



505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN 55459-0038

December 28, 2020

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 East 7th Place, Suite 350
St. Paul, MN 55101-2147

VIA E-FILING

**RE: Petition of CenterPoint Energy for Approval of a Rule Variance to Minnesota Rules Regarding Supplier (Pipeline) Refunds – Reply Comments
Docket Number G-008/M-20-838**

Dear Mr. Seuffert:

On November 23, 2020, CenterPoint Energy (the “Company”) submitted a request for approval of a variance to Minnesota Public Utilities Commission (“Commission”) Rules Regarding Supplier Refunds- - Minnesota Rule 7825.2700, Subp. 8. (Refunds) in accordance with the requirements of 7829.3200 (Other Variances).

On December 18, 2020, the Department of Commerce, Division of Energy Resources (the “Department”) filed Comments regarding the Company’s Petition. The Department recommends that the Commission (1) grant a variance and allow the Company to calculate the refund per unit amount using 4 months of actual usage rather than the 12 months required by Minn. R. 7825.2700, Subp. 8., and (2) require CenterPoint to report on the status of the refund after it is completed and to provide a reconciliation of its disbursement (i.e., compliance filing). The Company appreciates the analysis and Comments provided by the Department and supports the recommendation outlined in the Department’s analysis.

The Department also requested the Company provide additional information in Reply Comments. The Company provides the requested information separately below.

1. Refund Amount and Interest

The Department confirmed that while the Company did provide refund amounts, including interest, it would like to review the support for the amounts included in each of the refunds. The Company provides Attachment 1 in Excel format in response to this request supporting the supplier refund proposal and associated amounts provided in its initial Petition. Refund amounts, including interest, are shown in the “Class Allocation – 4 Months” tab in the section titled “Pipeline Supplier Refunds.” Additional detail supporting interest on refund balances has been included in the “Interest Calculation” tab.

2. Customer Refund Criteria

In its Petition and subsequent informal communication, the Company indicated plans to combine both Viking and NNG refunds into a one-time bill credit per active customer. In Comments, the Department requested explanation why Minnesota Statute § 345.34 is not

applicable to its pipeline refund and provide support that supplier gas cost refunds need only be refunded to active customers. As noted by the Department, Minnesota Stat. § 345.34 covers the issue of “Deposits Held by Utilities” and requires “(a)ny deposit held or owing by any utility made by a subscriber to secure payment for, or any sum paid in advance for, utility services” is presumed to be abandoned property if it has been unclaimed for more than one year. The Company interprets this rule to apply specifically to customer deposits, not refunds, and therefore believes Minnesota Stat. § 345.34 is not applicable in this instance.

The Department also noted in its Comments, “The Company explained in an informal communication that it would not refund anything to individual accounts if they have left or closed the account for a supplier pipeline refund as that refund is part of the Company’s gas costs.” The Company clarifies this statement and reiterates its proposal seeks to refund the entirety of the refunds received from Viking and NNG only to active sales customers who have accounts at the time the refunds will be disbursed in January 2021 and were previously billed gas costs between January 2020 and April 2020. In other words, the total amount of the supplier refunds will be included in the one-time bill credit provided to active customers as an appropriate and fair match of cost recovery.

The Company’s proposal to credit active customers through bill credits is the most administratively practical and timely method to return the full amount of the supplier refunds to customers and is consistent with how gas costs are typically recovered. In utility billing, customers are assigned a representative share of estimated gas costs, and charges and credits are accumulated over a year’s period. Customers are not billed gas costs in the same method as the costs to suppliers are paid. Timing of payments to suppliers does not follow customer payments, especially with demand billings. Minnesota Rules 7825.2600 – 7825.2910 allow for gas costs to be reconciled at year’s end by the purchased gas adjustment, and the supplier refund rule controls how to return refunds from pipeline suppliers. In addition, the Company’s proposed manner is consistent with how supplier refunds have been handled in the past¹ when refunding through the purchased gas adjustment mechanism (i.e., gas costs are reduced from refund, but only active customers receive the benefit of the lower gas costs).

3. Calculation of Refund Amount per Unit and Allocation to Customer Classes

The Refund Rule requires that “Refunds must be allocated to customer classes in proportion to previously charged costs of purchased gas.” The Company proposed in its Petition² to vary the refund rule by using customer sales billed over the four months of January 2020 through April 2020 instead of the latest 12 months of use prescribed by the rule. As proposed, the Company believes this method is a more precise allocation of the refunds to active customers over the period this group of customers was initially billed for pipeline services as part of cost-of-gas billed. While the Department recognized the rationale for this position in Comments³, it recommended CenterPoint provide additional support for this proposal in Reply Comments.

¹ See Docket No. G999/AA-12-756; CenterPoint requested permission to surcharge for the return of funds previously refunded to customers as a supplier refund.

² Discussion begins Section 4, Page 5, in CenterPoint’s Initial Filing in this docket.

³ See Department Comments at Page 7.

The Company provides Attachment 1 with the supporting calculations reflected in the initial Petition in response to the Department's request. The allocation of the refund to customer classes and the calculation of the refund amount per unit within the customer classes is included in the "Class Allocation – 4 Months" tab. This information was not provided initially since precise refund allocations and per unit calculations will not be finalized until the time bill credits are processed, which first requires Commission approval. This timing impacts final interest refund requirements and also the final identification of active customers that will receive the totality of the refunds.

4. **Ninety Day Refund Window**

Included as part of the variance request to Minnesota Rule 7825.2700, subpart 8, Refunds, the Company requested a variance to the 90-day refund requirement if Commission approval extends beyond January 2021.⁴ This request was combined in the Company's initial Petition with the discussion for a variance to the refund rule requiring to refund supplier pipeline charges based on individual customer's use over the latest 12 months of use. The Department indicated that while it agreed conceptually with the need for a variance to the 90-day refund rule requirement⁵, the Company should provide a separate discussion in Reply Comments. The Company provides additional discussion below supporting the variance request to the 90-day refund rule included as part of the initial Petition to ensure a complete record:

a. Proposed Variance Serves the Public Interest.

CenterPoint Energy requests a variance to Minnesota Rule 7825.2700, subpart 8, Refunds, requiring customers be refunded cumulative refund amounts equal or greater than \$5 per customer within 90 days from the date the refund is received from a supplier or transporter.⁶ The Company's understanding is the larger NNG refund triggers the \$5 average refund requirement and the October 31, 2020 receipt date should be the basis of the 90-day requirement⁷. Since a final Order may not be received by January 29 (90 days from October 31), a variance in this instance is reasonable since interest will accrue on customer refund balances up until the date of the proposed one-time bill credit. While the Company acknowledges the Viking refund alone was not large enough to trigger the \$5 per customer requirement, observing and refunding amounts together with the NNG refund is consistent with the rule and serves the public interest:

i. Enforcement of Rule would Impose an Excessive Burden on CenterPoint Energy and its Customers.

Enforcement of the rule imposes excessive burden because the dollar amount of the Viking refund is too small to effectively return to customers to whom was owed and not large enough to trigger the \$5 average refund

4 See Section 4, Page Nos. 5 through 7, included in the Initial Filing in this docket.

5 See Department Comments, Page 5.

6 Minn. R. 7825.2700-8

7 See Attachment 1 for financial information supporting the final receipt date of the NNG refunds.

requirement. Granting the proposed variance ensures the combined refunds, when administered together as a one-time bill credit, are returned to customers equitably in the most-timely manner possible in the event Commission action does not occur within the 90-day requirement, per the rule.

- ii. The Public Interest is not Adversely Affected by Varying the Rules
Granting the proposed variance does not negatively impact public interest since customers will receive full, cumulative interest on refund balances as part of the one-time bill credit up until the time of processing.
- iii. The Variance would not conflict with standards imposed by law
CenterPoint Energy is not aware of any laws that would be violated by granting this variance.

The Company appreciates the Department's thorough review of its initial Petition and the opportunity to address the request for additional information as part of its Reply Comments. As previously affirmed, the Company supports the recommendations outlined in the Department's analysis and confirms it will provide a full accounting of refund amounts, interest accrued and disbursement in a subsequent compliance filing after the refunds are processed.

If you have any questions or require additional information, please contact me at 612.321.5078 or Marie.Doyle@CenterPointEnergy.com.

Sincerely,

/s/

Marie M. Doyle
Regulatory Analyst

cc: Service List

Petition Table

Rate Class	4-month Average Refund	12-month Average Refund ¹
Residential	\$5.92	\$5.89
Com/Ind A	\$5.77	\$5.22
Com/Ind B	\$20.32	\$18.64
Com/Ind C	\$110.58	\$107.65
LG Firm	\$2,040.56	\$2,251.64
SVDF A	\$32.52	\$34.58
SVDF B	\$112.43	\$120.17
LVDF	\$152.27	\$233.79

1 - volumes reported in AAA for 2019-2020

Calculation of Refund Amount per Unit and Allocation to Customer Classes.

Assumptions and Methodology included in "Class Allocation - 4 Months" tab calculations.

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Attachment 1

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A. Allocation of Refund to Customer Classes:

- 1 Refund is assigned to sales service customers only (not transportation service customers)
- 2 Gas Sales Data includes active customers and sales data billed over the four months of January 2020 through April 2020
- 3 Telemetry customer data utilizes bill month following use, February 2020 through May 2020
- 4 Demand Allocator: % of Firm By Volume
- 5 Commodity Allocator: % of Total Sales By Volume
- 6 Large Firm customers: demand factors are based on Maximum Daily Quantity (MDQs)
- 7 Demand is not assigned to any interruptible customer
- 8 Allocation to Rate Class:

- ▶ Steps:
 - Identify refund from pipeline \$ as Demand (paid for capacity) or Commodity (transportation charges-per volume moved.)
 - Calculate Company interest to be added based on prime interest and time held
 - Allocate Demand dollars Small Firm v. Large Firm based on Design Day
 - Allocate Commodity dollars across ALL classes based on volumes used over allocation period
- ▶ Demand: *Allocate Sm/Lg based on Capacity assignment (Design Day)
 - Large Volume Firm *first*
 - = Total demand portion of Viking/NNG refunds (\$'s before CNP interest) multiplied by [Large Firm Design Day divided by Total Design Day (filed in 2019-2020 Demand Entitlement Filing and 2019 Rate Case)]
 - Small Firm
 - = Total demand portion of Viking/NNG refunds (\$'s before CNP interest) multiplied by [Small Firm Design Day divided by Total Design Day (filed in 2019-2020 Demand Entitlement Filing and 2019 Rate Case)]
 - Dual Fuel
 - = None
- ▶ Commodity: *Allocate based on Sale volume (System only)
 - Large Volume Firm
 - = Total commodity portion of Viking/NNG refunds (\$'s before CNP interest) multiplied by [SUM of Large Firm Commodity Allocator]
 - Small Firm
 - = Total commodity portion of Viking/NNG refunds (\$'s before CNP interest) multiplied by [SUM of Small Firm Commodity Allocator]
 - Dual Fuel
 - = Total commodity portion of Viking/NNG refunds (\$'s before CNP interest) multiplied by [SUM of Dual Fuel Commodity Allocator]

B. Calculation of the Refund Amount per Unit Within the Customer classes

- 1 Per unit refund factors:
 - ▶ Calculate per-unit refund factor separately Small Firm, Large Firm, and Dual Fuel.
 - Small Firm will be made up of allocated demand/commodity plus interest - FACTOR PER THERM used
 - Large Firm will be made up of allocated demand/commodity plus interest - FACTOR PER MDQ used in the period
 - Dual Fuel will be made up of allocated commodity only plus interest - FACTOR PER THERM used
 - ▶ For the MDQ - use summed monthly billed MDQs over the period (MDQ for 4 months).
 - for the MDQ - we summed the monthly billed MDQs over the period (MDQ for 4 months).
 - Small Firm will be made up of allocated demand/commodity plus interest - FACTOR PER THERM used
 - Large Firm will be made up of allocated demand/commodity plus interest - FACTOR PER MDQ used in the period
 - Dual Fuel will be made up of allocated commodity only plus interest - FACTOR PER THERM used

Pipeline Supplier Refund:

Viking and Northern Natural Gas (NNG) Rate Case refunds

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Attachment 1

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Gas Sales Data	Customers	Volumes (therms)	Demand Allocator % of FIRM By Volume	Commodity Allocator % of TOTAL Sales By Volume	
Jan 2020-April 2020					
Total System					
Residential	811,093	395,643,553	0.6202	0.5739	
Com - A	28,378	13,516,814	0.0212	0.0196	
Com/Ind - B	20,417	34,191,026	0.0536	0.0496	
Com/Ind - C	20,827	189,717,606	0.2974	0.2752	
Sm Firm - C /Interruptible	28	389,307	0.0006	0.0006	
Subtotal- Small Firm	880,743	633,458,306	0.9931	0.9189	
					MDQ/Peak Day
Large Firm	20	4,070,364	0.0064	0.0059	306,711
LG Firm (Combo)	2	360,243	0.0006	0.0005	24,000
FIRM	880,765	637,888,913	1.0000	0.9253	330,711
Interruptible (Dual Fuel)					
Small Volume Dual Fuel -A	927	18,439,932		0.0267	
Small Volume Dual Fuel -B	173	11,896,149		0.0173	
Sm Firm-C /SVDf-Interruptible		176,970		0.0003	
LG Firm/DF Combo		1		0.0000	
Large Volume DF	225	20,955,198		0.0304	
Total System	881,917	689,357,163		1.0000	

Pipeline Supplier Refunds:

	Demand	Commodity	Total	
Viking Pipeline	(\$126,673.40)	(\$1,137.62)	(\$127,811.02)	
Interest	(\$2,449.54)	(\$22.00)	(\$2,471.54)	
Subtotal	(\$129,122.94)	(\$1,159.62)	(\$130,282.56)	Initial Filing, Page 5, Footnote 1
NNG Pipeline	(\$6,325,771.46)	(\$1,133,496.88)	(\$7,459,268.34)	
Interest	(\$143,275.04)	(\$25,034.27)	(\$168,309.31)	
Subtotal	(\$6,469,046.50)	(\$1,158,531.15)	(\$7,627,577.65)	Initial Filing, Page 6, Footnote 2
Total Refund before Interest	(\$6,598,169.44)	(\$1,159,690.77)	(\$7,757,860.21)	
CNP interest @ Prime	(\$49,450.70)	(\$8,691.43)	(\$58,142.13)	
Total Refund	(\$6,647,620.14)	(\$1,168,382.20)	(\$7,816,002.34)	
Total Principal	(\$6,452,444.86)	(\$1,134,634.50)	(\$7,587,079.36)	
Total Interest (Pipeline+CNP)	(\$195,175.28)	(\$33,747.70)	(\$228,922.98)	

	Small Firm	Large Firm	Dual Fuel	Total
Design Day	13,911,310	78,690	0	13,990,000
Allocation to Rate Class				
Demand to LV First	\$ (6,561,056.51)	\$ (37,112.93)	\$ -	\$ (6,598,169.44)
Commodity (sales)	\$ (1,065,653.32)	\$ (7,453.52)	\$ (86,583.93)	\$ (1,159,690.77)
Interest to December 31, 2020	\$ (57,093.88)	\$ (399.33)	\$ (648.91)	\$ (58,142.13)
Total Refund	\$ (7,683,804)	\$ (44,966)	\$ (87,233)	\$ (7,816,002)
Principal	\$ (7,626,709.83)	\$ (44,566.45)	\$ (86,583.93)	\$ (7,757,860.21)
CNP Interest	\$ (57,093.88)	\$ (399.33)	\$ (648.91)	\$ (58,142.13)
	Small Firm Per Therm	Large Firm PER MDQ	Dual Fuel Per Therm	
FACTOR (per therm)	(\$0.012130)	(\$0.135967)	(\$0.001635)	
Principal	(\$0.012040)	(\$0.134759)	(\$0.001682)	
Interest	(\$0.000090)	(\$0.001207)	(\$0.000013)	

AVERAGE REFUND:	Residential	LG Firm	DF (Blend)
Annual Use (therms)	488	15,032	44,677
Amount to Credit	(\$5.92)	(\$2,043.90)	(\$73.05)

AVERAGE REFUND For 4 Months:	Residential	Com/Ind A	Com/Ind B	Com/Ind C	LG Firm	SVDf A	SVDf B	LVDF
Annual Use (therms)	488	476	1,675	9,116	15,032	19,892	68,764	93,134
Amount to Credit	(\$5.92)	(\$5.77)	(\$20.32)	(\$110.58)	(\$2,040.56)	(\$32.52)	(\$112.43)	(\$152.27)

Interest Estimate for Supplier Refund Account
Supplier Refund Account - 2020/2021 True-Up Year
 Refund Account #- 267030- SAP GL Acct no.

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Invoice Received: August 7, 2020
Beginning Balance, August 8, 2020: \$130,282.56 (Viking)

Aug-20		Beginning Balance	\$130,282.56	
		Interest	\$278.41	10/2/2020
		Ending Balance	\$130,560.97	
Sep-20		Beginning Balance	\$130,560.97	
		Interest	\$348.02	10/2/2020
		Ending Balance	\$130,908.99	
Oct-20		Beginning Balance	\$130,908.99	
10/1/2020 - 10/6/2020		Interest	\$69.60	11/2/2020
		Ending Balance	\$130,978.59	
Oct-20		Beginning Balance	\$130,978.59	
10/7/2020 - 10/25/2020		NNG Reservation Credit (Interest and Principal)	\$6,469,046.50	
		Interest	\$11,164.62	11/2/2020
		Ending Balance	\$6,611,189.71	
Oct-20		Beginning Balance	\$6,611,189.71	
10/26/2020 - 10/31/2020		NNG Transport Credit (Interest and Principal)	\$1,158,531.15	
		Interest	\$4,144.61	11/2/2020
		Ending Balance	\$7,773,865.47	
Nov-20		Beginning Balance	\$7,773,865.47	
11/1/2020 - 11/30/2020		Interest	\$20,723.05	
		Ending Balance	\$7,794,588.52	
Dec-20		Beginning Balance	\$7,794,588.52	
12/1/2020 - 12/31/2020		Interest	\$21,413.82	
		Ending Balance	\$7,816,002.34	

ESTIMATED REFUND-Through December 2020 **\$7,794,588.52**

Interest Calculation for TOTAL

Month Detail	Ending Balance	Prime Interest Rate	Daily Interest	Days	Interest
July 1-31	\$0.00	3.25%	0.008904%	31	\$0.00
August 1 - 7	\$0.00	3.25%	0.008904%	7	\$0.00
August 8 - 31	\$130,282.56	3.25%	0.008904%	24	\$278.41
September 1-30	\$130,282.56	3.25%	0.008904%	30	\$348.02
October 1-6	\$130,282.56	3.25%	0.008904%	6	\$69.60
October 7-25	\$6,599,329.06	3.25%	0.008904%	19	\$11,164.62
October 26-31	\$7,757,860.21	3.25%	0.008904%	6	\$4,144.61
November 1-30	\$7,757,860.21	3.25%	0.008904%	30	\$20,723.05
December 1-31	\$7,757,860.21	3.25%	0.008904%	31	\$21,413.82

TOTAL **\$58,142.13**

Prime Interest Rate
3.25%

Pipeline Supplier Refund:

Viking and Northern Natural Gas (NNG) Rate Case refunds

*Not proposed/for comparative illustration only

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Gas Sales Data		Customers	Volumes (therms)	Demand Allocator % of FIRM By Volume	Commodity Allocator % of TOTAL Sales By Volume	MDQ
Annual Avg of Actual Monthly Values July 1, 2019 through June 30, 2020	Total System					
Residential		806,533	721,478,190	0.6234	0.5600	
Com - A		28,130	22,300,430	0.0193	0.0173	
Com/Ind - B		20,278	57,442,350	0.0496	0.0446	
Com/Ind - C		21,034	344,150,200	0.2974	0.2671	
Sm Firm - C /Interruptible	NA			0.0000	0.0000	
Subtotal- Small Firm		875,975	1,145,371,170	0.9897	0.8890	
Large Firm		21	11,957,940	0.0103	0.0093	798,941
LG Firm (Combo)	NA			0.0000	0.0000	
FIRM		21	1,157,329,110	1.0000	0.8983	798,941
Interruptible (Dual Fuel)						
Small Volume Dual Fuel -A		971	40,299,450		0.0313	
Small Volume Dual Fuel -B		182	26,206,950		0.0203	
Sm Firm-C /SVDF-Interruptible	NA				0.0000	
LG Firm/DF Combo	NA				0.0000	
Large Volume DF		230	64,575,550		0.0501	
Total System		1,382	1,288,411,060		1.0000	

