

May 15, 2024

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 East Seventh Place, Suite 350  
Saint Paul, MN 55101-2147

RE: Docket No. 23-215: In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan

Dear Mr. Seuffert:

The City of Minneapolis (“Minneapolis”) submits these Supplemental Comments regarding the CenterPoint Energy Petition for Approval of its Natural Gas Innovation Plan (“Plan”) filed June 28, 2023.<sup>1</sup> Minneapolis appreciates the thoughtful Comments and Reply submitted by the Company and other parties. After reviewing the record to date, we provide updates to our Initial Comments.

**I. Minneapolis recommends approval with Modifications**

Minneapolis continues to recommend approval of the Plan with modifications. Our positions remain the same from our Initial Comments except as described in section III.

**II. CenterPoint’s Concerns and Recommendations Regarding the City of Minneapolis’ Analysis**

CenterPoint noted that Minneapolis prioritized four objectives in our analysis, including greenhouse gas reductions, cost-effectiveness, improving affordability, and health and equity.<sup>2</sup>

Specifically, we stated in Initial Comments:

*When evaluating the NGIA Plan, our initial analysis focuses on whether a pilot:*

- *Demonstrates the potential to lead to significant progress in reducing the climate impacts of CenterPoint operations in Minnesota in the near- to medium-term, consistent with the statutory goal to reduce economy-wide GHG emissions to net zero by 2050 as compared to 2005 levels with interim targets of:*
  - o 30 percent by 2025 and
  - o 50 percent by 2030

---

<sup>1</sup> Docket No. E002/CN-23-215. Petition by CenterPoint Energy for Approval of its First Natural Gas Innovation Plan. Jun 28, 2023.

<sup>2</sup> CenterPoint Energy Reply Comments. Mar. 15, 2024. p. 5.

- Holds promise to be cost-effective (i.e. at scale, costs are in-line with the program benefits)
- Will positively impact comfort and affordability for customers
- Is likely improve health and equity for CenterPoint customers<sup>3</sup>

The Company acknowledged these are important considerations but recommended “the Commission should focus on the statutorily-specified criteria and the frameworks approved in the Commission’s June 1, 2022 Order in Docket No. G-999/CI-21-56615 in evaluating the Company’s Plan.”<sup>4</sup>

While affordability along with health and equity are general priorities associated with utility regulation, state greenhouse gas (“GHG”) reduction goals and guidance about cost-effectiveness are taken directly from the NGIA statute:<sup>5</sup>

*(b) The commission must approve, modify, or reject a plan. The commission must not approve an innovation plan unless the commission finds:*

*(7) the total amount of estimated greenhouse gas emissions reduction or avoidance to be achieved under the plan is reasonable considering the state's greenhouse gas and renewable energy goals, including those established in section [216C.05, subdivision 2](#), clause (3), and section [216H.02, subdivision 1](#); customer cost and the total amount of greenhouse gas emissions reduction or avoidance achieved under the utility's previously approved plans, if applicable*

And Order Point 38<sup>6</sup> requires utilities to consider all four of these public interest priorities:

*Utility innovation plan filings shall include:*

- a. An assessment of impacts on local communities in and around proposed project sites and a summary of outreach/community workshops held for pilots designed to reach low- and medium-income customers;*<sup>7</sup>
- b. A discussion of expectations for program access and types of customers that may participate;*
- c. A discussion of how equity and diversity was or will be considered in the program design process and any utility vendor/supplier selection processes;*
- d. The most recent metrics filed under the Commission’s January 7, 2020, Order of Service Quality Reports in Dockets No. G-004/M-19-280, G-008/M-19-300, G-011/M-19-303, G-002/M-19-304, and G-002/M-19-305; and*
- e. A nontechnical summary describing how the innovation furthers the state’s*

<sup>3</sup> City Comments. Jan. 16, 2024. p. 1-2.

<sup>4</sup> CenterPoint Reply Comments. March 15, 2024. p. 5.

