



414 Nicollet Mall
Minneapolis, MN 55401

July 8, 2025

—Via Electronic Filing—

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

RE: COMMENTS
IN THE MATTER OF A COMMISSION EVALUATION OF CHANGES TO NATURAL
GAS UTILITY REGULATORY AND POLICY STRUCTURES TO MEET STATE
GREENHOUSE GAS REDUCTION GOALS
DOCKET NO. G999/CI-21-565

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these Comments in response to the May 5, 2025 Minnesota Public Utilities Commission Notice of Comment Period.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Pamela Gibbs at 612-330-2889 or pamela.k.gibbs@xcelenergy.com or contact me at 612-330-7681 or lisa.r.peterson@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

LISA R. PETERSON
DIRECTOR, REGULATORY PRICING & ANALYSIS

cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF A COMMISSION
EVALUATION OF CHANGES TO NATURAL
GAS UTILITY REGULATORY AND POLICY
STRUCTURES TO MEET STATE
GREENHOUSE GAS REDUCTION GOALS

DOCKET NO. G999/CI-21-565

COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Comments in response to the May 5, 2025 Minnesota Public Utilities Commission Notice of Comment Period.

The Company thanks the Commission for this opportunity to comment on the issue of whether to modify existing gas line extension policies for rate regulated utilities. As discussed further below, the Company does not believe it would be appropriate to modify line extension policies at this time. It is important to allow customers, especially low-income and rural customers, to have affordable access to the resource of natural gas, which can provide heat and power more efficiently and cost-effectively than electricity in cold weather.

The Company believes that continuing to offer its existing line extension allowance is compatible with reducing greenhouse gas (GHG) emissions. Xcel Energy has a Net-Zero Vision by 2050 for natural gas, which is aligned with Minnesota's state goal to become carbon neutral by 2050. This vision is consistent with the Commission's October 28, 2024 Order in Docket No. G008,G-002,G011/CI-23-117, which establishes a comprehensive framework for natural gas integrated resource planning. The Order emphasizes GHG emission analysis, equity considerations, and the prioritization of cost-effective, low-emission resources as part of a planning process designed to determine the mix of resources that best protect ratepayers and public interests; maintains safe, reliable, and affordable service; and advances Minnesota's state policy objectives. In this context, the Company's line extension allowance for new customers - a policy that existing customers have benefited from - is grounded in

the Commission's directive to evaluate all resources on a consistent and integrated basis.

We commend the Commission for adopting this policy framework, which provides a clear and balanced approach to meeting the state's energy and climate goals. We believe that preserving our existing line extension policy maintains that balanced approach to the benefit of our customers and the State.

COMMENTS

I. BACKGROUND

The Commission examined the issue of new customers' rights to fair natural gas service extension policies and tariffs as part of Docket No. G-999/CI-90-563. In its March 31, 1995 Order, the Commission determined:

On the basis of its work in this docket, the Commission finds that its approach to designing LDC service extension rates and policies is reasonable. The Commission's method provides a balance between the two main approaches to serve extension rate design.¹

The Commission described the two main approaches as follows:

The two main theoretical approaches are 1) the rolled-in-rates approach which allows LDCs to extend service to new customers without charge, and 2) the incremental-rates approach which requires all new customers to pay their own way, i.e. the full cost of their service extensions, at the time they connect to the LDC's system. The method used by Minnesota LDCs is a compromise between these two opposing approaches.

The Minnesota approach recognizes that residents benefit from having access to natural gas service and Minnesota LDCs benefit from being able to provide that service. In addition, the LDC's policies try to balance the interests of existing customers with new customers so that both groups are able to receive reasonably priced service. Consideration is also usually given to making service extension policies as simple as possible for customers to understand and for utilities to administer.²

As part of rate case filings, the Commission requires utilities to address several questions regarding line extension policy in future rate cases, including whether

¹ March 31, 1995 Order in Docket No. G-999/CI-90-563, at 6.

² March 31, 1995 Order in Docket No. G-999/CI-90-563, at 6 n.5 (emphasis added).

extension allowances should include the majority of all new extensions with only the extremely long extensions requiring a contribution in aid of construction (CIAC). The Company has complied with this requirement in its last six rate cases.

The Company's line extension allowance for gas main and service line extension policies are shown below. All installed footages over the line extension allowance are recovered from the customer at a cost based on the past year's average installation cost.

Residential Services

- All residential services receive a 75 foot line extension allowance under standard installation conditions. Any additional expenses, unusual construction, and extra footage over 75 feet are billed to the customer.

Residential Main

- Residential main extensions under 80 feet per home/lot are part of the line extension allowance if all homes receive natural gas service in the first calendar year. For homes not receiving natural gas in the first year, a refundable CIAC is collected upfront and can be refunded over a 5-year period if the homes connect to natural gas. The main CIAC is based on the average installation cost per foot from the previous year.
- Residential main extensions over 80 feet per home/lot are charged an upfront, nonrefundable CIAC. This cost is determined by customer yearly usage, number of services, meters, and main footage needed. The CIAC cost is determined by the Residential Extension Model (REM Model), which uses installation cost from previous year averages for main, services, meter, and regulators.

Commercial Main and Services

- Commercial customers are not charged a CIAC for gas main extensions and gas services if the revenues from their anticipated annual gas consumption exceed installation costs from previous year's averages for main, services, meter, and regulators. A customer will be charged a CIAC for portions of service or main extensions that did not revenue justify by its anticipated usage.

II. RESPONSE TO COMMISSION NOTICE

A. What Actions, if Any, should the Commission Take to Modify Existing Gas Line Extension Policies for Rate Regulated Gas Utilities?

1. Should the Commission consider any modifications to how gas utilities calculate free footage allowance and other costs related to gas main and service line extensions?

The Company's natural gas system provides customers with a critical heating service during the winter months in the cold climates we serve in addition to other commercial and industrial uses and secondary appliance uses. It is vitally important that all customers have equal access to the resource of natural gas, which can provide heat far more efficiently and cost-effectively than electricity in cold weather. Line extension allowance programs are an effective way to allow customers, especially low-income customers, affordable access to the resource of natural gas heating without the barrier of requiring them to pay a substantial amount of money upfront to get it. The 2025 cost of the Company's residential line extension allowance, inclusive of line and main service, is approximately \$2,400 per residential customer. This cost calculation is updated annually.

It is important to note that the line extension allowance is not "free" or a subsidy to the new customer. Under the current line extension allowance, new customers obtain service at reasonable rates that reflect the cost of service, while spreading the recovery over several years. This is consistent with the treatment of other assets such as meter costs, where the customer pays for the asset on an ongoing basis through base rates.

The Company's program aims to ensure equitable access to natural gas, especially in suburban and rural areas where homes are spaced farther apart. Offering a line extension allowance based on average main and service lengths allows new customers to obtain natural gas service at a reasonable rate, while protecting existing customers from paying for long extensions, and also allowing the utility to recover its costs. This approach appropriately balances the costs between new and existing customers and supports customer choice.

The current line extension policy is easy for customers to understand. It also provides savings to all customers in two ways. First, this approach spreads fixed infrastructure costs over a larger customer base, reducing the per-customer cost. Second, the line extension allowance program provides a cost savings to all customers in terms of reduced overhead. The current process requires minimal administrative processing for most of the new service installations (e.g., there is little back and forth communication between the Company and the customer, no waiting for payment to be received, etc.), which helps keep costs low for customers and avoids longer wait times for service.

The Company believes that the way it calculates the line extension allowance, and other costs related to gas main and service line extensions, provides a balanced, fair, reasonable, and affordable method of giving customers the option to access natural

gas service. Accordingly, the Company does not believe that changes to how it calculates the line extension allowance or other costs related to gas main and service line extensions are warranted or advisable at this time.

If so, what factors or conditions would justify changes? And how would any proposed changes affect new connecting customers and other ratepayers?

As noted above, the Company does not support making changes to the way it calculates line extension allowance, precisely because of the way it could affect new connecting customers (especially low-income and rural customers), as well as increasing costs for existing customers. However, should the Commission wish to consider changes, there are several important issues it would need to address.

State and Company policy goals to reduce greenhouse gas emissions are most likely to result in throughput reduction on the gas system over time. That does not mean, however, that the gas system is no longer needed today. For instance, the stakeholder process and consensus recommendations report produced by Great Plains Institute and Center for Energy and Environment recognizes that the most cost-effective and reliable way to reduce emissions from the natural gas system in support of the state's net-zero greenhouse gas goal is weatherization with electric space heating adoption, while retaining gas service for back-up heat during cold temperatures.³ Even with these important emissions reductions efforts, there remains a clear need to connect new customers to the gas system to meet customer demand. For instance, the Company responded to over 3,500 requests for new residential meters each year in 2022, 2023, and 2024.

That said, we understand new build electrification efforts may be more cost effective than retrofitting an existing household, for customers interested in electrification. As part of our corporate efforts to explore emissions reductions for our gas customers, we are working with new build sites on a voluntary basis to understand the barriers and opportunities for dual fuel and electric options and explore any opportunities early in the process that make sense for our customers and the system. As part of this approach, we will continue to provide our customers with options for all types of energy, including efficient electrification efforts, and ensure they are aware of options before deciding which electric and/or gas service options are right for them. However, it is premature to change extension policies given that natural gas continues to be relied upon by many utility customers.⁴ In most cases, customers still need

³ See Great Plains Institute, Center for Energy and Environment, 2021. "Decarbonizing Minnesota's Natural Gas End-Uses." <https://e21initiative.org/wp-content/uploads/2021/07/Decarbonizing-NG-End-Uses-Stakeholder-Process-Summary.pdf>.

⁴ See *Id.*

natural gas service for affordability. The Company believes that customers should have access to affordable and reliable options and be allowed to make the choice that is best for them.

Existing customers have historically benefited from our line extension policy, and that benefit should continue to be extended to new customers. We continue to monitor customer applications, adoption of electric appliances, throughput, and peak demand in order to make future investments in line with demonstrated customer needs. We suggest that the Commission should do the same and could consider line extension policy changes in the future.

2. If the Commission should make modifications to regulated gas utilities' gas line extension policies, how would rules, statutes, and Commission order justify those modifications?

The Company believes that its line extension allowance program provides a valuable service to both customers and potential customers and does not require modification at this time. The Company plans to review other stakeholder responses to this question and comment in the Company's Reply and/or Supplemental comments.

3. Which proposed modifications, if any, would necessitate gas utilities to coordinate and/or consult with electric utilities in the service territory where a gas line extension is being contemplated?

The Company plans to review proposals made by other stakeholders and comment in its Reply and/or Supplemental Comments.

4. How should the Commission consider the results of Minnesota Energy Resource Corporation's Line Extension Policy Study in this matter?

The Company does not take a position on this question at this time.

5. What lessons should the Commission consider from proceedings in other states related to this matter?

Other states undertaking review of and changes to their line extension allowance programs⁵ have different climates and different policy landscapes, making direct comparisons challenging.

⁵ E.g., California, Washington, Oregon, Colorado, Illinois, New York, Massachusetts, and Connecticut.

The Company notes, however, that line extension policy changes are often part of a multi-year process predicated by broader policy initiatives. The impacts and outcomes of line extension policy changes are not yet clear, even in states that have been exploring this course of action for years as implementation is relatively recent. Additionally, it remains unknown if changing line extension allowance programs helps advance state greenhouse gas reduction policy objectives.

The Company believes that when changes to line extension allowance policies are pursued, key elements include making changes over time, and granting exceptions where alternates are not feasible and GHG emissions are reduced.

6. Should any distinctions be made between different customer classes when considering modifications?

Although not a difference in customer classes, the Company notes that modifying the line extension policy would place a greater burden on rural residential customers than those in higher density locations where the distance to connect to the natural gas system is shorter. This could prevent rural customers from being able to choose the best energy solution for their situation. In rural areas, customers without access to natural gas often look to propane for a heating and energy solution. Creating cost barriers for rural customers to convert from propane to natural gas runs contrary to greenhouse gas reduction goals because natural gas is not only a lower cost but also has lower greenhouse gas emissions than propane.

The Company also notes that in rural areas, a decision not to connect a development to the natural gas system significantly impacts the next development beyond it, making it much more expensive for the second development to connect to the natural gas system. This reduces the choices for customers in rural areas.

In terms of distinctions between classes, the Company notes that our current line extension policy offers specific main and service footage allowances for the Residential class, while the Commercial class footage allowances are determined through a cost justification formula. Due to the variable nature of Commercial service interconnection costs, we believe it is appropriate to continue to look at Commercial service cost justification using the formula in tariff. Because the majority of Residential line extensions are similar cost-wise, it is appropriate to offer specific lengths for footage allowances.

7. How should the Commission consider the needs of low-income customers and other areas of equity in this matter?

Natural gas is the lowest cost alternative to heat and power homes.⁶ For instance, in Minnesota the average gas water heating cost is \$206/year, while the average electric water heating cost is \$308/year,⁷ a savings of over 33 percent. Accordingly, it is vital that low-income customers have the opportunity to access this low-cost resource for their energy and heating needs.

In addition, for those low-income customers seeking to reduce their carbon footprint, weatherization and using an air source heat pump (ASHP), *with gas back-up*, is the most cost-effective way to reduce greenhouse gas emissions, which still requires access to the natural gas system.

Low-income customers stand to lose the most from changing the Company's line extension allowance policy by making it harder for them to connect to the natural gas system. The Company does not believe this is the right course of action without having broader state policy measures in place to address this burden.

8. Are there other issues or concerns related to this matter?

The Company has not identified any at this time.

CONCLUSION

The Company thanks the Commission for this opportunity to comment on the issue of modifying existing gas line extension policies for rate regulated gas utilities. The Company does not believe that changes are advisable at this time.

Dated: July 8, 2025

Northern States Power Company

⁶ See 88 Fed. Reg. 58575, 58576 (Aug. 28, 2023).

⁷ See Learn Metrics at <https://learnmetrics.com/gas-vs-electric-water-heater-running-cost>, accessed on June 15, 2025.

CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET No. G999/CI-21-565

Dated this 8th day of July 2025

/s/

Victor Barriero
Regulatory Administrator

#	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	21-565Official Service List
2	Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource		15669 WATERLOO CIR TRUCKEE CA, 96161 United States	Electronic Service		No	21-565Official Service List
3	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	21-565Official Service List
4	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
5	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	21-565Official Service List
6	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
7	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
8	Randall	Beck	rbeck3@wm.com	Waste Management Renewable Energy, L.L.C.		1021 Main St Houston TX, 77002 United States	Electronic Service		No	21-565Official Service List
9	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	21-565Official Service List
10	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	21-565Official Service List
11	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
12	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
13	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
14	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	21-565Official Service List
15	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
16	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	21-565Official Service List
17	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	21-565Official Service List
18	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	21-565Official Service List
19	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	21-565Official Service List
20	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
21	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	21-565Official Service List
22	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	21-565Official Service List
23	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	21-565Official Service List
24	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	21-565Official Service List
25	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	21-565Official Service List
26	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	21-565Official Service List
27	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
28	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
29	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
30	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
31	Tom	Dicklich	tdicklich@mntrades.org	Minnesota Building & Construction Trades Council		353 W. 7th St Rm 105 Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
32	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
33	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
34	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	21-565Official Service List
35	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	21-565Official Service List
36	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	21-565Official Service List
37	Mark	Foster	mark@housingfirstmn.org	Housing First Minnesota		2960 Centre Pointe Drive Roseville MN, 55113 United States	Electronic Service		No	21-565Official Service List
38	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	21-565Official Service List
39	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	21-565Official Service List
40	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
41	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	21-565Official Service List
42	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	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
43	Laura	Haight	lhaight@pfpi.net	Partnership for Policy Integrity		POB 2513 Amherst MA, 01004 United States	Electronic Service		No	21-565Official Service List
44	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
45	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	21-565Official Service List
46	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	21-565Official Service List
47	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
48	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	21-565Official Service List
49	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	21-565Official Service List
50	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-565Official Service List
51	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
52	Alan	Jenkins	aj@jenkinsattlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21-565Official Service List
53	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
54	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
55	Brendan	Jordan	bjordan@gpsid.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	21-565Official Service List
56	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	21-565Official Service List
57	D	Kalmon	dkalmon@mwmw.org	Mississippi Watershed		2522 Marshall St NE	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Management Organization		Minneapolis MN, 55418-3329 United States				Service List
58	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	21-565Official Service List
59	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
60	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	21-565Official Service List
61	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	21-565Official Service List
62	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
63	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	21-565Official Service List
64	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
65	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	21-565Official Service List
66	Robert	Lems	administration@dmr-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	21-565Official Service List
67	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	21-565Official Service List
68	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	21-565Official Service List
69	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-565Official Service List
70	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
71	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21-565Official Service List
72	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
73	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	21-565Official Service List
74	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
75	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	21-565Official Service List
76	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	21-565Official Service List
77	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-565Official Service List
78	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	21-565Official Service List
79	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
80	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-565Official Service List
81	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
82	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	21-565Official Service List
83	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
84	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
85	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
86	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	21-565Official Service List
87	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	21-565Official Service List
88	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	21-565Official Service List
89	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
90	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
91	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	21-565Official Service List
92	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	21-565Official Service List
93	Bret	Pence	bretpence@mnipl.org	Minnesota Interfaith Power and Light		106 Waverly Place Duluth MN, 55803 United States	Electronic Service		No	21-565Official Service List
94	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List
95	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	21-565Official Service List
96	Kevin	Pranis	kpranis@iunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	21-565Official Service List
97	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	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
98	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	21-565Official Service List
99	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	21-565Official Service List
100	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	21-565Official Service List
101	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	21-565Official Service List
102	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
103	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-565Official Service List
104	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	21-565Official Service List
105	Patrick	Serfass	pserfass@ttcorp.com	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
106	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
107	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	21-565Official Service List
108	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	21-565Official Service List
109	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	21-565Official Service List
110	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
111	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
112	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	21-565Official Service List
113	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	21-565Official Service List
114	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
115	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
116	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
117	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List
118	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
119	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
120	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-565Official Service List
121	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	21-565Official Service List
122	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	21-565Official Service List
123	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L Street #513 Sacramento CA, 95814 United States	Electronic Service		No	21-565Official Service List
124	Nicole	Westling	nicole.westling@state.mn.us		Department of Commerce	85 7th Place E Suite 280 St Paul MN, 55001 United States	Electronic Service		No	21-565Official Service List
125	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Plymouth MN, 55441 United States				Service List
126	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	21-565Official Service List
127	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
128	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	21-565Official Service List
129	Grant	Zimmerman	gzimmerman@ampamericas.com	Amp Americas		811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States	Electronic Service		No	21-565Official Service List
130	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	21-565Official Service List
131	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List