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January 22, 2026

**VIA eFILING**

Ms. Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101-2116

**Re: In the Matter of CenterPoint Energy's Natural Gas Innovation Plan**

**Docket No. G-008/M-23-215**

**REQUEST FOR APPROVAL OF BUDGET MODIFICATION AND COMPLIANCE FILING**

Dear Ms. Bergman:

CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits this filing to the Minnesota Public Utilities Commission ("Commission") for approval of a proposed budget modification for Pilot D: Green Hydrogen Blending into Natural Gas Distribution System and to inform the Commission and parties of possible implications for federal funding in the event that authorization to proceed with the Pilot under the revised budget is delayed.<sup>1</sup>

Based on updated cost estimates and engineering work, the overall capital costs of Pilot D have increased from the preliminary budget developed in 2023 due to the impacts of inflation, evolving market conditions for labor and materials, and the incorporation of more detailed engineering and design information. While Order Paragraph 26 of the Commission's October 9, 2024 Order Approving Natural Gas Innovation Plan with Modifications authorized the Company to exercise budget flexibility without prior Commission approval, the Commission requires that any budget increases exceeding 25 percent of the total five-year pilot budget go through the annual review process or be filed for comment and approval in Docket No. 23-215.<sup>2</sup>

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<sup>1</sup> In compliance with Order Point 2 of the Commission's November 13, 2025 Order in this docket, which required CenterPoint to file a notification in this docket if its estimated beginning of-construction or in-service dates for the electrolyzer and solar array for Pilot D are delayed in any way that may jeopardize the receipt of expected federal tax credits.

<sup>2</sup> The Commission's order authorizes the use of budget flexibility without prior Commission approval where the proposed budget increase is less than or equal to 25 percent of the total five-year pilot budget but limits the use of that budget flexibility mechanism until the third year of the plan in order to provide sufficient time for pilots to reach maturity and enroll participants. The Commission's Order also requires that the Company notify the Department of Commerce, Division of Energy Resources and the Office of the Attorney General – Residential Utilities Division, when it exercises budget flexibility without a modification and requires the Company to request Commission approval of the proposed budget modification if either party objects.

CenterPoint Energy is excited about the potential learnings, creation of high-quality jobs and training opportunities, and emissions reductions that will be achieved through implementation of Pilot D. Further, as discussed in comments submitted on the Company's 2023 NGIA Plan Annual Report, CenterPoint Energy remains committed to maximizing available federal funding for the Pilot under the One Big Beautiful Bill Act ("OBBBA"),<sup>3</sup> and has taken proactive steps to maximize available funding. However, the Company requires certainty to move forward with Pilot D pursuant to the revised budget and delays in approval of the modified budget would jeopardize CenterPoint Energy's ability to secure available federal tax benefits. In order to secure solar investment tax credits ("ITCs") for the project, beginning of construction for the on-site solar generation must be established by July 4, 2026.<sup>4</sup> Pilot D's revised estimate for ITC eligibility is \$780,000 based on the FEED study's revised capital cost estimate

CenterPoint Energy respectfully requests that the Commission approve the proposed budget modification as detailed in this filing on or before June 4, 2026 to allow sufficient time for the Company to meet the ITC deadline.

The filing below details the issue at present, as well as the Company's recommended resolution. If you have questions, please contact me at [Trey.Harsch@centerpointenergy.com](mailto:Trey.Harsch@centerpointenergy.com) or 612-321-5191.

Sincerely,

*/s/ Trey Harsch*

Manager, Regulatory Affairs

Attachments

C: Service List

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<sup>3</sup> H.R. 1 (2025), Pub. L. No. 119-21.

<sup>4</sup> See Internal Revenue Service Notice 2025-42 (Aug. 8, 2025), available at [Notice 2025-42, Beginning of Construction Requirements for Purposes of the Termination of Clean Electricity Production Credits and Clean Electricity Investment Credits for Applicable Wind and Solar Facilities](#)

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

**Katie J. Sieben  
Joseph K. Sullivan  
Audrey Partridge  
Hwikwon Ham  
John A. Tuma**

**Chair  
Vice Chair  
Commissioner  
Commissioner  
Commissioner**

In the Matter of CenterPoint’s Natural Gas  
Innovation Plan

Docket No. G-008/M-23-215

**REQUEST FOR APPROVAL OF BUDGET  
MODIFICATION AND COMPLIANCE FILING**

**I. INTRODUCTION**

Through the completion of a Front-End Engineering Design (“FEED”) study, CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or the “Company”) has determined that capital costs associated with Pilot D: Green Hydrogen Blending into Natural Gas Distribution System (“Pilot D” or the “Pilot”) in its Natural Gas Innovation Act (“NGIA”) Plan (the “Plan” or the “NGIA Plan”) are expected to exceed the preliminary capital cost estimates included in the Company’s initial NGIA Plan submitted in 2023. The FEED study projected increases to capital costs related to both the solar and electrolyzer facilities for Pilot D relative to the initial cost estimates filed in this docket due to the impacts of inflation, evolving market conditions for labor and materials, and the incorporation of more detailed engineering and design information.

The increase to the forecasted capital costs are mitigated, in part, by improved estimates for Production Tax Credits (“PTCs”) from the production of hydrogen due to the delayed implementation of hourly matching requirements. The Pilot may also be eligible for additional PTC funding after hourly-matching requirements are implemented pending an evaluation of the cost-effectiveness of pursuing these additional funds after the market for hourly-matched renewable energy credits (“RECs”) develops. Additionally, the anticipated operational start date of the facility is later than initially assumed, reducing operation costs during the five-year Innovation Plan.

While the overall capital costs of the project are projected to increase approximately \$2.4 million,<sup>5</sup> the anticipated impact to the five-year plan budget, accounting for updated PTC impacts and operational start date, is approximately \$0.5 million.

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<sup>5</sup> As discussed in this filing, the FEED study notes a 25% range of accuracy for the revised capital cost estimate, resulting in a range of forecasted capital costs of \$5.9 million to \$9.2 million or increases of \$0.9 to \$4.2 million.

Through this filing, CenterPoint Energy respectfully requests that the Minnesota Public Utilities Commission (“Commission”) approve a proposed budget modification for Pilot D to allow the Company to proceed with the Pilot and commence construction on a timeline to qualify for Investment Tax Credits (“ITCs”) under the One Big Beautiful Bill Act (“OBBBA”).<sup>6</sup> As detailed in this filing, CenterPoint Energy requests approval from the Commission to move forward with Pilot D pursuant to the revised budget and asks that the Commission act on this request on or before June 4, 2026 to ensure the Company will be able to maximize available federal tax benefits.

As detailed below, CenterPoint Energy requests approval to supplement its Pilot D budget with funds from other sources within the Company’s NGIA Plan. While Order Point 26 of the Commission’s October 9, 2024 Order Approving Natural Gas Innovation Plan with Modifications authorized the Company to exercise budget flexibility without prior Commission approval in specific circumstances, the Commission required that any budget increases exceeding 25 percent of a pilot’s total five-year budget go through the annual review process or be filed for comment and approval in Docket No. 23-215.<sup>7</sup>

To secure solar investment tax credits (“ITCs”) for the project, beginning of construction for the on-site solar generation must be established by July 4, 2026. Without budget certainty, the Company is hesitant to make the investments necessary to meet the July 4, 2026 deadline.<sup>8</sup> The importance of ensuring the Company is able to maximize federal funds was recently re-emphasized by the Commission through its November 13, 2025 Order in this docket, where the Commission required the Company to file a notification in this docket in the event that its estimated beginning of construction or in service dates for its electrolyzer and solar array for Pilot D were delayed in any way that may jeopardize the receipt of expected federal tax credits. Similarly, the Company wants to ensure it meets federal deadlines to maximize benefits and minimize costs for customers and has taken proactive steps to maximize available funding. CenterPoint Energy respectfully requests that the Commission approve the proposed budget modifications as detailed in this filing on or before June 4, 2026 to allow CenterPoint Energy to proceed with Pilot D and ensure sufficient time for the Company to meet the ITC deadline.

## II. BACKGROUND

On June 28, 2023, CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas filed its first NGIA Plan. CenterPoint Energy’s Plan, which included 17 pilot projects and seven research-and-development projects, was approved by the Commission with modifications through its October 9, 2024 Order in this docket.

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<sup>6</sup> H.R. 1 (2025), Pub. L. No. 119-21.

<sup>7</sup> The Commission’s order authorizes the use of budget flexibility without prior Commission approval where the proposed budget increase is less than or equal to 25 percent of the total five-year pilot budget but limits the use of that budget flexibility mechanism until the third year of the plan in order to provide sufficient time for pilots to reach maturity and enroll participants. The Commission’s Order also requires that the Company notify the Department of Commerce, Division of Energy Resources and the Office of the Attorney General – Residential Utilities Division, when it exercises budget flexibility without a modification and requires the Company to request Commission approval of the proposed budget modification if either party objects.

<sup>8</sup> The Company may establish that construction has begun prior to this deadline by incurring five percent or more of the total cost of the facility.

Included within the Company's approved Plan is a pilot to develop a 1-megawatt green hydrogen plant at an existing Company facility in Mankato, Minnesota. This Pilot will incorporate on-site solar generation, an electrolyzer, hydrogen storage, and supporting systems to produce hydrogen and blend it into the natural gas distribution system and eliminate an estimated 27,993 metric tons of CO<sub>2</sub>e over its lifetime. The Commission approved this Pilot with a five-year Plan budget of \$4,646,943.

On May 30, 2025, CenterPoint Energy filed its first NGIA annual report ("Report"). This Report included information on activities during the final three months of 2024, after the Company's Plan had only just been approved by the Commission in October of 2024. Through the Report the Company detailed the preliminary actions taken to lay the groundwork for each pilot's future success.

In its November 13, 2025 Order in this docket, the Commission approved the Company's annual Report, having made no modifications to any of the Company's pilot projects. Through this Order, the Commission also required CenterPoint Energy to file a notification in this docket in the event that its estimated beginning of construction or in service dates for its electrolyzer and solar array for Pilot D are delayed in any way that may jeopardize the receipt of expected federal tax credits.

### **III. RISK TO PILOT D TAX CREDITS**

The initial budget for the Pilot D provided by the Company in its June 28, 2023 Innovation Plan filing was largely informed by a technical memo provided by Standby Systems ("Standby") in 2023, which included a preliminary capital cost estimate based on early understandings of the Pilot's intended scope and technical requirements. In 2025, Standby conducted a FEED study which included a more refined preliminary capital cost estimate for the Pilot based on vendor quotations, similar project experience, and industry benchmarks. Standby estimated that capital costs for Pilot D would exceed the initial estimate.

The FEED study estimated Pilot D's capital costs would be approximately \$7.4 million, a \$2.4 million increase from the original estimate. This results in a \$4.8 million increase to the lifetime total revenue requirement associated with the capital costs<sup>9</sup> of the Pilot. The accuracy range associated with the FEED study's estimate included a plus or minus 25% range of accuracy, placing the estimated capital cost between \$5.9 million and \$9.2 million.

This increase in costs is the result of numerous factors, including updated understandings of the technical requirements for the project, expansion of scope included in the estimate, increases to market pricing of critical components, general inflation, and high-levels of uncertainty typically associated with early-stage cost estimates for large infrastructure projects. For example, the initial estimate for electrolyzer costs assumed a lower-cost packaged unit would be used. However, the revised estimate assumes a higher-cost custom-built electrolyzer, similar to that used at the Minneapolis hydrogen plant, would be required due to available packaged units

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<sup>9</sup> Lifetime total revenue requirement for capital costs is the revenue requirement over the depreciable life of the facility for the estimated capital costs. Operations and maintenance costs are not included. This value was included as a reference for the lifetime utility costs specifically attributable to capital costs. Value calculation can be found on the "5-Yr NGIA Budget" tab of Attachment 1.

failing to meet Mankato's cold-weather conditions without significant weatherization modifications that may impact commercial guarantees.

The projected increase to Pilot D's capital costs are mitigated, in part, by improved estimates for PTCs from the production of hydrogen. Lifetime costs estimated by the Company conservatively assume that PTCs will not be received for grid-sourced electricity following the IRS's implementation of hourly-matching requirements for RECs.<sup>10</sup> The costs estimated by the Company in its March 15, 2024 filing assumed that hourly-matching requirements would begin in 2028, however final regulations published by the IRS on January 10, 2025 confirmed hourly-matching requirements would not begin until 2030.<sup>11</sup> In total, Pilot D's revised estimate for PTC eligibility increased by approximately \$370,000 prior to 2030. The Pilot may be eligible for additional PTC funding after hourly-matching requirements are implemented, however the cost-effectiveness of pursuing these additional funds can't be accurately determined until the market for hourly-matched RECs further develops.

Furthermore, costs estimated by the Company in the March 15, 2024 filing assumed a full year of operation in Year 3 of the Plan. However, updated estimates for construction schedule do not project the facility to begin operation until at least midway through Year 3 of the Plan. Pilot D's revised cost estimates thus assume a half year of operations during Year 3, reducing operation costs during the five-year Innovation Plan.

The combined impact of the increased capital costs, revised PTC eligibility, and revised operation schedule is equivalent to a roughly \$0.5 million increase to the Pilot's budget under the approved five-year Innovation Plan.

Table 1 below displays Pilot D's updated cost estimates against the budget estimates provided in the Company's initial filing.

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<sup>10</sup> Hourly-matching requirements are expected to significantly impact the price of RECs, given the likelihood of strong competition for RECs produced during periods of lower renewable output. How the market conditions for hourly-matched RECs ultimately develop is highly speculative, leading to high uncertainty for cost. Therefore, any PTC benefits that would require hourly-matched RECs are conservatively excluded in the cost estimate for this pilot.

<sup>11</sup> See Internal Revenue Service RIN 1545-BQ97 (Jan. 10, 2025), available at [RIN 1545-BQ97 Credit for Production of Clean Hydrogen and Energy Credit](#)

**Table 1: Pilot D Estimated Costs After FEED Study<sup>12</sup>**

	<b>Initial Plan (\$ million)</b>	<b>Updated Estimate (\$ million)</b>	<b>Difference (\$ million)</b>	<b>Difference (%)</b>
Total Capital Costs <sup>13</sup>	5.0 <sup>14</sup>	7.4 <sup>15</sup>	2.4	47%
Solar	2.0	2.6	0.6	31%
Hydrogen	2.2	3.8	1.6	71%
Permitting, Design, and Installation	0.9	1.1	0.2	24%
Total Incremental Costs Counting Against 5-Year Budget	4.6	5.1	0.5	10%

To receive federal ITCs for Pilot D’s on-site solar generation, beginning of construction for the solar components of the project would need to be established prior to July 4<sup>th</sup>, 2026, as clarified in IRS Notice 2025-42. Start of construction may be established if five percent or more of the total costs of the facility are incurred by the taxpayer. However, knowing that the budget for Pilot D will exceed what was initially anticipated, the Company is hesitant to make the required investments in pilot-related components necessary to receive federal tax credits without first receiving confirmation from the Commission about the ability to increase the Pilot’s budget.

Pilot D’s revised estimate for ITC eligibility is \$780,000 based on the FEED study’s revised capital cost estimate. This value is subject to change based on final cost of the project and allocation of shared expenses between solar and hydrogen components.

Under the Commission’s October 9, 2024 Order, CenterPoint Energy would be unable to leverage the process defined budget flexibility until year 3 of its NGIA Plan. The Company is unable to wait until year three of the plan<sup>16</sup> – which would begin October 9, 2026 – to receive the clarity it requires to make the investments necessary to receive federal tax credits for Pilot D. Without clarity from the Commission ahead of the July 4<sup>th</sup> 2026 deadline, pilot construction may be delayed. Because this situation puts into question CenterPoint Energy’s ability to receive federal tax credits for Pilot D, the Company felt it appropriate to bring this matter before the Commission, consistent with its November 13, 2025 Order.

#### **IV. REQUEST TO MOVE BUDGET TO PILOT D**

To avoid construction delays and risk the receipt of anticipated federal tax credits for Pilot D, CenterPoint Energy requests to increase Pilot D’s budget ahead of the July 4<sup>th</sup>, 2026 deadline. Specifically, CenterPoint Energy proposes moving funds from its RNG Request for Proposals

<sup>12</sup> Please see Attachment 1 for additional information

<sup>13</sup> Note that capital costs for solar and hydrogen components are not mutually exclusive. The cost subsets noted in the table include estimated allocations from the FEED study of shared costs between solar and hydrogen.

<sup>14</sup> Please note, sub totals may not sum to totals due to rounding. See Attachment 1 for unrounded values.

<sup>15</sup> Id.

<sup>16</sup> The Commission approved CenterPoint’s Innovation Plan in October 2024. At that point, year one of the Innovation Plan began and ran through October of 2025. Year three of the plan would occur between October 9, 2026 through October 8, 2027.

(or “Pilot C”) five-year plan budget to supplement Pilot D. Alternatively, the Company would propose leveraging some of the roughly \$8.5 million in reserve R&D funding to supplement Pilot D.

To cover the anticipated budget deficit CenterPoint Energy would need to increase Pilot D’s budget by \$468,412, which is the difference in Total Incremental Costs Counting Against 5-Year Budget between the updated and initial estimate as presented in Table 1. In addition to this amount, CenterPoint Energy would request \$935,972<sup>17</sup> to ensure it has enough funding to cover the full 25% range of accuracy for the Pilot’s capital costs, as estimated by the FEED study. The Company has separated these requests, recognizing that the Commission has previously considered contingency funding separately when reviewing NGIA pilot budgets.<sup>18</sup> However, the Company’s full budget flexibility request includes both these amounts, totaling \$1,404,384.

1. **Initial Budget Increase Request:** \$468,412
2. **Contingency Budget Increase Request:** \$935,972
3. **Full Increase Request (lines 1 + 2):** \$1,404,384

Regardless of the Commission’s decision, the Company commits to ensuring that all on-going costs associated with NGIA pilots that extend beyond the Innovation Plan’s five-year lifespan are included within the budget of subsequent plans, including but not limited to the costs associated with Pilot D. This ensures that ongoing costs associated with NGIA pilots continue to be accounted for, consistent with Order Paragraph 2 of the Commission’s Order approving Xcel Energy’s first Innovation Plan.<sup>19</sup>

Below, CenterPoint Energy elaborates on each of its proposals, addressing the limitations and requirements established by Order Paragraph 26 of the Commission’s October 9, 2024 Order for each.

#### **a. Moving Budget from Pilot C**

CenterPoint Energy’s preferred option would be to leverage excess funding from Pilot C to supplement Pilot D. Through Pilot C, the Company issued an RFP to purchase RNG from various sources. In the time since the Company’s last annual Report, the Company completed its RFP process and signed contracts with three RNG producers. Pilot C’s approved budget during the five-year Innovation Plan term is approximately \$40.3 million.

Several of the RNG facilities selected through the Company’s RFP process have expected in-service dates later than what was initially assumed at the time the Company filed its initial plan. When selecting RNG projects for Pilot C, CenterPoint Energy prioritized the projects’ carbon intensity (“CI”) score and their geographic location over ensuring that their predicted in-service dates aligned precisely with initial NGIA plan assumptions. The Company’s objective was to maximize the impact of, and learnings from, Pilot C RNG projects. Additionally, some selected projects have experienced delays since their initial selection. Despite this, due to the quality of projects selected by the Company through its RFP process, if selected projects perform as

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<sup>17</sup> Value calculation can be found on the “5-Yr NGIA Budget” tab of Attachment 1.

<sup>18</sup> See May 16, 2025, *Order Approving Natural Gas Innovation Plan with Modifications* Docket No. G-002/M-23-518

<sup>19</sup> May 16, 2025, *Order Approving Natural Gas Innovation Plan with Modifications* Docket No. G-002/M-23-518, Order Paragraph 2

expected, Pilot C would meet or exceed the greenhouse gas (“GHG”) reduction estimates included in the Company’s approved NGIA Plan.

However, because the Company will be paying for, and receiving, RNG and its related environmental attributes later into the plan than initially assumed, Pilot C is projected to have a budget excess during the five-year plan period. It is these excess funds the Company now proposes to redistribute to Pilot D. Tables 2 and 3 below highlight Pilot C’s present and past budget assumptions, accounting for the changes in expected costs of procuring RNG<sup>20</sup>:

**Table 2: Pilot C Cost Estimates**

	<b>Initial Plan (\$ million)</b>	<b>Updated Estimate (\$ million)</b>	<b>Difference (\$ million)</b>
Total Incremental Costs Counting Against 5-year Budget <sup>21</sup>	40.3	33.2	-7.1
5-year NGIA Budget if Initial Budget Flexibility Request is Approved	40.3	39.8	-0.5
5-year NGIA Budget if Full Budget Flexibility Request is Approved	40.3	38.9	-1.4

**Table 3: RNG Contract Costs Counting Against the NGIA Budget by NGIA Plan Year**

	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5</b>
Assumed in Initial Plan (\$ million)	-	8.5	8.6	8.7	8.8
Updated Estimate (\$ million) <sup>22</sup>	-	2.9	8.0	9.2	7.4

<sup>20</sup> These changes are based on best estimates used in executed RNG contracts and reflect the contracts’ stated expectations for project timing and performance. These numbers may change based on project construction progress and actual performance of the projects.

<sup>21</sup> Total pilot incremental costs occurring within the 5-year NGIA plan period reflects all pilot costs (including RNG contract costs and other direct pilot costs such as costs to track and verify GHG reductions, other program and delivery costs), allocation of portfolio-level costs, and commodity cost savings through reduced purchases of geologic natural gas.

<sup>22</sup> CenterPoint Energy’s initial NGIA plan discussed project timelines and costs in terms of plan years, as it was not known at the time when, or if, the Company would receive a final Commission Order approving the plan. For simplicity, some project cost estimates – including those identified in the “Updated Estimate (\$ million)” row of Table 3 – have since shifted to instead reflect calendar years. In this instance, the costs displayed in “Year 2” for this row reflect estimated annual costs for 2026.

As noted above, while Order Point 26 of the Commission's October 9, 2024 Order Approving Natural Gas Innovation Plan with Modifications authorized the Company to exercise budget flexibility without prior Commission approval in specific circumstances, the Commission required that any budget increases exceeding 25 percent of a pilot's total five-year budget go through the annual review process or be filed for comment and approval in Docket No. 23-215.

Recognizing that the conditions established in Order Paragraph 26 of the Commission's October 9, 2024 Order highlights information the Commission may consider useful in considering requests to move budget between two pilots, the Company addresses each condition below with respect to its request to use Pilot C's excess budget to support Pilot D. Walking through this criteria illustrates the several reasons why the Company would be unable to exercise budget flexibility and must instead seek formal Commission approval.

- a) The proposed reallocation of Pilot C funds toward Pilot D would leave Pilot C's total budget for the duration of the five-year plan well above 75% of its initially approved budget. This condition does not represent a reason why the Company could not use budget flexibility as outlined in Order Paragraph 26.
- b) Should the Commission approve the Company's full budget flexibility request, Pilot D's budget would exceed 125% of its initially approved budget. Accordingly, the Company must seek Commission action to move forward with its request. Neither Pilot C nor Pilot D involve customer enrollment, and neither pilot is experiencing performance issues that could be resolved through other means.
- c) CenterPoint Energy will describe any use of budget flexibility in annual review filings and explain why the use of budget flexibility was warranted in each instance. Although the Company is required to bring this matter to the Commission for its consideration as opposed to exercising budget flexibility between two pilots without requiring Commission review and approval, the Company will nonetheless summarize this request in its next annual report.
- d) CenterPoint Energy acknowledges that Order Paragraph 26d prohibits the use of budget flexibility until the third year of the Company's NGIA plan. Accordingly, the Company cannot exercise budget flexibility between two pilots without additional Commission approval and must instead request Commission action to move forward with its request.
- e) The Company's request to move funding from Pilot C to Pilot D does leave insufficient funding to fund the full five-year approved budget of a pilot that is achieving plan expectations in terms of total lifecycle GHG emissions reductions at a cost equal to or less than estimated in the plan. Based on estimates for project performance and timelines used in executed RNG contracts, Pilot C is anticipated to perform at or above expectations in terms of total GHG emissions reductions at a cost equal to or less than estimated in the Plan. These projects are projected to have an expected average carbon intensity that is more favorable than assumed in the Company's NGIA Plan, and the Company expects to achieve the GHG emissions reductions estimated in the Plan for Pilot C during the five-year Plan term. Therefore, while the Company is proposing to move funding away from what is expected to be a successful pilot, it does not anticipate that this move will have negative consequences for Pilot C. This condition represents another reason why the Company cannot exercise budget flexibility without additional Commission approval and must instead request Commission action to move forward with its request.

- f) CenterPoint Energy will ensure the cost recovery mechanisms true up customer class allocations to match actual pilot spending. In this instance, the costs associated with both Pilots C and D are allocated to all customer classes.
- g) CenterPoint Energy's proposal shifts budgets between two alternative fuel pilots. This condition does not represent a reason why the Company could not use budget flexibility as outlined in Order Paragraph 26.
- h) Although the Company is not seeking to exercise budget flexibility without Commission approval, CenterPoint Energy did inform both the Department of Commerce and the Office of the Attorney General – Residential Utilities Division of this issue before making this filing.
- i) CenterPoint Energy's request does not result in the Company exceeding the approved five-year budget for its NGIA Plan. This condition does not represent a reason why the Company could not use budget flexibility as outlined in Order Paragraph 26.

#### **b. Moving Budget from R&D Reserve Funds**

As an alternative to moving funding from Pilot C to Pilot D, CenterPoint Energy proposes to leverage some of the roughly \$8.5 million in reserve R&D funding to supplement Pilot D. Outside of a planned R&D project that will explore small farm participation in RNG markets – which will be proposed as a part of the Company's second annual report with an estimated budget of between \$60,000 and \$200,000 – these reserve funds are currently not tied to any current or planned R&D projects. The Company's preferred option is to shift funding from Pilot C, as described above, but would find shifting R&D Reserve Funds to Pilot D to be an acceptable alternative if preferred by the Commission.

Although the Company is not seeking to exercise budget flexibility without Commission authorization according to the conditions laid out in Order Paragraph 26 of the Commission's October 9, 2024 Order, the Company provides the following information about this budget reallocation option in relation to the Conditions described in that Order Paragraph.

- a) The proposed reallocation of reserve R&D funds toward Pilot D does not impact the funding level of other approved pilot projects. This condition does not represent a reason why the Company could not use budget flexibility as outlined in Order Paragraph 26.
- b) Should the Commission approve the Company's full budget flexibility request, Pilot D's budget would exceed 125% of its initially approved budget. Accordingly, the Company must seek Commission action to move forward with its request. Pilot D does not involve customer enrollment and is not experiencing performance issues that could be resolved through other means.
- c) CenterPoint Energy will describe any use of budget flexibility in annual review filings and explain why the use of budget flexibility was warranted in each instance. Although the Company is required to bring this matter to the Commission for its consideration as opposed to exercising budget flexibility between two pilots without requiring Commission review and approval, the Company will nonetheless summarize this request in its next annual report.
- d) CenterPoint Energy acknowledges that Order Paragraph 26d prohibits the use of budget flexibility until the third year of the Company's NGIA plan. Accordingly, the Company cannot exercise budget flexibility between two pilots without additional Commission approval and must instead request Commission action to move forward with its request.

- e) The Company's request in this instance does not leave insufficient funding to fund the full five-year approved budget of any approved pilot that is achieving plan expectations in terms of total lifecycle greenhouse gas emissions reductions at a cost equal to or less than estimated in the plan. The reserve R&D funds are not tied to any one specific project at this time. Further, as noted in the Company's initial plan, the lifecycle GHG benefits of R&D projects are uncertain, difficult to quantify, or likely to be nominal despite learnings that could lead to future reductions. This condition does not represent a reason why the Company could not use budget flexibility as outlined in Order Paragraph 26
- f) CenterPoint Energy will ensure the cost recovery mechanisms true up customer class allocations to match actual pilot spending.
- g) This request would shift funding away from funding reserved for future, yet-to-be-proposed, R&D projects.
- h) Although the Company is not seeking to exercise budget flexibility without Commission approval, CenterPoint Energy did inform both the Department of Commerce and the Office of the Attorney General – Residential Utilities Division of this issue before making this filing.
- i) CenterPoint Energy's request does not result in the Company exceeding the approved five-year budget for its NGIA Plan. This condition does not represent a reason why the Company could not use budget flexibility as outlined in Order Paragraph 26.

## V. LIST OF RECOMMENDATIONS

In summary, CenterPoint requests the following:

1. Approve CenterPoint Energy's request to move funds from its RNG Request for Proposals Pilot's (Pilot C) five-year plan budget to supplement its Green Hydrogen Blending into Natural Gas Distribution System Pilot's (Pilot D) five-year plan budget. Approval allows CenterPoint Energy to move the following funds from Pilot C's five-year plan budget to Pilot D:
  - a. Initial Request: \$468,412
  - b. Contingency Request: \$935,972
  - c. Full Request [lines a + b]: \$1,404,384

Alternatively:

2. Approve CenterPoint Energy's request to move funds from its R&D reserve budget to supplement its Green Hydrogen Blending into Natural Gas Distribution System Pilot's (Pilot D) five-year plan budget. Approval allows CenterPoint Energy to move the following funds from the Company's R&D reserve budget to the five-year plan budget of Pilot D:
  - a. Initial Request: \$468,412
  - b. Contingency Request: \$935,972
  - c. Full Request [lines a + b]: \$1,404,384

Regardless of the outcome, the Company commits to ensuring that any on-going costs associated with its innovation plan pilots are included within the budget of subsequent innovation plans, to ensure such costs are being monitored appropriately.

To allow enough time for the Company to take actions necessary to secure all applicable IRA tax credits, the Company respectfully requests Commission action on this request by June 4, 2026.

## **VI. CONCLUSION**

CenterPoint Energy thanks the Commission for consideration of request.

## CERTIFICATE OF SERVICE

I, Christina Benning, certify that on Thursday, January 22, 2026, I served the attached Compliance Filing of CenterPoint Energy in Docket No. G-008/M-23-215 to all persons at the addresses indicated on the attached service list by having the document delivered via electronic filing.

/s/ Christina Benning  
Senior Regulatory Paralegal  
CenterPoint Energy

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	23-215Official
2	Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource		15669 WATERLOO CIR TRUCKEE CA, 96161 United States	Electronic Service		No	23-215Official
3	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	23-215Official
4	Abby	Alter	aalter@rmi.org			2490 Junction Place Ste 200 Boulder CO, 80301 United States	Electronic Service		No	23-215Official
5	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	23-215Official
6	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official
7	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	23-215Official
8	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
9	Michael J	Auger	michael.auger@ever-greenenergy.com	Ever-Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	23-215Official
10	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	23-215Official
11	Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	23-215Official
12	Randall	Beck	rbeck3@wm.com	Waste Management Renewable Energy, L.L.C.		1021 Main St Houston TX, 77002 United States	Electronic Service		No	23-215Official
13	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	23-215Official
14	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	23-215Official
15	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
16	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	23-215Official
17	Sherri	Billimoria	sbillimoria@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-215Official
18	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
19	Tim	Brinkman	tim.brinkman@gvtel.com	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	23-215Official
20	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-215Official
21	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	23-215Official
22	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	23-215Official
23	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	23-215Official
24	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	23-215Official
25	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
26	Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org			Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul MN, 55102 United States	Electronic Service		No	23-215Official
27	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official
28	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	23-215Official
29	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
30	Sheri	Comer	sheri.comer@fr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	23-215Official
31	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	23-215Official
32	Jean	Comstock	jean.comstock.dbcc@gmail.com		St. Paul 350	729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	23-215Official
33	George	Crocker	gwillc@nawo.org		North American Water Office	5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-215Official
34	Joseph	Dammel	dammel@fresh-energy.org		Fresh Energy	408 Saint Peter St Ste 350 St. Paul MN, 55102 United States	Electronic Service		No	23-215Official
35	Seth	DeMerritt	seth.demerritt@centerpointenergy.com		CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
36	James	Denniston	james.r.denniston@xcelenergy.com		Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
37	Ryan	Dougherty	ryan@geoexchange.org		Geothermal Exchange Organization	312 S 4th St Ste 100 SPRINGFIELD IL, 62701 United States	Electronic Service		No	23-215Official
38	J.	Drake Hamilton	hamilton@fresh-energy.org		Fresh Energy	408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	23-215Official
39	Brian	Edstrom	briane@cubminnesota.org		Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-215Official
40	John	Farrell	jfarrell@ilsr.org		Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	23-215Official
41	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	23-215Official
42	Mike	Fiterman	mikefiterman@libertydiversified.com		Liberty Diversified International	5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	23-215Official
43	Lucas	Franco	lfranco@liunagroc.com		LIUNA	81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
44	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	23-215Official
45	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	23-215Official
46	Debbie	Goettel	debbie.goettel@hennepin.us	Partnership on Waste and Energy		2785 White Bear Ave N Ste 350 Maplewood MN, 55109 United States	Electronic Service		No	23-215Official
47	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	23-215Official
48	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
49	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-215Official
50	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	23-215Official
51	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-215Official
52	Mike	Henchen	mhenchen@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-215Official
53	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	23-215Official
54	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	23-215Official
55	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	23-215Official
56	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-215Official
57	Emma	Ingebretson	emma.ingebretsen@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall PO Box 59038 Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
58	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas		400 N 4th St Bismarck ND,	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Company		58501 United States				
59	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	23-215Official
60	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23-215Official
61	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
62	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
63	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	23-215Official
64	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	23-215Official
65	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	23-215Official
66	D	Kalmon	dkalmon@mwmw.org	Mississippi Watershed Management Organization		2522 Marshall St NE Minneapolis MN, 55418-3329 United States	Electronic Service		No	23-215Official
67	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23-215Official
68	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
69	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	23-215Official
70	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
71	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
72	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	23-215Official
73	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
74	Betsy	Lang	betsy.lang@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Ave Mall, 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
75	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-215Official
76	Samuel	Lehr	sam.lehr@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L St #513 Sacramento CA, 95814 United States	Electronic Service		No	23-215Official
77	Robert	Lems	administration@dmr-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	23-215Official
78	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-215Official
79	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-215Official
80	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-215Official
81	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	23-215Official
82	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
83	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-215Official
84	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
85	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
86	Nicholas	Martin	nicholas.f.martin@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th floor Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
87	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	23-215Official
88	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
89	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	23-215Official
90	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-215Official
91	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	23-215Official
92	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	23-215Official
93	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	23-215Official
94	Ana Sophia	Mifsud	amifsud@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-215Official
95	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-215Official
96	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
97	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	23-215Official
98	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-215Official
99	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
100	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
101	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	23-215Official
102	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
103	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-215Official
104	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	23-215Official
105	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-215Official
106	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official
107	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	23-215Official
108	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	23-215Official
109	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	23-215Official
110	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
111	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	23-215Official
112	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-215Official
113	Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-215Official
114	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						St. Paul MN, 55102 United States				
115	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	23-215Official
116	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	23-215Official
117	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-215Official
118	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	23-215Official
119	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	23-215Official
120	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
121	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	23-215Official
122	Rebecca	Schultz	rebecca.schultz@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
123	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-215Official
124	Patrick	Serfass	policy@americanbiogascouncil.org	American Biogas Council		1126 I Street SE Washington DC, 20003 United States	Electronic Service		No	23-215Official
125	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	23-215Official
126	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	23-215Official
127	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
128	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	23-215Official
129	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-215Official
130	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-215Official
131	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-215Official
132	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-215Official
133	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-215Official
134	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
135	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
136	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
137	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	23-215Official
138	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
139	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	23-215Official
140	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
141	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	23-215Official
142	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						FL, 33408 United States				
143	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L Street #513 Sacramento CA, 95814 United States	Electronic Service		No	23-215Official
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152	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official