



Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
www.minnesotaenergyresources.com

December 15, 2025

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

VIA ELECTRONIC FILING

**Re: In the Matter of the Minnesota Technical Reference Manual Version 5.0
Docket No. E,G999/CIP-18-694**

Reply Comments of Minnesota Energy Resources Corporation

Dear Dr. Lieb:

On October 29, 2025, the Minnesota Department of Commerce, Division of Energy Resources (“Department”), issued a notice of filing of a Proposed Decision on the Technical Reference Manual Version 5.0 (“TRM”), in the above-referenced docket. On November 20, 2025, CenterPoint Energy, Connexus Energy, Dakota Electric Association, Great River Energy, Minnesota Energy Resources Corporation (“MERC” or the “Company”), Minnesota Municipal Utilities Association, Minnesota Power Company, Xcel Energy, and Otter Tail Power Company (collectively, “the Utilities”) provided joint comments expressing concerns about the Technical Reference Manual Advisory Committee (“TRMAC”) process and the approach taken to propose changes to the residential furnace baseline in the *Draft TRM v.5.0*. MERC, as well as CenterPoint Energy, Otter Tail Power Company, and Xcel Energy, also submitted individual comments on the Proposed Decision. Additionally, Center for Energy and Environment (“CEE”) and Fresh Energy submitted comments on the proposed increase to the baseline efficiency for single-family residential furnaces from 80 to 90% Annual Fuel Utilization Efficiency (“AFUE”). MERC respectfully submits these Reply Comments in response to the Utilities’ and CEE’s initial comments.

MERC reiterates the concerns raised in our November 20 Comments and in the Joint Utility Comments regarding the proposed furnace baseline increase, which bypassed the TRMAC stakeholder feedback and technical review process. As detailed in those initial comments, MERC is concerned about the precedent this establishes for future Energy Conservation and Optimization (“ECO”) regulatory proceedings. Additionally, MERC is concerned about the potential unintended consequences of the proposal to low-income customers, who most benefit from the availability of rebates for high-efficiency natural gas equipment.

In reference to CEE's citation of Home Energy Squad ("HES") visits to inform the 90% AFUE baseline change, MERC is concerned with the applicability of this data to MERC's customer base, which was obtained by CenterPoint Energy and Xcel Energy HES visits primarily in more urban areas. As CEE noted in their comments, the HES data disproportionately represents Hennepin and Ramsey Counties.¹ This geographic distribution is not representative of MERC's service areas and may overstate furnace baseline efficiencies in MERC's territory and rural areas. Additionally, as CEE note in their Comments, the homes represented in the HES data chose to undergo an HES visit, which could imply that the households are more energy-conscious and willing to install a high efficiency furnace.²

Should the 90% AFUE single-family residential furnace baseline be approved, MERC will explore alternative approaches that more accurately reflect furnace baselines for participants in MERC's ECO programs. These alternatives may include CEE's recommendation #2 to apply the federal minimum 80% AFUE standard as the measure baseline in cases where MERC can verify the actual efficiency of the existing furnace, and the existing furnace AFUE is lower than 90%.³ This approach would allow MERC to continue prioritizing and offering higher customer rebates for the replacement of lower efficiency, non-condensing furnaces. It also would accurately reflect the baseline for these customers since a customer replacing a non-condensing furnace would likely not choose a condensing furnace without a market intervention.

Additionally, if the 90% AFUE baseline is adopted in the TRM, the Department could also consider CEE's recommendation #3 to implement a low-income-specific furnace baseline, as evidence suggests that low-income households are more likely to have a furnace with an efficiency rating lower than 90% AFUE.⁴

MERC reaffirms our initial comments regarding the process, technical issues, and customer impacts of the Proposed Decision and supports the comments filed by CenterPoint Energy, Otter Tail Power Company, and Xcel Energy related to the increase to the residential single-family furnace baseline. MERC recommends that the furnace baseline remain at 80% in TRM 5.0 and that the proposed residential furnace baseline update be further evaluated through the TRMAC process before being considered for inclusion in the Minnesota TRM.