Pipeline Supplier Refunds:

	Demand	Commodity	Total
Viking Pipeline	(\$126,673.40)	(\$1,137.62)	(\$127,811.02)
Interest	(\$2,449.54)	(\$22.00)	(\$2,471.54)
subtotal	(\$129,122.94)	(\$1,159.62)	(\$130,282.56)
NNG Pipeline	(\$6,325,771.46)	(\$1,133,496.88)	(\$7,459,268.34)
Interest	(\$143,275.04)	(\$25,034.27)	(\$168,309.31)
subtotal	(\$6,469,046.50)	(\$1,158,531.15)	(\$7,627,577.65)
Total Refund before Interest	(\$6,598,169.44)	(\$1,159,690.77)	(\$7,757,860.21)
CNP interest @ Prime	\$49,450.70	\$8,691.43	\$58,142.13
Total Refund	(\$6,548,718.74)	(\$1,150,999.34)	(\$7,699,718.08)
Total Principal	(\$6,452,444.86)	(\$1,134,634.50)	(\$7,587,079.36)
Total Interest (Pipeline+CNP)	(\$96,273.88)	(\$16,364.84)	(\$112,638.72)

Initial Filing, Page 5, Footnote 1

Initial Filing, Page 6, Footnote 2

	Small Firm	Large Firm	Dual Fuel	Total
Design Day	13,911,310	78,690	0	13,990,000

Allocation to Rate Class

	Small Firm	Large Firm	Dual Fuel	Total
Demand to LV First	\$ (6,561,056.51)	\$ (37,112.93)	\$ -	\$ (6,598,169.44)
Commodity (sales)	\$ (1,030,941.45)	\$ (10,763.27)	\$ (117,986.05)	\$ (1,159,690.77)
Interest to December 31, 2020	\$ 56,666.26	\$ 591.61	\$ 884.26	\$ 58,142.13
Total Refund	\$ (7,535,332)	\$ (47,285)	\$ (117,102)	\$ (7,699,718)
Principal	\$ (7,591,997.96)	\$ (47,876.20)	\$ (117,986.05)	\$ (7,757,860.21)
CNP Interest	\$ 56,666.26	\$ 591.61	\$ 884.26	\$ 58,142.13

	Per Therm	PER MDQ	Per Therm
FACTOR (per therm)	(\$0.006579)	(\$0.059184)	(\$0.000833)
Principal	(\$0.006628)	(\$0.059925)	(\$0.000900)
Interest	\$0.000049	\$0.000740	\$0.000007

AVERAGE REFUND For 12 Months:	Residential	Com/Ind A	Com/Ind B	Com/Ind C	LG Firm	SVDF A	SVDF B	LVDF
Annual Use (therms)	895	793	2,833	16,362	38,045	41,517	144,258	280,662
Amount to Credit	(\$5.89)	(\$5.22)	(\$18.64)	(\$107.65)	(\$2,251.64)	(\$34.58)	(\$120.17)	(\$233.79)

CERTIFICATE OF SERVICE

Kristen Ruud served the Petition for Approval of a Variance to the Purchased Gas Adjustment Refund Rule – Reply Comments of CenterPoint Energy to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

/s/

Kristen Ruud
Regulatory Analyst
CenterPoint Energy

December 28, 2020

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-838_M-20-838
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_20-838_M-20-838
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-838_M-20-838
Seth	DeMerritt	Seth.DeMerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_20-838_M-20-838
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	Yes	OFF_SL_20-838_M-20-838
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-838_M-20-838
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-838_M-20-838
Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-838_M-20-838
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_20-838_M-20-838
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-838_M-20-838

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-838_M-20-838
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-838_M-20-838
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_20-838_M-20-838
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	No	OFF_SL_20-838_M-20-838
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-838_M-20-838
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_20-838_M-20-838
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_20-838_M-20-838
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_20-838_M-20-838
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-838_M-20-838

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Sudbury	Andrew.Sudbury@CenterPointEnergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55459-0038	Electronic Service	Yes	OFF_SL_20-838_M-20-838
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-838_M-20-838
Donald	Wynia	donald.wynia@centerpointenergy.com	CenterPoint Energy	CenterPoint Energy 505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_20-838_M-20-838