the reporting that Fresh Energy is recommending. For example, Fresh Energy should clearly define “low-income, high energy-burden, and environmental justice communities” in this context, which would also be useful for determining if the information is available for doing such reporting. That said, the Company does not support the collection and retention of detailed income information about its customers. The Company believes that income-qualifying customers who are already reluctant to share information on their income would not be supportive of that retention and use of their income data.

accommodate a condensing furnace. Utility incentives help with these upfront costs and play an important role in influencing customer decisions.

Comments from Xcel Energy

Xcel Energy provided additional information from their experience in their Colorado service area. CenterPoint Energy thanks Xcel Energy for providing further detail on the Colorado Commission from the perspective of a participating utility.

In response to Fresh Energy's support of a proposal to phase out rebates for central AC systems via a change to the Residential HVAC – Efficient Air Conditioning Systems measure in the TRM, Xcel Energy noted that the TRMAC meetings this year included discussions regarding efficient air conditioning equipment that led to a technically sound decision of not adjusting the viable Central AC measure. The Company agrees with Xcel Energy that this process and analysis by the TRMAC regarding efficient air conditioning equipment led to a technically supported outcome. As noted in feedback the Company provided to the Department, the Company does not recall an historic instance where an available energy efficient equipment measure was removed from the TRM. The Company appreciated the feedback from the TRMAC members with expertise in the Central AC market as the Company does not have extensive experience in this market.

The Company appreciates Xcel Energy's further technical review of specific measure details in the *Draft TRM v5.0*. As noted in Xcel Energy's technical review, an inconsistent application of the proposed furnace baseline resulted in technical deviations and potential issues within the TRM.

Xcel Energy also presented the Itron study regarding furnaces and boilers. The Company is familiar with this study and has previously used it as a reference when developing technical assumptions for ECO programs. The Company supports the TRMAC continuing to review incremental costs for TRM measures using the latest available data.

Conclusions

CenterPoint Energy has actively participated in the TRMAC process (i.e., providing feedback, technical expertise, and data) since the TRMAC's formation more than a decade ago. Generally, the Company appreciates the Department-led process for the development of numerous TRM revisions and updates. The process has been smooth, data driven, and consensus based prior to this year.

Regarding the proposal to increase the furnace baseline, the Department and other commenters have failed to provide data driven evidence for the changes to the TRM, especially when considering the significant effects of the change. The reasoning for by-passing the TRMAC process that is specifically designed as the venue for such impactful and complicated changes remains unstated in the regulatory record. Finally, no justification has been supplied for why

furnaces should be treated differently using new and often not clearly articulated standards than other measures in the TRM.¹⁶

Commenters also proposed several recommendations that are more suited for other regulatory policy processes and dockets. The Company recommends that recommendations regarding utility ECO programs design beyond TRM assumptions should not be considered in this TRM docket. Examples of this type of policy include CEE's recommendations regarding utility ECO programs response to TRM updates and Fresh Energy's proposals for sunseting utility rebate incentives for current energy efficiency measures.

CenterPoint Energy reaffirms the recommendations made in its *Comments* and the utility *Joint Comments*.^{17 18} The Company recommends the following changes to the proposed *Draft TRM v5.0*:

- The initial solution proposed by Department Staff to carry out market research on furnaces (and preferably all HVAC equipment) in all of Minnesota in the next few years to inform TRM v6.0 should be pursued.
- Maintaining the baseline for relevant furnace measures at 80 percent in TRM v5.0 for the following measures:
 - Residential HVAC - Furnaces and Boilers
 - Residential Envelope - Insulation and Air Sealing
 - Residential HVAC - ECM Blower Motors
 - Residential HVAC - Furnace Quality Installation/ Maintenance
 - Residential HVAC - Ground Source Heat Pumps

As in past years, the Company appreciates the ability to file comments and reply comments regarding the proposed draft version of the TRM. The Company also appreciates that the regulatory process for TRM 5.0 occurred earlier in the year to accommodate busy end of year schedules.

If you have questions, please contact me at Tyler.Glewwe@CenterPointEnergy.com or 612-321-4905.

¹⁶ For example, informally the Department has referenced concerns with free ridership, but as the Department knows the TRM and all ECO programs are not designed with a "net-to-gross" evaluation in mind and Minnesota does not currently have the policies in place to do so. Net-to-gross refers to the ratio of "gross" energy savings relative to adjusted "net" energy savings that account for factors such as free-ridership and spillover effects. The Company is concerned that the Department is not transparently and clearly advancing new ECO policy in a dedicated stakeholder and regulatory filing process docket that has implications for all 2027-2029 ECO programs in favor of selective application through the TRM process.

¹⁷ See *In the Matter of Technical Reference Manual Version 5.0*, Docket No. E,G-999/CIP-18-694, Comments. Pg 11-12 (CenterPoint Energy, Nov. 20, 2025).

¹⁸ See *In the Matter of Technical Reference Manual Version 5.0*, Docket No. E,G-999/CIP-18-694, Joint Comments. Pg. 7-8 (Nov. 20, 2025).

Sincerely,

/s/ Tyler J. Glewwe

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C: Service List

In the Matter of Technical Reference Manual Version 5.0	Docket No. E,G999/CIP-18-694
December 15, 2025	Reply Comments

CERTIFICATE OF SERVICE

I, Tyler Glewwe, served the attached *Reply Comments* of CenterPoint Energy on the attached service list for Docket No. E,G999/CIP-18-694 by electronic service.

/s/ Tyler Glewwe

Regulatory Analyst, Energy Conservation and Optimization Programs
CenterPoint Energy

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3	Kathy	Baerlocher	kathy.baerlocher@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	18-694CIP-18-694
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35	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	18-694CIP-18-694
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43	Tim	Miller	tim.miller@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	18-694CIP-18-694
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45	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	18-694CIP-18-694
46	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	18-694CIP-18-694
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48	Larry	Oswald	larry.oswald@mdu.com	Great Plains Natural Gas Company		105 W Lincoln Ave PO Box 176 Fergus Falls MN, 56538-9001 United States	Electronic Service		No	18-694CIP-18-694
49	Leah	Peterson	lpeterson@mnpower.com	Minnesota Power		30 West Superior St Duluth MN, 55802 United States	Electronic Service		No	18-694CIP-18-694
50	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	18-694CIP-18-694
51	Joe	Plummer	jplummer@franklinenergy.com	Franklin Energy Services, LLC		2303 Wycliff St Suite 2E St. Paul MN, 55114 United States	Electronic Service		No	18-694CIP-18-694
52	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	18-694CIP-18-694
53	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric		4300 220th St W	Electronic Service		No	18-694CIP-

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Association		Farmington MN, 55024-9583 United States				18-694
54	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	18-694CIP-18-694
55	Anne	Rittgers	arittgers@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	18-694CIP-18-694
56	Merlin	Sawyer	merlin.sawyer@mrenergy.com	Missouri River Energy Services		3724 W AVERA DR PO BOX 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	18-694CIP-18-694
57	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	18-694CIP-18-694
58	Ben	Schoenbauer	bschoenbauer@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	18-694CIP-18-694
59	Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	18-694CIP-18-694
60	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	18-694CIP-18-694
61	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	18-694CIP-18-694
62	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	18-694CIP-18-694
63	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 United States	Electronic Service		No	18-694CIP-18-694
64	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	18-694CIP-18-694
65	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis	Electronic Service		No	18-694CIP-18-694

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
66	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	18-694CIP-18-694
67	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	18-694CIP-18-694
68	Shawn	White	shawn.m.white@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	18-694CIP-18-694
69	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	18-694CIP-18-694
70	Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box Sioux Falls SD, 57109-8920 United States	Electronic Service		No	18-694CIP-18-694
71	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-8920 United States	Electronic Service		No	18-694CIP-18-694
72	Cristina	Zuniga	czuniga@otpc.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538 United States	Electronic Service		No	18-694CIP-18-694

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11	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	ECO SPECIAL SERVICE LIST
12	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
13	Bradley	Davison	bradley.davison@mdu.com	Great Plains Natural Gas Company			Electronic Service		No	ECO SPECIAL SERVICE LIST
14	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
15	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
16	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
17	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
18	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
19	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
20	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
21	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
22	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
23	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
24	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
25	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
26	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
27	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
28	Zach	Klabo	zach.klabo@mdu.com	Great Plains Natural Gas Company			Electronic Service		No	ECO SPECIAL SERVICE LIST
29	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
30	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
31	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
32	Martin	Lepak	martin.lepak@aeoa.org	Arrowhead Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
33	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
34	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
35	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906	Electronic Service		No	ECO SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
36	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
37	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	ECO SPECIAL SERVICE LIST
38	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
39	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
40	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
41	Larry	Oswald	larry.oswald@mdu.com	Great Plains Natural Gas Company		105 W Lincoln Ave PO Box 176 Fergus Falls MN, 56538-9001 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
42	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
43	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
44	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
45	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	ECO SPECIAL SERVICE LIST
46	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501	Electronic Service		No	ECO SPECIAL SERVICE LIST

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						United States				
47	Laura	Silver	laura.silver@state.mn.us		Department of Commerce	85 7th Place E, Suite 500 St. Paul MN, 55101 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
48	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
49	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
50	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
51	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 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
52	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
53	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
54	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
55	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
56	Cristina	Zuniga	czuniga@otpc.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST