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March 30, 2021

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

**RE: In the Matter of an Inquiry into CenterPoint Energy's Investments that May Assist
in Minnesota's Economic Recovery from the COVID-19 Pandemic
Docket No. G-008/M-20-889
Reply Comments**

Dear Mr. Seuffert:

On March 29, 2021, CenterPoint Energy filed the following Reply Comments, but unintentionally omitted Attachments A and B from its filing. We are refiling today, March 30, 2021, with the attachments included.

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company"), respectfully submits the following Reply Comments in response to the February 16, 2021 comments filed by LIUNA Minnesota and North Dakota and March 17, 2021 comments filed by the Minnesota Department of Commerce ("Department") and the Minnesota Office of the Attorney General – Residential Utilities Division ("OAG") in the above-referenced docket.

Please contact me at (612) 321-4625 or amber.lee@centerpointenergy.com with any questions.

Sincerely,

/s/ Amber Lee

Amber Lee
Director, Regulatory Affairs

Docket No. G008/M-21-138

March 15, 2021

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cc: Service List

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

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Valerie Means
Matt Schuerger
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Commissioner
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Commissioner

In the Matter of CenterPoint Energy's Petition
for Review of Investments that May Assist in
Minnesota's Economic Recovery from the
COVID-19 Pandemic

Docket No. G-008/M-20-889

REPLY COMMENTS

I. Introduction

On December 18, 2020, in response to the Minnesota Public Utilities Commission's (the "Commission's") call to action in Docket No. E,G999/CI-20-492, for utility investments that could assist in Minnesota's economic recovery from the COVID-19 pandemic, CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") filed a Petition requesting review and deferred accounting for seven proposed investments beginning in 2021.¹ As outlined in the Company's filing, the proposed investments provide utility system and safety benefits, emissions reductions and avoidance, increased access to conservation and clean energy, and increased customer access to utility information, while also assisting in Minnesota's economic recovery from the COVID-19 pandemic by creating jobs, stimulating economic growth, and delivering value to customers.

The Company's proposal was the product of multiple rounds of comments, incorporating the recommendations from a diverse group of stakeholders and extensive analysis and refinement over the course of multiple months. CenterPoint Energy's Petition also provided detailed support for the reasonableness and prudence of the proposed investments.

On February 16, 2021, LIUNA Minnesota and North Dakota submitted Comments in support of the Company's Petition concluding that the Company's proposed Tranche 1 investments will provide critical job creation, while helping Minnesota achieve its clean energy goals by embracing innovative clean energy technologies.

On March 17, 2021, the Department of Commerce, Division of Energy Resources (the "Department") and the Minnesota Office of the Attorney General – Residential Utilities Division

¹ One of those projects, the Advanced Meter Project, was separately docketed in Docket No. G008/21-48. The remaining six projects are addressed in this docket.

("OAG") filed Comments in response to the Company's Petition. CenterPoint Energy thanks LIUNA, the Department, and the OAG for their review and analysis and submits these Reply Comments to respond to their comments and recommendations.

In their Comments, both the Department and the OAG note the recent natural gas market price spike event that occurred in February 2021, which is likely to have a significant impact on customer bills. The Department recommends that the Commission defer any decision on approval of CenterPoint Energy's proposed projects in this docket until a full understanding of the rate impact of the February gas market event on customer bills is known. The OAG states that "this price spike was not anticipated when the Commission sought input on ways that utilities could assist with the economic recovery from the COVID-19 pandemic."²

It is true that the February gas market price spike was not anticipated when CenterPoint Energy submitted its Petition in response to the Commission's request for proposals that could assist with economic recovery. And while the Company agrees with the Department that it is necessary to ensure overall customer bills remain reasonable and affordable, the Company does not agree that the unprecedented gas market spike that was experienced in February can or should be used as a justification to abandon pursuit of the important objectives set forth in the Commission's May 20, 2020 Notice in Docket No. E,G999/CI-20-492.

CenterPoint Energy submitted a proposal designed to mitigate the impacts of the February gas market event on March 15, 2021, in Docket No. G008/M-21-138. As outlined in that filing, if the Commission takes no action and allows the costs associated with the February Market Event to flow through the normal annual automatic adjustment true-up process, customers would see significant increases to their monthly bills beginning in September 2021. Because the timing of the normal true-up in September corresponds with the beginning of the heating season and because the true-up is billed on a volumetric basis, customers would be subject to significant bill impacts through the 2021-2022 heating season. Swift action on the Company's February gas cost recovery proposal is critical to ensure customers are protected and further harm due to credit impacts are avoided to the extent possible.

The importance and value of the investments proposed in the Company's December 18, 2020 Petition in this docket are not undermined by the February gas market event. If anything, the February gas market spike and the impacts that event will have on CenterPoint Energy and our customers has intensified the need for and importance of the project proposals set forth in the Company's December 2020 Petition. Expanded access to conservation, training and education, jobs, and the accessibility of customer communications through the proposed translation project are increasingly important.

The investments the Company has proposed are also consistent with the Commission's role, as identified by the OAG,³ to:

² OAG Comments at 1.

³ OAG Comments at 4.

[P]rovide the retail consumers of natural gas and electric service in this state with adequate and reliable services at reasonable rates, consistent with the financial and economic requirements of public utilities and their need to construct facilities to provide such services or to otherwise obtain energy supplies, to avoid unnecessary duplication of facilities which increase the cost of service to the consumer and to minimize disputes between public utilities which may result in inconvenience or diminish efficiency in service to the consumers.⁴

The Company agrees with the Commission that utilities and the Commission can and should play an important role in the recovery of the economy, both through the immediate steps we have taken to provide relief to our customers who are facing hardships as a result of the pandemic, and by stimulating economic development and job creation over the coming years.

Through these Reply Comments, CenterPoint Energy provides updates regarding its proposed project investments based on current information. We continue to request that the Commission take action on this docket as soon as practical. As discussed in these Comments, the Company agrees to withdraw its request for deferred accounting treatment with respect to the accelerated pipe replacement project, the hydrogen pilot projects, the high-tech demonstration kitchen, and the verification of GIS service line information project. Instead, CenterPoint Energy respectfully requests that the Commission find these projects are consistent with the Commission's request for proposals that could assist with economic recovery in the May 22, 2020 Order in Docket No. E,G999/CI-20-425 and find that acceleration of these project shall not be a basis for any disallowance of cost recovery. Additionally, because the Company's December 2020 Petition is still pending and it is already the end of March, there is insufficient time to complete the work that would be required to plan for and implement the proposed excavator audit and city ambassador projects. CenterPoint Energy is therefore withdrawing its request for approval of these projects at this time.

With respect to the workforce development project and the translation project, if the Commission does not approve the Company's request for deferred accounting as proposed, CenterPoint Energy will not move forward with these projects in 2021 as these O&M investments cannot be recovered absent the Commission authorizing deferred accounting. Consistent with the Company's Petition and the Comments filed by LIUNA, it would be appropriate for the Commission to authorize the Company to recovery carrying costs as proposed in light of the benefits that these projects will provide.

In summary, CenterPoint Energy respectfully requests that the Commission:

- Find that the accelerated pipe replacement project, the hydrogen pilot projects, the high-tech demonstration kitchen, and the verification of GIS service line information project are consistent with the Commission's request for proposals that could assist with

⁴ Minn. Stat. § 216B.01.

economic recovery in the May 22, 2020 Order in Docket No. E,G999/CI-20-425 and find that acceleration of these project shall not be a basis for any disallowance of cost recovery;

- Authorize for the Company to defer the costs of the workforce training and development project and translation project until such time as they are authorized for recovery in a rate proceeding;
- Authorize application of carrying costs on the tracker balance equal to CenterPoint Energy's cost of capital as approved by the Commission in the Company's 2019 rate case;⁵ and
- Approve ongoing reporting as recommended by the Department.

II. Proposed Projects

The projects the Company has proposed do not constitute "ratepayer funded stimulus" or reflect spending for the sake of spending. Rather, these projects provide utility system safety and reliability benefits, reduce carbon and other pollution emissions, increase access to conservation and clean energy resources, and improve the diversity of Minnesota's utility workforce through the use of women, veteran, and minority contractors.

A. Accelerated Pipe Replacement

The accelerated pipe replacement project involves acceleration of pipeline replacement projects undertaken in accordance with our distribution integrity management program ("DIMP"), in compliance with federal Pipeline and Hazardous Materials Safety Administration ("PHMSA") regulations in 49 C.F.R. 192, subpart (P). As summarized in the Company's Petition as well as the comments submitted by LIUNA, the proposed accelerated pipe replacement project will help Minnesota recover from the economic downturn caused by COVID-19, improve the safety and reliability of critical gas infrastructure, and will reduce greenhouse gas emissions.

In its Petition, the Company proposed incremental capital spending of approximately \$31.8 million in 2021 in addition to the Company's planned pipe replacement spending. Since that filing was made in December 2020, CenterPoint Energy has updated its proposed plans for accelerated pipe replacement work in 2021. Table 1 below summarizes the budgeted 2021 pipe replacement costs and the proposed accelerated pipe replacements project costs as updated.⁶

⁵ *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas for Authority to Increase Natural Gas Service in Minnesota*, Docket No. G008/GR-19-524, ORDER ACCEPTING AND ADOPTING AGREEMENT SETTLING RATES, AND INITIATING DEVELOPMENT OF CONSERVATION PROGRAMS FOR RENTERS (March 1, 2021).

⁶ The Company clarifies, in response to the Department's Comments, that the information provided in response to Department Information Request No. 2 reflected the total (budgeted and accelerated) costs related to the identified projects as of the date of that response. Current proposed incremental accelerated replacements are summarized in Table 1.

Table 1. Budgeted and Proposed Accelerated Pipe Replacement – Updated		
Budgeted Pipe Replacement Spending (2021)	Proposed Accelerated Pipe Replacement (2021)	Total 2021 Pipe Replacement (Budgeted and Accelerated Pipe Replacement Projects)
\$13,600,000	\$27,660,802	\$41,260,802

The Department recommends approval of the accelerated pipe replacement project and proposes that the Company be directed to separately track accelerated pipe replacement expenditures from its existing pipe replacement investments.⁷

The OAG, in contrast, recommends denial of the proposed accelerated pipe replacement project because, according to the OAG, the Company has not demonstrated that existing replacement plans will not maintain a safe or reliable utility system.

Replacement of obsolete materials and mitigation of other known risks on the gas distribution system as part of a utility distribution integrity management plan are necessarily multi-year initiatives. CenterPoint Energy continually assesses known risks on its system in order to understand and prioritize those risks. As described in the Direct Testimony of Mr. Kuchar in the Company's most recent rate case, Docket No. G008/GR-19-524, in developing schedules to address identified risks, the Company must evaluate the level of threat posed and establish a schedule that is achievable in light of resource and other construction constraints. As a result, obsolete material replacements are completed on a multi-year basis, with annual asset replacement selections being driven by risk analysis.⁸

The Company's bare steel replacement project, legacy plastic replacement project, and legacy steel pipe replacement project, which make up much of the accelerated pipe replacement proposal, are multi-year initiatives. As described in Mr. Kuchar's testimony in Docket No. G008/GR-19-524, the Company began to replace or cathodically protect 479 miles of unprotected bare steel mains in 2012, and in 2019, the Company determined an additional 29 miles of inadequately protected bare steel main needed to be included in the project. Similarly, the legacy plastic service line replacement project began in 2016 and involves the replacement of service lines made from materials identified by PHMSA in a series of advisory bulletins. The legacy steel pipe replacement project involves the replacement of certain vintage steel pipe known to have been manufactured, constructed, and/or operated using legacy practices that are no longer considered sufficient for effective risk management.

⁷ Department Comments at 4.

⁸ *In the Matter of the Application by CenterPoint Energy Res. Corp., d/b/a CenterPoint Energy Minn. Gas, for Auth. to Increase Nat. Gas Rates in Minn.*, Docket No. G-008/GR-19-524, DIRECT TESTIMONY OF MR. WILLIAM A KUCHAR III, P.E. at 40-41 (Oct. 28, 2019).

The OAG's suggestion that acceleration of these important distribution integrity programs is not justified on the basis of providing benefits through enhanced safety and reliability misunderstands the nature of such distribution integrity investments. The benefit of the accelerated pipe replacement project is not a "theoretical increase[] in the system's safety and reliability" as characterized by the OAG but an actual enhancement in system safety by removing known risks from the system more quickly.

As documented in the Company's Petition, the accelerated pipe replacement project will also avoid approximately 9,500 dekatherms ("Dth") of lost gas and an estimated 6,000 metric tons of carbon dioxide-equivalent emissions as a result of accelerating these projects to 2021. These avoided gas losses and emissions would not be realized in the absence of the acceleration of these investments.

The benefits of the accelerated pipe replacement project are significant, particularly in light of associated customer rate impact of this project. As outlined in the Company's Petition, the estimated average residential bill impact for this project would be approximately \$1.92.⁹ As noted in the Department's Comments, the Department reviewed "the reasonableness of each project and the balance between the benefits ratepayers may receive from improved reliability, and more energy savings with the added cost to ratepayers."¹⁰ Based on that assessment, the Department concluded that the accelerated pipe replacement project was reasonable and should be approved.

Because the accelerated pipe replacement project is a capital project, the Company also agrees to withdraw its request for deferred accounting with respect to this project. Instead, CenterPoint Energy respectfully requests that the Commission find that the accelerated pipe replacement project is consistent with the Commission's request for proposals that could assist with economic recovery in the May 22, 2020 Order in Docket No. E,G999/CI-20-425 and find that acceleration of this project shall not be a basis for any disallowance of cost recovery in the future. The Company intends to continue with pipe replacement activities based on the updated schedule and costs will be included in the next general rate case filing. In that proceeding, interested parties and the Commission will have an opportunity to evaluate the reasonableness and prudence of the costs. The Company also accepts the Department's proposal to separately track accelerated pipe replacement expenditures from its existing pipe replacement investments based on the \$13.6 originally budgeted 2021 pipe replacement costs.¹¹

B. Renewable Hydrogen Projects

The renewable hydrogen pilot projects are two projects that will provide energy to CenterPoint's customers by converting renewable electricity into hydrogen for blending into the Company's

⁹ This average customer rate impact was calculated based on the scope of the accelerated pipe replacement project as filed in December 2020. The scale of this project has been reduced, which will reduce the customer rate impacts. The rate impact analysis provided in Exhibit B to the Company's Petition did not incorporate the income tax impact on the equity portion of the rate of return.

¹⁰ Department Comments at 4.

¹¹ Department Comments at 4.

distribution system. The first hydrogen project is a 1.0 – 1.5 MW electrolyzer that is expected to be placed in service in 2022. The second hydrogen project is a 1.5 – 2.0 MW electrolyzer that is expected to be placed in service in 2023. These two projects will complement the Company's 1.0 MW renewable hydrogen pilot in Minneapolis, which is expected to be in service in 2021.

The Company's existing 1 MW renewable hydrogen project is currently underway, with project engineering approximately 90 percent complete. Major components that require long lead times have been ordered including the proton exchange membrane electrolyzer, the insulated gate bipolar transistor DC power supply, and the hydrogen handling and conditioning skid.

CenterPoint Energy is currently working to finalize specifications for the water conditioning and oxygen handling systems. Construction is scheduled to begin in the third quarter of 2021 with startup scheduled for the fourth quarter of 2021. Figure 1 below provides a 3D rendering of the in process renewable hydrogen pilot project.

Figure 1. 3D Rendering of Hydrogen Production Skid



These proposed renewable hydrogen pilot projects have environmental benefits through reduced emissions as renewable hydrogen is essentially carbon free, depending on the renewable generation used to produce it. Combining this renewable hydrogen with natural gas eliminates the carbon emissions from the natural gas that it replaces. CenterPoint Energy estimates that the current 1 MW renewable hydrogen project planned to be completed in 2021 will result in emissions reductions of approximately 1,200 tons of carbon dioxide equivalent emissions (“CO₂e”) per year. The two additional, larger pilot projects will result in the avoidance of approximately 82,000 metric tons of CO₂e over the life of these projects. Renewable hydrogen is likely to play a key role in decarbonizing Minnesota's energy system and as noted by LIUNA these pilot programs “will have both immediate job creation benefits as well as long term benefits in helping Minnesota continue to lead the region in its implementation of low

carbon energy.”¹²

The Department recommends denial of the two proposed renewable hydrogen pilot projects in order to provide an opportunity for CenterPoint Energy to complete and evaluate its current pilot project.¹³ The Department also questions why the proposed pilot projects have higher O&M expenses as compared to the currently pending 1 MW pilot project. CenterPoint Energy is continuing to refine and evaluate the O&M costs for these two pilot projects.

As work on these two renewable hydrogen pilot projects will not occur until 2022 and 2023, CenterPoint Energy acknowledges that the Commission does not need to take immediate action on these two projects. Instead, CenterPoint Energy respectfully requests that the Commission find that these two pilot projects are consistent with the Commission’s request for proposals that could assist with economic recovery in its May 22, 2020 Order in Docket No. E,G999/CI-20-425 and find that acceleration of these projects shall not be a basis for any disallowance of cost recovery. These findings are consistent with the Commission’s March 12, 2021 Order¹⁴ on Xcel Energy’s proposed economic recovery projects and will allow CenterPoint Energy to potentially bring these projects forward in its next rate case. In the Company’s next rate case, the Department and other parties will have an opportunity to evaluate the reasonableness and prudence of the projects.

C. High-Tech Demonstration Kitchen

To assist with Minnesota’s economic recovery and increase access to conservation in the foodservice industry, CenterPoint Energy proposes constructing a new high-tech demonstration kitchen that would support a rebounding foodservice industry. This project is specifically targeted to provide Minnesota’s restaurant and foodservice industry with access to and training with energy efficiency equipment as it recovers from the pandemic. The foodservice industry has been especially hard hit during the pandemic and has a relatively high proportion of minority-owned businesses compared to other industries. The project will increase access to conservation and is projected to result in significant energy conservation improvement program (“CIP”) savings. The proposed high-tech demonstration kitchen project is forecasted to cost approximately \$6 million to construct, with ongoing expense for newly-hired employees to run the facility and provide demonstrations.

As discussed in the Company’s Petition and described in the comments filed by LIUNA, the investment in a high-tech demonstration kitchen will not only create immediate construction job opportunities, but the facility will encourage the wide-scale adoption of high-efficiency natural gas equipment. Energy efficiency jobs, from the installation of high-efficiency energy products to work on home energy audits, provide a significant source of employment in Minnesota. There is

¹² LIUNA Comments at 1.

¹³ Department Comments at 4-5.

¹⁴ *In the Matter of a Proposal by Xcel Energy for Authorization to Recover Costs for Investments that May Assist in Minnesota’s Economic Recovery from the COVID-19 Pandemic*, ORDER DETERMINING THAT PROPOSALS HAVE THE POTENTIAL TO BE CONSISTENT WITH COVID-19 ECONOMIC RECOVERY, Docket No. E,G002/M-20-716 (March 12, 2021).

significant opportunity for greater adoption of more energy efficient appliances as major food service institutions embrace more efficient appliances and employ highly-trained workers to install the new equipment.

Both the OAG and the Department take issue with the proposed high-tech demonstration kitchen. The Department concludes that “while replacing the existing [commercial foodservice learning center] may be necessary at some future point in time, its current replacement will not necessarily result in additional participation or energy savings through the Company’s CIP Programs.”¹⁵ The OAG asserts that the Company has not shown that this investment is needed to increase energy conservation, or that the project would be cost-effective compared to alternative ways of increasing conservation.¹⁶

As discussed in the Company’s Petition, CenterPoint Energy’s existing kitchen demonstration space is located within its Linden Avenue office building, where demonstrations and trainings are provided. However, that facility is in need of significant upgrades and a new facility will be required in the near term. The current kitchen was added as a renovation to the existing office space in the 1990s, and has limited capacity of up to thirty people for trainings, limited parking and access, constraints on changing over the demonstration appliances due to its location on the second floor, and lack of available storage.

A possible expansion of the existing space is not a viable option since the Linden Avenue office building is at capacity.¹⁷ The Company has also determined that it would not be feasible to update the existing kitchen facilities due to building and space limitations. Such a remodel would require an upgrade to the existing ventilation, which would cause unreasonable disruption to other operations within the office. Further, such upgrades would require significant investment while not addressing any of the other constraints on the current facility such as sufficient space, parking, and storage. As a result, at a minimum, the current commercial kitchen space will need to be moved to a new space in order to allow for either an expansion or an upgrade.

The proposed high-tech demonstration kitchen is not a second demonstration kitchen but rather a necessary replacement for the existing facility in the Linden Avenue building, in order to address deficiencies in that facility that will need to be addressed in the near term. The proposed project is designed to assist with Minnesota’s economic recovery by providing direct employment through construction, support for the restaurant and foodservice industry through increased training and education opportunities, and increased participation in conservation programs, including the Commercial Foodservice Rebate program. The proposed high-tech demonstration kitchen would provide much needed support to Minnesota’s restaurant and foodservice industry, a large proportion of which are minority-owned businesses. The proposed high-tech demonstration kitchen is intended to provide the following important benefits.

¹⁵ Department Comments at 5.

¹⁶ OAG Comments at 6.

¹⁷ See CenterPoint Energy Response to Department Information Request No 5, included as Attachment B to these Reply Comments.

- A dedicated first floor space that can accommodate trainings and educational programs for large groups as well as showcasing energy efficient commercial foodservice technologies. This dedicated space would allow foodservice professionals to test new high-efficiency foodservice technologies and see the Company's rebate offerings;
- Accessible training facilities with capacity for up to seventy-five participants per training;
- Kitchen equipment and amenities including energy efficient hoods, preparation and serving counters, refrigerators, freezers, sinks, and a separate dish room;
- A secure loading area for rotating equipment/appliances and adequate storage; and
- A separate entrance and adequate parking for end use customers and trade allies to attend trainings and demonstrations.

Additionally, the proposed high-tech demonstration kitchen would be designed to demonstrate commercial energy efficiency and provide benefits to the entire Commercial and Industrial (C&I) CIP Portfolio through an Energy Star rated high energy efficiency building. Remote training capability at this new facility would also create opportunities to make such trainings accessible to customers across the Company's service area.

The Department and OAG conclude that the proposed high-tech demonstration kitchen project will not result in increases to conservation but this conclusion appears to be based on a misinterpretation of what the Company's energy savings goals in the 2021-2023 Triennial Plan represent and how they relate to the goals of the proposed high-tech demonstration kitchen. Despite the significant economic hardship for the foodservice industry, the Company's 2021-2023 CIP plan has a Commercial Foodservice program goal of 60,527 Dth, which is in alignment with historic program performance prior to COVID-19 and any associated economic downturn. Given current economic conditions, the proposed high-tech demonstration kitchen will be important to allow the Company to reach and exceed energy savings goals in the Commercial Foodservice Equipment Rebate program in the coming years.

Further, as discussed in the Company's response to Department Information Request No. 6,¹⁸ CenterPoint Energy does plan to modify its CIP plan as needed to incorporate the results of the proposed high-tech demonstration kitchen. While the specific parameters of such modification are not known with certainty with regards to its Commercial Foodservice Equipment Rebates program, the Company has stated that the proposed high-tech demonstration kitchen will be used to train and promote commercial CIP participants with a goal of over 800 participants per year by 2023. The Company would plan on modifying participant goals for its Commercial and Industrial Training and Education in alignment with those goals.

¹⁸ Included as Attachment A to these Reply Comments. As stated in CenterPoint Energy's response, "the exact modifications and timing of those modifications to the Plan will depend on when training events can be fully transitioned from the existing Commercial Foodservice Learning Center space to the new High-Tech Kitchen space."

While the CIP energy savings achieved through the proposed high-tech demonstration kitchen will depend on the interest and demand by the restaurant and foodservice industry, the restaurant industry is already beginning to rebound. The Company would plan on filing a modification to its Commercial Foodservice Equipment Rebates program if it thinks a combination of industry rebound and the effects the high-tech demonstration kitchen is higher than planned achievement in 2022-2023.

On March 12, 2021, Governor Walz issued Executive Order 21-11, which authorizes restaurants, food courts, cafes, and other businesses offering food and beverages to provide indoor and outdoor service at up to 75 percent of normal capacity while providing for social distancing. CenterPoint Energy's proposal to begin planning and design for this project in 2021 with construction to be completed in 2022 will align well with increasing foodservice equipment investments associated with restaurant reopenings and new restaurant openings as the economy recovers.

Additionally, while the OAG suggests that the proposed high-tech demonstration kitchen project costs are not justified in light of the benefits, as demonstrated in the Company's Petition, the estimated average annual residential bill impact of this project is only \$0.43.¹⁹ The benefits to our customers from the proposed high-tech demonstration kitchen substantially outweigh the costs. As detailed in the Company's Petition, those benefits include estimated avoided gas costs of 900,000 Dth or \$2.7 million and approximately 47,000 metric tons of CO₂e emissions avoided with environmental cost value of \$550,000 to \$2.3 million and increased access to conservation.

While the Company continues to advocate for a new high-tech demonstration kitchen as proposed in its Petition, a smaller scale project consisting of a demonstration kitchen co-located within another CenterPoint Energy building could be considered instead. The Company estimates that this alternative would cost approximately \$3 million and would deliver fewer benefits in terms of economic stimulus, job creation, increased access to CIP, and training and education for the foodservice industry.

In summary, CenterPoint Energy is open to a more restricted project scope focused only on renovating another building space and including some amount of expense recovery through CIP. However, the Company does not agree with the OAG and Department that a new demonstration kitchen is not needed. Beyond the economic impacts of COVID-19 across industries, the foodservice industry has been significantly affected by closures during COVID-19. The Company believes all of the features in the \$6 million proposal have value that accrue to the construction industry and the foodservice industry while increasing access to

¹⁹ In reaching this conclusion, the OAG compares the cost of the proposed high-tech demonstration kitchen with the costs for the existing kitchen that are included in the Company's CIP. However, as explained in response to Department Information Request No. 5, historically, CIP has only covered a portion of the expense associated with the demonstration kitchen that are related to operating costs and not capital expense. In addition, the \$0.43 ratepayer impact is the highest annual residential rate impact based on proposed in-service date.

conservation and providing our commercial customers a valuable training and educational service.

Because the high-tech demonstration kitchen is a capital project and given the timing of the anticipated project, the Company agrees to withdraw its request for deferred accounting with respect to this project. Instead, CenterPoint Energy requests that the Commission approve the high-tech demonstration kitchen project as consistent with the Commission's request for proposals that could assist with economic recovery in the May 22, 2020 Order in Docket No. E,G999/CI-20-425 and find that acceleration of this project, which was already needed and planned to be undertaken in the near term, shall not be a basis for any disallowance of cost recovery in the future. If CenterPoint Energy proceeds with the project, we will include it in our next rate case filing. In that proceeding, interested parties and the Commission will have an opportunity to evaluate the reasonableness and prudence of the costs.

D. Workforce Training and Development

The workforce training and development project will increase the number of workers with the skills, training, and experience necessary to perform energy efficiency projects within CenterPoint Energy's service-area. This project also aims to increase the diversity of the energy efficiency workforce. This project will accomplish these objectives by investing in scholarships, internships, and certifications to help train, expand, and develop a larger and more diverse energy efficiency workforce. The workforce training and development project will train and support tradespeople with a focus on developing additional air sealing and insulation professionals that are currently in short supply.

The Department recommends approval of this project, noting that CenterPoint Energy's spending on workforce training can have an impact on future job opportunities for participants and encourage additional spending on energy efficiency and weatherization in the future.²⁰ The OAG proposes that rather than approve the workforce training and development project in this docket as proposed, the Company be required to submit this proposal "to the Department for review and potential inclusion in the Company's 2021-2023 [Conservation Improvement Program ("CIP")]."²¹

While CenterPoint Energy expects that the workforce training and development project will have a long-term effect on weatherization and the available energy efficiency workforce, the participants in the proposed programs will likely not enter the workforce until the end of current CIP 2021-2023 plan. Further, because the proposed workforce training and development project will not result in direct energy savings, including it in the Company's CIP would harm the portfolio's overall cost effectiveness. As a result, it would not be appropriate to add the workforce training and development project to CIP.

²⁰ Department Comments at 6.

²¹ OAG Comments at 9.

In support of its proposal that the workforce training and development project not be approved in this docket and instead be proposed in the Company's CIP, the OAG cites to a workforce training and development program proposed by Xcel Energy in its 2021-2023 electric and natural gas CIP in Docket No. E,G002/CIP-20-473. Xcel Energy's training program was proposed as a low-income program, which would then not be subject to cost-effectiveness requirements.²² The Department, in its March 1, 2021 Proposed Decision in that docket recommended that this project not be approved as a low-income program, concluding that "[a]s an indirect impact program, other than homes weatherized via the proposed insulation/air-sealing work crew, it would not directly deliver measures to low-income customers."²³ The Department's proposed decision will result in Xcel Energy having to further "limit the scope of the program as it would not be subject to the same protections regarding cost-effectiveness and net-benefit calculations."²⁴ Given the Department's proposed decision on Xcel Energy's proposed workforce training and development project, proposal of this project through CIP would not, in fact, be a reasonable or viable alternative to the Company's proposal in this docket.

This project goes above and beyond the Company's existing workforce training and development investments and will involve \$2.5 million in incremental O&M expenses in 2021. Both the Department and the OAG oppose granting deferred accounting treatment for the costs of this project. In order for CenterPoint Energy to move forward with the workforce training and development program in 2021, deferred accounting treatment of these incremental O&M costs is needed. Otherwise, there is no way for the Company to recover these O&M expenses that will be incurred between rate cases. CenterPoint Energy discusses how this project, as well as the translation project, qualify for deferred accounting treatment in Section III below. Moving forward with the workforce development and training project in 2021 will provide important customer benefits as well as economic benefits by providing workers with training and skills to perform jobs in energy efficiency and conservation.

If the Commission declines to grant deferred accounting treatment, CenterPoint Energy will not proceed with this project in 2021. In that case, the workforce development and training project could possibly be considered for inclusion in a future rate case filing, for implementation in 2022 or later.

²² Xcel Energy's Request for Modification of its 2021-2023 CIP Triennial Plan regarding the addition of three new programs, Docket No. E,G002/CIP-20-473 (Dec. 23, 2020).

²³ *In the Matter of Xcel Energy's Request for Modification of its 2021-2023 CIP Triennial Plan Regarding the Addition of Three New Programs*, Docket No. E,G002/CIP-20-473, Analysis, Recommendations and Proposed Decision of the Staff of the Minnesota Department of Commerce, Division of Energy Resources (Mar. 1, 2021).

²⁴ *In the Matter of Xcel Energy's Request for Modification of its 2021-2023 CIP Triennial Plan Regarding the Addition of Three New Programs*, Docket No. E,G002/CIP-20-473, Xcel Energy Comments at 4 (Mar. 16, 2021).

E. Damage Prevention Campaign

As discussed in the Company's Petition, gas line damages caused by factors outside of the Company's control (i.e., third party damage) have increased in recent years. Increased construction activity around our facilities has resulted in increased risk of gas line damage and the presence of new construction companies operating in the Company's service area increases the need for training to ensure safe digging practices. CenterPoint Energy has proposed three projects which are targeted at mitigating the risk of third party damage: (1) an audit of excavators with the most locate requests and most damage incidents; (2) the creation of a city ambassador program for those cities with the most locate activity; and (3) completion of research and field verification to compile and verify service line information in our geographic information system ("GIS").

In its Comments, the Department recommends that the Commission approve spending on the verification of line information in CenterPoint Energy's GIS system, but reject the other spending components. With respect to the verification of line information, the Department concludes that "ensuring the completeness and validity of the Company's service line information in the Company's GIS system will assist in damage prevention in the location and excavation work going forward."²⁵ As described in the Company's Petition, the research and field verification of service line data project is an important initiative to ensure complete, accurate, and verified information regarding service line records.

With respect to the city ambassador and audit projects, the Department concludes these projects do not appear to provide significant additional benefits beyond the Company's current processes.²⁶ However, as described in CenterPoint Energy's Petition, the majority of damages on CenterPoint Energy's gas lines are caused by factors outside of the utility's control, including third-party excavation damages. While the Company audits its locators to ensure they are accurately marking CenterPoint Energy facilities, the proposed excavator audit project would establish an audit program for excavators. Similarly, the City Ambassador project targets excavation and construction activities and associated line damages related to city road, sewer, and other public works projects. Both of these projects are narrowly targeted to reduce damage incidents based on the known causes of such incidents.

In recent years, construction activity across the metro and the state has increased significantly as the state and municipalities undertake increasingly more road, sewer, and other public works projects. As these activities continue to increase, the need to establish targeted and effective programs designed to train and educate excavation contractors to implement best practices to avoid utility facility damage is critical to mitigate the risk, costs, and inconvenience associated with gas line damages. For customers that are spending more time at home, such interruptions are even more disruptive.

²⁵ Department Comments at 6.

²⁶ Department Comments at 6.

While the Company continues to advocate that the excavator audit and city ambassador projects are important projects designed to help mitigate known risks associated with third party damage to natural gas lines, because the Company's December 2020 Petition is still pending and it is already the end of March, there is insufficient time to complete the work that would be required to plan for and implement these projects in 2021. Therefore, CenterPoint energy withdraws its proposal to complete these projects in 2021. However, we may propose these initiatives in our next rate case filing to be undertaken in 2022.

With respect to the verification of line information in CenterPoint Energy's GIS system, CenterPoint Energy appreciates the Department's recommendation that the Commission approve the approximately \$1 million in spending on this project.²⁷ Ensuring the completeness and validity of the Company's service line information in the Company's GIS system will assist in damage prevention in the location and excavation work going forward.

Because the GIS verification project is a capital project, the Company agrees to withdraw its request for deferred accounting with respect to this project. Instead, CenterPoint Energy respectfully requests that the Commission approve the GIS verification project as consistent with the Commission's request for proposals that could assist with economic recovery in the May 22, 2020 Order in Docket No. E,G999/CI-20-425 and find that acceleration of this project shall not be a basis for any disallowance of cost recovery. The Company intends to proceed with this project and will include costs for the completed project for recovery in its next rate case filing. In that proceeding, interested parties and the Commission will have an opportunity to evaluate the reasonableness and prudence of the costs.

F. Translation Project

The translation project is focused on improving accessibility, equity, participation, and engagement by expanding the customer communications and information that are available in Spanish, Hmong, and Somali, which are the primary languages for many of our customers across Minnesota. This project will ensure that important information related to natural gas safety, rates, billings, conservation, and energy efficiency are available in these other languages.

The Department supports approval of the translation project, recognizing that "equitable access to information is important for all customers."²⁸

CenterPoint Energy appreciates the Department's support for the translation project and believes it is important to move forward with this project. This effort is important to ensure customers can access relevant utility information, whether or not they have English language proficiency. Additionally, the compounding effects of widespread civil unrest, which resulted in further harm to communities we serve, has underscored the importance of, and need for, accessibility of utility communications. However, given that the translation project would require

²⁷ Department Comments at 6.

²⁸ Department Comments at 7. The OAG did not address the Translation Project in its comments.

\$2 million in incremental O&M expenses that are not included in base rates, deferred accounting treatment is needed to allow CenterPoint Energy to complete this project in 2021.

Without deferred accounting treatment, CenterPoint Energy would not have the ability to recover the incremental O&M expenses associated with implementing this project. If the Commission does not grant deferred accounting treatment for the translation project, CenterPoint Energy will not proceed with the project at this time. The Company would evaluate whether to propose the translation project as part of its next rate case. CenterPoint Energy discusses how this project, as well as the workforce training and development project, qualify for deferred accounting treatment in Section III below.

III. Request for Deferred Accounting

As discussed above, CenterPoint Energy has narrowed its request for deferred accounting to the \$5.5 million in incremental O&M associated with only two projects: (1) the workforce development and training project; and (2) the translation project. If the Commission does not approve the Company's request for deferred accounting for these two projects as proposed, CenterPoint Energy will not move forward with these projects in 2021, due to the fact that they require O&M spending which cannot be recovered without deferred accounting.

As the Commission has recognized, the circumstances of the COVID-19 pandemic, declaration of a peacetime public health emergency, and resulting economic recession, are unforeseen and unusual.²⁹ On May 22, 2021, in Docket No. E,G999/CI-20-425, the Commission took the unprecedented step of issuing a request for utility proposals that could assist with economic recovery. The Commission's call to action reflects the exceptional circumstances currently stemming from the COVID-19 pandemic and severe economic downturn and their impact on Minnesotans. In response to the Commission's request, CenterPoint Energy submitted a slate of proposed investments which provide significant utility system safety and reliability benefits, reduce carbon and other pollution emissions, increase access to conservation and clean energy resources, and improve the diversity of Minnesota's utility workforce through the use of women, veteran, and minority contractors.

Both the Department and the OAG oppose CenterPoint Energy's request for deferred accounting treatment with respect to the Company's proposed investments. But as the Department acknowledged in its comments,³⁰ while the Commission has set forth criteria for deferred accounting, the Commission has also granted requests for deferred accounting where, as here, utilities have incurred expenses to meet important public policy mandates.³¹ As outlined in the comments filed by LIUNA,

²⁹ *In the Matter of an Inquiry into the Financial Effects of COVID-19 on Nat. Gas and Elec. Utils.*, Docket No. E,G-999/CI-20-425, ORDER APPROVING ACCOUNTING REQUEST AND TAKING OTHER ACTION RELATED TO COVID-19 PANDEMIC at 5 (May 22, 2020).

³⁰ Department Comments at 13.

³¹ See *In the Matter of Otter Tail Power Co.'s Request for Approval of Elec. Vehicle Charging and Infrastructure Programs*, Docket No. E-017/M-20-181, ORDER APPROVING PILOT PROGRAM, GRANTING DEFERRED ACCOUNTING, AND SETTING ADDITIONAL REQUIREMENTS (Oct. 27, 2020).

In simple terms, use of deferred accounting would allow CenterPoint to accelerate beneficial system investments in order to create jobs when they are most needed, while giving the Commission the flexibility needed to defer cost recovery until the economy can better afford it. By mitigating the worst impacts of the recession and putting people back to work, accelerated investments coupled with deferred recovery can not only help current ratepayers by delivering immediate jobs and system benefits, but also leave future ratepayers better off as a result of economic stimulus.³²

Given the important role that these investments will play in advancing the Commission's stated public policy objectives of assisting Minnesota's economic recovery, CenterPoint Energy urges the Commission to grant deferred accounting. Consistent with the Company's Petition and the Comments filed by LIUNA, it would be appropriate for the Commission to authorize the Company to recovery carrying costs as proposed in light of the benefits that these projects will provide. As noted in our initial filing, there is Commission precedent for authorizing carrying costs at the cost of capital.³³ If approved, these incremental O&M costs will be subject to review for prudence and reasonableness when CenterPoint Energy seeks recovery in a future proceeding.

The Company continues to believe the projects proposed will deliver significant benefits to customers through improved safety and reliability, emissions reductions, increased access to conservation, while also providing economic stimulus to assist in Minnesota's economic recovery.

IV. Reporting

The Company proposed reporting with respect to each project in its Petition, based on the specific project proposal and the recommendation for reporting made in Docket No. E,G999/CI-20-492. In its Comments, the Department recommends that the Commission require CenterPoint Energy to submit annual compliance filings detailing the following information for each of the projects that are approved by the Commission:

- Separately track and report the amount of capital and O&M spending for each project;
- The scope of proposed work and scope of work completed; and

³² LIUNA Comments at 2.

³³ *In the Matter of the Application of Otter Tail Power Co. for Auth. to Increase Rates for Elec. Serv. in Minn.*, Docket No. E-017/GR-15-1033, ORDER AUTHORIZING COST RECOVERY, ANNUAL RATE ADJUSTMENT, CARRYING CHARGES, AND REQUIRING COMPLIANCE FILING (Nov. 10, 2020).

- The total number of people hired for the project; a breakdown between company employees and outside contractors, permanent and part-time, and the number of women, veterans, and BIPOC employed.

CenterPoint Energy agrees to report this information as recommended by the Department.

Additionally, consistent with the Commission's March 16, 2021 Order Accepting Economic-Recovery Investment Reports, Requiring Filings, and Encouraging Advancement of Diversity Goals, in Docket No. E,G999/CI-20-492, CenterPoint Energy will track investments separately from base rates to ensure transparency of recovery. Additionally, in accordance with Order Point 4 of the Commission's Order, CenterPoint Energy will submit quarterly reporting on the template to be developed by the Executive Secretary in consultation with the Department, starting with the quarter ending June 30, 2021.

V. Conclusion

Based on the foregoing, CenterPoint Energy respectfully requests that the Commission take action on the Company's petition, as modified in these Reply Comments, as soon as practical. The Company requests that the Commission:

- Find that the accelerated pipe replacement project, the hydrogen pilot projects, the high-tech demonstration kitchen, and the verification of GIS service line information project are consistent with the Commission's request for proposals that could assist with economic recovery in the May 22, 2020 Order in Docket No. E,G999/CI-20-425 and find that acceleration of these project shall not be a basis for any disallowance of cost recovery;
- Authorize for the Company to defer the costs of the workforce training and development project and translation project until such time as they are authorized for recovery in a rate proceeding;
- Authorize application of carrying costs on the tracker balance equal to CenterPoint Energy's cost of capital as approved by the Commission in the Company's 2019 rate case;³⁴ and
- Approve ongoing reporting as recommended by the Department.

³⁴ *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas for Authority to Increase Natural Gas Service in Minnesota*, Docket No. G008/GR-19-524, ORDER ACCEPTING AND ADOPTING AGREEMENT SETTLING RATES, AND INITIATING DEVELOPMENT OF CONSERVATION PROGRAMS FOR RENTERS (March 1, 2021).

State of Minnesota
Minnesota Department of Commerce

Utility Information Request

Docket Number: G-008/M-20-889 - COVID-19 Economic Recovery

Date of Request: 1/29/2021

Requested From: CENTERPOINT ENERGY MINNESOTA GAS

Response Due: 2/8/2021

Analyst Requesting Information: Susan Peirce

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
DOC 05	<p data-bbox="384 817 734 857">Topic: High-Tech Kitchen</p> <p data-bbox="384 898 1396 1205">Please provide planned and actual capital investments and non-capital expenses (broken down by major expense category) in 2020 for CPE's existing Commercial Foodservice Learning Center. Please also provide the Company's projected capital investments and non-capital expenses for 2021 for the Commercial Foodservice Learning Center. Does CPE's proposal for the High-Tech Demonstration Kitchen represent an upgrade of the existing center, or a complete replacement of the existing center? What are CPE's plans for the existing center?</p> <p data-bbox="384 1245 531 1285">Response:</p> <p data-bbox="384 1326 1396 1859">CenterPoint Energy does not have actual or planned capital investments for the Commercial Foodservice Learning Center ("CFLC") in 2020 or 2021. In the table below, the Company summarized estimates of non-capital expenses for the CFLC. The Company estimated general expenses for the current CFLC space and training program because those expense are allocated across Conservation Improvement Program ("CIP") and non-CIP functions. The majority of expenses are expected to be due to directly running trainings in the CFLC, including: staff time to run the training, staff time to develop and distribute advertising and promotional materials, and purchase training supplies such as food and office supplies. A portion of these costs are recovered through CIP while others are recovered through other mechanisms. For example, shared operation and maintenance expenses for the building (e.g., custodial services and utilities) of the CFLC are appropriated as part of the overall operation and maintenance of the building</p>

Response By: Seth DeMerritt
Title: Manager, Regulatory Affairs
Department: Mng Smr Reg Svc Rev Req
Telephone: 612-321-4423

space. Finally, only estimates of actual 2020 CIP expenses were available, changes may occur prior to our May 1, 2021 filing of the 2020 CIP Status Report.

	2020 Plan	2020 Actual*	2021 Plan
Total Expenses	\$120,000	\$44,000	\$126,000
Total Capital Expenses	\$0	\$0	\$0
Total Non-Capital Expenses:	\$120,000	\$44,000	\$126,000
Advertising and Promotion	\$38,000	\$11,000	\$40,000
Training Expenses	\$70,000	\$24,000	\$73,000
IT Equipment (e.g., computers)	\$2,000	\$1,000	\$2,000
Facility O&M	\$10,000	\$8,000	\$11,000

*Program expenses were lower than the 2020 plan due to lower than planned in person training.

CenterPoint Energy's proposal does not represent an upgrade of the existing center, but rather a replacement. The potential for upgrading the current CFLC is constrained by the existing building structure and the need to prevent disruptions to existing utility functions (e.g., call center). The building where the CFLC is located is in need of additional meeting space. If the High-Tech Commercial Kitchen is implemented then the Company plans on mostly using the existing CFLC as meeting space for staff and for holding special events such as conferences. Parts of the CFLC space may also be used for storage.

State of Minnesota
Minnesota Department of Commerce

Utility Information Request

Docket Number: G-008/M-20-889 - COVID-19 Economic Recovery

Date of Request: 1/29/2021

Requested From: CENTERPOINT ENERGY MINNESOTA GAS

Response Due: 2/8/2021

Analyst Requesting Information: Susan Peirce

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
DOC 06	<p data-bbox="384 817 847 857">Topic: High-Tech Kitchen and CIP</p> <p data-bbox="384 898 1396 1088">As a result of developing the High-Tech Demonstration Kitchen, would CPE plan to modify the CIP goals or make other program design changes to the Commercial & Industrial Training and Education Program or to the Commercial Foodservice and Equipment Rebates Program? If so, what are those changes?</p> <p data-bbox="384 1128 533 1169">Response:</p> <p data-bbox="384 1209 1396 1435">CenterPoint Energy plans on modifying the Company’s approved 2021-2023 Triennial Plan (“Plan”) as needed to incorporate the results of developing the High-Tech Demonstration Kitchen. However, the exact modifications and timing of those modifications to the <i>Plan</i> will depend on when training events can be fully transitioned from the existing Commercial Foodservice Learning Center space to the new High-Tech Kitchen space.</p> <p data-bbox="384 1476 1396 1816">In general, the Company expects to increase Commercial and Industrial Training participant goals and corresponding budget for the Commercial and Industrial Training and Education program in the first full year of High-Tech Commercial Kitchen operation (e.g., 2023). The Company may adjust participation goals and budget for the Commercial Foodservice Equipment Rebate program, but given current and ongoing economic uncertainties in the foodservice industry, adjustments to the Company’s already ambitious participation and energy savings goals will need to depend on future market conditions.</p>

Response By: Seth DeMerritt
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CERTIFICATE OF SERVICE

Erica Larson served the above attached Petition in Docket No. G-008/M-20-889 via e-filing to all parties on the attached service list.

/s/ Erica Larson
Erica Larson

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Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
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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	OFF_SL_20-889_Official Service List 20-889
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Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
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	OFF_SL_20-889_Official Service List 20-889
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Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889