<sup>5</sup> Minn. Stat. § 216B.2427 Subd.2 (a) and (b)

<sup>6</sup> Docket No. G-999/CI-21-566. *Order Establishing Frameworks to Compare Lifecycle Greenhouse Gas Emission Intensities of Various Resources, and to Measure Cost Effectiveness of Individual Resources and of Overall Innovation Plans.* June 1, 2022. p. 21.

<sup>7</sup> Consideration of health impacts is inferred in 38a.

*greenhouse gas emissions reduction and renewable energy goals, the process and analytical techniques used to create the plan, percentage greenhouse gas emission reductions through the plan, all projects proposed and considered by the utility ranked in order of cost per ton of avoided greenhouse gas emissions, costs and activities required over the next five years to implement the plan, the likely effect of plan implementation on gas rates and bills, and local economic development and future innovation associated with the plan.*

In addition to Order Point 38, the Commission Order requires analysis, metrics, and reporting for an NGIA plan related to GHG emissions and intensity; cost effectiveness; and affordability.<sup>8</sup>

In summary, Minneapolis views our analysis as consistent with both statute and the Commission's Order governing the development of NGIA Plans. We are supportive of most of the pilots within the proposed Plan and understand that some measures that are not cost effective today may warrant piloting within the overall plan if they hold promise to reduce GHG intensity of the Company's heating system at scale.

### **III. Updated Positions in Response Other Parties' Comments**

#### **A. Pilot A Budget Reallocation to Pilot C.**

After Hennepin County withdrew plans to pursue anaerobic digestion, the Company proposed to reallocate the funds intended for Pilot A to Pilot C for a general Renewable Natural Gas Request for Proposal.<sup>9</sup> Minneapolis shares the concern raised by CUB that the Company relies on Pilot C to achieve a spending level that meets the 50 percent requirement in statute for the overall Plan.<sup>10</sup> We agree with the Clean Energy Organizations ("CEOs") that the Company has not demonstrated that the lifetime budget of \$67 Million for Pilot C is reasonable.<sup>11</sup>

Minneapolis agrees that a more reasonable approach would be for the Commission to approve a modified plan that eliminates or lowers the approved costs for some pilots so that the 50 percent requirement is met at a lower, overall budgeted cost for the full NGIA Plan.<sup>12</sup>

#### **B. Pilot N Residential Deep Energy Retrofits and Electric Air Source Heat Pumps**

Minneapolis agrees with the recommendation from the CEOs in Reply Comments:

*We...recommend that Pilot N not be limited to hybrid heating systems and that it prioritizes investments in electric heating equipment rather than the installation of new gas backup equipment in hybrid heating systems.<sup>13</sup>*

---

<sup>8</sup> Order Points 26, 27, 29, 30, 31, 33, 35, and 36 and others from Docket No. G-999/CI-21-566.

<sup>9</sup> Docket No. G-008/M-23-215 CenterPoint Energy REPLY COMMENTS In the Matter of the Company's First Natural Gas Innovation Act ("NGIA") Innovation Plan. March 15, 2024. p.35.

<https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={60DF438E-0000-C87F-90F2-20D024BD3E85}&documentTitle=20243-204399-04>

<sup>10</sup> Citizens Utility Board Reply Comments. March 15, 2024. p. 6.

<sup>11</sup> Clean Energy Organizations Initial Comments. Jan. 16, 2024. p. 22-24.

<sup>12</sup> *Id.* p. 5.

<sup>13</sup> CEOs Reply Comments. March 15, 2024. p.3

### **C. CenterPoint's Request to Spend Up to 25 Percent More Than Budgeted**

Minneapolis took the position in Initial Comments that budget variances of up to five percent may be warranted for pilots with higher-than-expected expenditures without seeking additional approval from the Commission.<sup>14</sup> In reviewing the comments of other parties, including concerns that the request does not comply with the text of the statute,<sup>15</sup> we support the recommendation that adjustments to pilot budgets should be pursued and evaluated through the modification process already established by the NGIA statute.<sup>16</sup>

### **IV. Conclusion**

Minneapolis appreciates the significant work that has gone into the development of the Evaluation Framework, CenterPoint's Proposal, and the efforts of various parties. We thank the Commission for consideration of our Supplemental Comments.

Respectfully submitted,



Kim W. Havey (He/Him)  
Division Director  
Sustainability, Healthy Homes, and the Environment

---

<sup>14</sup> Minneapolis Comments. Jan 16, 2024. p. 9.

<sup>15</sup> Office of the Attorney General Comments. Jan. 12, 2024. p. 9-10.

<sup>16</sup> Citizens Utility Board Comments. Jan. 15, 2024. p.11

STATE OF MINNESOTA )

) ss. **CERTIFICATE OF SERVICE**

COUNTY OF HENNEPIN )

I, Stacy A. Miller, of the City of Minneapolis, County of Hennepin, State of Minnesota, affirm that on the 15th day of May 2024, I served a copy of the following via e-mail and/or via U.S. Mail:

**SUPPLEMENTAL COMMENTS OF THE CITY OF MINNEAPOLIS REGARDING DOCKET NO. 23-215**

at the last known mailing addresses and email addresses of said entities/individuals on the attached Service List. If by U.S. Mail, I placed said document in postage prepaid envelope and placed same in the U.S. Post Office in Minneapolis, Minnesota for delivery by the United States Postal Service.



---

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No
Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource	15669 WATERLOO CIR TRUCKEE, CA 96161	Electronic Service	No
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, MN 55405	Electronic Service	No
Abigail	Alter	aalter@rmi.org		2490 Junction Place Ste 200 Boulder, CO 80301	Electronic Service	No
Gary	Ambach	Gambach@slipstreaminc.org	Slipstream, Inc.	8973 SW Village Loop Chanhassen, MN 55317	Electronic Service	No
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No
Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato	P.O. Box 3368 Mankato, MN 560023368	Electronic Service	No
Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No
Michael J	Auger	Michael.auger@ever-greenenergy.com	Ever-Green Energy	305 Saint Peter St Saint Paul, MN 55102	Electronic Service	No
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No
Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP	396 Hayes Street San Francisco, CA 94102	Electronic Service	No
Randall	Beck	RBeck3@wm.com	Waste Management Renewable Energy, L.L.C.	1021 Main St Houston, TX 77002	Electronic Service	No
David	Bender	dbender@earthjustice.org	Earthjustice	1001 G Street NW Suite 1000 Washington, DC 20001	Electronic Service	No
Alicia	Berger	Alicia.E.Berger@xcelenergy.com	Xcel Energy	414 Nicollet Mall	Electronic Service	No

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
				Minneapolis, MN 55401		
Tracy	Bertram	tbertram@ci.becker.mn.us		12060 Sherburne Ave Becker City Hall Becker, MN 55308-4694	Electronic Service	No
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No
Sherri	Billimoria	sbillimoria@rmi.org	Rocky Mountain Institute (RMI)	N/A	Electronic Service	No
Mike	Boughner	Michael.l.boughner@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No
Tim	Brinkman	tim.brinkman@gvtel.net	Garden Valley Telephone Company - Coop	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No
Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.	180 South Clinton Avenue Rochester, NY 14646	Electronic Service	No
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No
Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy	10 2nd St NE Ste. 400 Minneapolis, MN 55413	Electronic Service	No
Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No
Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org		Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul, MN 55102	Electronic Service	No
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.	Electronic Service	No

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
				St, Louis, MO 63119-2044		
Sheri	Comer	Sheri.comer@ftr.com	Frontier Communications Corporation	1500 MacCorkle Ave SE Charleston, WV 25396	Electronic Service	No
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes
Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350	729 6th St E St. Paul, MN 55106	Electronic Service	No
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No
Joseph	Dammel	dammel@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 350 St. Paul, MN 55102	Electronic Service	No
Seth	DeMerritt	Seth.DeMerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No
Ryan	Dougherty	ryan@geoexchange.org	Geothermal Exchange Organization	312 S 4th St Ste 100 SPRINGFIELD, IL 62701	Electronic Service	No
J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Ste 350 Saint Paul, MN 55101	Electronic Service	No
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No
Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International	5600 N Highway 169 Minneapolis,	Electronic Service	No



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
				MN 55428-3096		
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No
Amy	Fredregill	afredregill@environmental-initiative.org	Environmental Initiative, MN Sustainable Growth Coalition	211 First St N Ste 250 Minneapolis, MN 55401	Electronic Service	No
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No
BEAU	GRIFFEY	bgriffey@id8energy.com	iD8 Energy Group, LLC	1799 County Rd 90 N Maple Plain, MN 55395	Electronic Service	No
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No
Debbie	Goettel	Debbie.Goettel@hennepin.us	Partnership on Waste and Energy	2785 White Bear Ave N Ste 350 Maplewood, MN 55109	Electronic Service	No
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No
Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.	570 Colonial Park Drive Suite 305 Roswell, GA 30075-3770	Electronic Service	No
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No
Mike	Henchen	mhenchen@rmi.org	Rocky Mountain Institute (RMI)	N/A	Electronic Service	No
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230	Electronic Service	No

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
				St.Paul, MN 55101		
Joylyn C	Hoffman Malueg	Joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources	2685 145th St W Rosemount, MN 55068	Electronic Service	No
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No
Emma	Ingebretson	Emma.Ingebretsen@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55402	Electronic Service	Yes
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No
John	Jaimez	john.jaimez@hennepin.us	Hennepin County Public Works	Environment & Energy Department 701 4th Ave S Minneapolis, MN 55415	Electronic Service	No
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No
Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN	2801 21st Ave S Ste 220 Minneapolis, MN 55407	Electronic Service	No
Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC	4710 Blaylock Way Inver Grove Heights, MN 55076	Electronic Service	No
David	Kailbourne	EDK@REVLNG.COM	REV LNG, LLC	1002 Empson Rd Ulysses, PA 16948	Electronic Service	No
D	Kalmon	dkalmon@mwm.org	Mississippi Watershed Management Organization	2522 Marshall St NE Minneapolis, MN 55418-3329	Electronic Service	No
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No
Frank	Kohlasch	frank.kohlasch@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N. St. Paul, MN 55155	Electronic Service	No
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No
Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce	401 N Robert Street Suite 150 St Paul, MN 55101	Electronic Service	No
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No
Betsy	Lang	betsy.lang@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Ave Mall, 3rd Floor Minneapolis, MN 55402	Electronic Service	Yes
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No
Samuel	Lehr	sam.lehr@rngcoalition.com	Coalition for Renewable Natural Gas	1017 L St #513 Sacramento, CA 95814	Electronic Service	No
Robert	Lems	administration@dmr-cgs.com	DMT Clear Gas Solutions	19125 SW 125th Ct Tualatin, OR 97062	Electronic Service	No
Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello	505 Walnut St Ste 1 Monticello, MN 55362	Electronic Service	No
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No
Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No
Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	Yes
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No
Emily	Marshall	emarshall@mojlaw.com	Miller O'Brien Jensen, PA	120 S. 6th Street Suite 2400 Minneapolis, MN 55402	Electronic Service	No
Nicholas	Martin	nicholas.f.martin@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th floor Minneapolis, MN 55401	Electronic Service	No
Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute	N/A	Electronic Service	No
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No
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
Taylor	McNair	taylor@gridlab.org		668 Capp Street San Francisco, CA 94110	Electronic Service	No
Sarah	Mead	sarah.mead@wecenergygroup.com	MERC	N/A	Electronic Service	No
Matthew	Melewski	matthew@nokomisenergy.com	Nokomis Energy LLC & Ole Solar LLC	2639 Nicollet Ave Ste 200 Minneapolis, MN 55408	Electronic Service	No
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No
Ana Sophia	Mifsud	amifsud@rmi.org	Rocky Mountain Institute (RMI)	N/A	Electronic Service	No
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301	Electronic Service	No

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
				Minneapolis, MN 55415		
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No
Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55101	Electronic Service	No
Alan	Muller	alan@greendel.org	Energy & Environmental Consulting	1110 West Avenue Red Wing, MN 55066	Electronic Service	No
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No
M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400 Minneapolis, MN 55402	Electronic Service	No
Ric	O'Connell	ric@gridlab.org	GridLab	2120 University Ave Berkeley, CA 94704	Electronic Service	No
Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association	2288 University Ave W St. Paul, MN 55114	Electronic Service	No
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC	3330 Washington Blvd Ste 400 Arlington, VA 22201	Electronic Service	No
Melissa	Partin	mpartin@mncenter.org	Minnesota Center for Environmental Advocacy	1943 Princeton Ave St Paul, MN 55105	Electronic Service	No
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No
Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company	PO Box 496 215 S. Cascade St. Fergus Falls, MN 565370496	Electronic Service	No
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No
J. Gregory	Porter	greg.porter@nngco.com	Northern Natural Gas Company	1111 South 103rd St Omaha, NE 68124	Electronic Service	No
Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, MN 55117	Electronic Service	No
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No
Victoria	Reinhardt	Victoria.Reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy	Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul, MN 55102	Electronic Service	No
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No
Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth	500 East Grant Street 1207 #1207 Minneapolis, MN 55404	Electronic Service	No
Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications	2378 Wilshire Blvd. Mound, MN 55364	Electronic Service	No
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No
Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center	8421 Wayzata Blvd Ste 300 Golden Valley, MN 55426	Electronic Service	No
Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council	1211 Connecticut Ave NW Ste 650 Washington, DC 20036	Electronic Service	No
Patrick	Serfass	pserfass@ttcorp.com	American Biogas Council	1211 Connecticut Ave NW Ste 650 Washington, DC 20036	Electronic Service	No
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No
David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions	2303 Wycliff St Ste 300 St. Paul, MN 55114	Electronic Service	No
Andrew R.	Shedlock	Andrew.Shedlock@KutakRock.com	Kutak Rock LLP	60 South Sixth St Ste 3400 Minneapolis,	Electronic Service	No

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
				MN 55402-4018		
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No
Edyta	Sitko	esitko@ucsusa.org	Union of Concerned Scientists	1 N Lasalle Ave CHICAGO, IL 60602	Electronic Service	No
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, CA 94105	Electronic Service	No
Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth	1961 Premier Dr Ste 100 Mankato, MN 56001	Electronic Service	No
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No
Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No
Mark	Spurr	mspur@fvbenergy.com	International District Energy Association	222 South Ninth St., Suite 825 Minneapolis, MN 55402	Electronic Service	No
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No
Kent	Sulem	ksulem@mmua.org	MMUA	3131 Fernbrook Ln N Ste 200 Plymouth,	Electronic Service	No



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
				MN 55447-5337		
Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No
Matthew	Tomich	tomich@energy-vision.org	Energy Vision	138 E 13th St New York, NY 10003	Electronic Service	No
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No
Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC	700 Universe Blvd Juno Beach, FL 33408	Electronic Service	No
Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas	1017 L Street #513 Sacramento, CA 95814	Electronic Service	No
Nicole	Westling	nicole.westling@state.mn.us	Department of Commerce	85 7th Place E Suite 280 St Paul, MN 55001	Electronic Service	No
Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group	605 Highway 169 N Ste 1200 Plymouth, MN 55441	Electronic Service	No
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No
Tim	Wulling	t.wulling@earthlink.net		1495 Raymond Ave. Saint Paul, MN 55108	Electronic Service	No
Donald	Wynia	donald.wynia@centerpointenergy.com	CenterPoint Energy	CenterPoint Energy 505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No
Grant	Zimmerman	GZIMMERMAN@AMPAMERICAS.COM	Amp Americas	811 W Evergreen Ave Ste 201 Chicago, IL 60642	Electronic Service	No

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No