¹ *In the Matter of Minnesota Technical Reference Manual Version 5.0*, Docket E,G999/CIP-18-694, Center for Energy and Environment Comments at 9 (Nov. 20, 2025).

² *Id.*

³ *Id.* at 19.

⁴ *Id.*

Docket No. E,G999/CIP-18-694

December 15, 2025

Page 3

Please contact me at (651) 322-8917 or jennifer.kimmen@wecenergygroup.com if you have any questions regarding these Comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer A. Kimmen".

Jennifer Kimmen
Senior Customer Program
Manager
WEC Business Services, Inc.

cc: Service Lists

In the Matter of the Minnesota Technical
Reference Manual Version 5.0

Docket No. E,G999/CIP-18-694

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 15th day of December, 2025, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed Reply Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service lists.

Dated this 15th day of December, 2025.

/s/ Kristin M. Stastny

Kristin M. Stastny

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Tasha	Altmann	tasha.altmann@mrenergy.com	Missouri River Energy Services		3724 W. Avera Drive PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	18-694CIP-18-694
2	Julie	Ambach	juliea@cmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	18-694CIP-18-694
3	Kathy	Baerlocher	kathy.baerlocher@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	18-694CIP-18-694
4	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	18-694CIP-18-694
5	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	18-694CIP-18-694
6	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	18-694CIP-18-694
7	Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	18-694CIP-18-694
8	Deb	Birgen	dbirgen@mrenergy.com	Missouri River Energy Services		PO Box 88920 Sioux Falls MN, 57109 United States	Electronic Service		No	18-694CIP-18-694
9	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	18-694CIP-18-694
10	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	18-694CIP-18-694
11	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	18-694CIP-18-694
12	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	18-694CIP-18-694
13	Ray	Choquette	rchoquette@agp.com	Ag Processing		12700 West Dodge Road	Electronic Service		No	18-694CIP-

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Inc.		PO Box 2047 Omaha NE, 68103-2047 United States				18-694
14	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	18-694CIP-18-694
15	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	18-694CIP-18-694
16	Bradley	Davison	bradley.davison@mdu.com	Great Plains Natural Gas Company			Electronic Service		No	18-694CIP-18-694
17	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	18-694CIP-18-694
18	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	18-694CIP-18-694
19	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	18-694CIP-18-694
20	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	18-694CIP-18-694
21	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	18-694CIP-18-694
22	Lisa	Fischer	lisa.fischer@mrenergy.com	Missouri River Energy Services		PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	18-694CIP-18-694
23	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	18-694CIP-18-694
24	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	18-694CIP-18-694
25	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	18-694CIP-18-694
26	Jason	Grenier	jgrenier@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	18-694CIP-18-694

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
27	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	18-694CIP-18-694
28	Curtis	Hanson	chanson@franklinenergy.com	Franklin Energy		2303 Wycliff Street, Suite 2E St. Paul MN, 55114 United States	Electronic Service		No	18-694CIP-18-694
29	Kurt	Hauser	kurt.hauser@mrenergy.com	Missouri River Eenergy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	18-694CIP-18-694
30	Joe	Hoffman	ja.hoffman@smpma.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	18-694CIP-18-694
31	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	18-694CIP-18-694
32	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	18-694CIP-18-694
33	Jennifer	Kimmen	jennifer.kimmen@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		2685 145th St W Rosemount MN, 55033 United States	Electronic Service		No	18-694CIP-18-694
34	Zach	Klabo	zach.klabo@mdu.com	Great Plains Natural Gas Company			Electronic Service		No	18-694CIP-18-694
35	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	18-694CIP-18-694
36	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	18-694CIP-18-694
37	Dean	Laube	deanlaube@franklinenergy.com	Franklin Energy Services		2215 East Clairemont Avenue Eau Claire WI, 54701 United States	Electronic Service		No	18-694CIP-18-694
38	Martin	Lepak	martin.lepak@aeoa.org	Arrowhead Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	18-694CIP-18-694
39	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	18-694CIP-18-694
40	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester	Electronic Service		No	18-694CIP-18-694

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55906 United States				
41	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	18-694CIP-18-694
42	David C.	McLaughlin	david.fhmab@midconetwork.com	Missouri River Energy Services		25 NW 2nd St Ste 102 Ortonville MN, 56278 United States	Electronic Service		No	18-694CIP-18-694
43	Tim	Miller	tim.miller@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	18-694CIP-18-694
44	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	18-694CIP-18-694
45	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	18-694CIP-18-694
46	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	18-694CIP-18-694
47	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	18-694CIP-18-694
48	Larry	Oswald	larry.oswald@mdu.com	Great Plains Natural Gas Company		105 W Lincoln Ave PO Box 176 Fergus Falls MN, 56538-9001 United States	Electronic Service		No	18-694CIP-18-694
49	Leah	Peterson	lpeterson@mnpower.com	Minnesota Power		30 West Superior St Duluth MN, 55802 United States	Electronic Service		No	18-694CIP-18-694
50	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	18-694CIP-18-694
51	Joe	Plummer	jplummer@franklinenergy.com	Franklin Energy Services, LLC		2303 Wycliff St Suite 2E St. Paul MN, 55114 United States	Electronic Service		No	18-694CIP-18-694
52	Bill	Popert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	18-694CIP-18-694
53	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric		4300 220th St W	Electronic Service		No	18-694CIP-

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Association		Farmington MN, 55024-9583 United States				18-694
54	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445	Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	18-694CIP-18-694
55	Anne	Rittgers	arittgers@mnpower.com	Minnesota Power	30 W Superior St	Duluth MN, 55802 United States	Electronic Service		No	18-694CIP-18-694
56	Merlin	Sawyer	merlin.sawyer@mrenergy.com	Missouri River Energy Services	3724 W AVERA DR PO BOX 88920	Sioux Falls SD, 57109-8920 United States	Electronic Service		No	18-694CIP-18-694
57	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave	Bismarck ND, 58501 United States	Electronic Service		No	18-694CIP-18-694
58	Ben	Schoenbauer	bschoenbauer@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560	Minneapolis MN, 55401 United States	Electronic Service		No	18-694CIP-18-694
59	Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920	Sioux Falls SD, 57109-8920 United States	Electronic Service		No	18-694CIP-18-694
60	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin	1000 Clark Ave, St. Louis MO, 63102	United States	Electronic Service		No	18-694CIP-18-694
61	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd	St. Paul MN, 55102 United States	Electronic Service		No	18-694CIP-18-694
62	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692	Canton NY, 13617 United States	Electronic Service		No	18-694CIP-18-694
63	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390	Saint Paul MN, 55102 United States	Electronic Service		No	18-694CIP-18-694
64	Analeisha	Vang	avang@mnpower.com		30 W Superior St	Duluth MN, 55802-2093 United States	Electronic Service		No	18-694CIP-18-694
65	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200	Minneapolis	Electronic Service		No	18-694CIP-18-694

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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmpa.org	Shakopee Public Utilities		255 Sarasin St Shakopee MN, 55379 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
2	Kathy	Baerlocher	kathy.baerlocher@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
3	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
4	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
5	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	ECO SPECIAL SERVICE LIST
6	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
7	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
8	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
9	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	ECO SPECIAL SERVICE LIST
10	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST

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

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

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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
47	Laura	Silver	laura.silver@state.mn.us	Department of Commerce		85 7th Place E, Suite 500 St. Paul MN, 55101 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
48	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave, St. Louis MO, 63102 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
49	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
50	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
51	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
52	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
53	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
54	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
55	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
56	Cristina	Zuniga	czuniga@otpco.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST