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August 27, 2025

via eFiling

Mr. Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2116

**Re: In the Matter a Petition by CenterPoint Energy Minnesota Gas for Approval of its First
Natural Gas Innovation Act Plan – Annual Report**

Docket No. G-008/M-23-215

REPLY COMMENTS

Dear Mr. Bull:

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or "the Company") submits these Reply Comments to the Minnesota Public Utilities Commission's (the "Commission") June 13, 2025, Notice of Comment Period and parties' initial comments discussing the Company's Natural Gas Innovation Act annual report for calendar year 2024 ("Report").

The Company thanks the Commission for consideration of these Reply Comments and respectfully requests that the Commission approve the Company's Report, the proposed Innovation Act Adjustment ("IAA") rates, and its proposed bill message.

If you have questions, please contact us at emily.suppes@centerpointenergy.com, 612-321-5363, or betsy.lang@centerpointenergy.com, 612-321-4318.

Sincerely,

/s/ Emily Suppes

Director, Regulatory Affairs

/s/ Betsy Lang

Lead Regulatory Analyst

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STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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In the Matter a Petition by CenterPoint
Energy Minnesota Gas for Approval of its
First Natural Gas Innovation Act Plan

Docket No. G-008/M-23-215

Reply Comments

I. INTRODUCTION

CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or “the Company”) submits these Reply Comments in response to the Minnesota Public Utilities Commission’s (the “Commission”) June 13, 2025, Notice of Comment Period¹ and parties’ initial comments discussing the Company’s Natural Gas Innovation Act (“NGIA”) annual report for calendar year 2024 (“Report”).²

On July 28, 2025, the Commission received comments from the Minnesota Department of Commerce (“Department”) and the Office of Attorney General—Residential Utilities Division (“OAG”). The Company will first briefly summarize these Comments. Then the Company will provide an update on the impact of recent federal law changes to its pilots, as that was of interest to both the Department and the OAG. Finally, the Company will respond to other specific questions and concerns raised in Comments.

II. Summary of Comments Received

a. Department Comments Summary

The Department recommended that the Commission accept the Report, approve the Company’s proposed Innovation Act Adjustment (“IAA”) rate, and approve the Company’s proposed bill message regarding the IAA rate change. The Department also asked CenterPoint Energy to provide some additional information and made a recommendation regarding future proposals to modify the IAA.

¹ *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Notice of Comment Period (June 13, 2025).

² *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Report (May 30, 2025).

The Department's requests for additional information are as follows:

- Explain in Reply Comments how the Company defines diverse vendors and determines whether a vendor satisfies the definition.
- Provide information on the success of obtaining investment tax credits ("ITCs") for renewable natural gas ("RNG") projects and any information the Company has on the estimated impacts to the costs for the Company and ratepayers of those ITCs in future annual reports.
- Provide further updates on the impacts of federal law and tax policy changes on its NGIA pilot programs as the Company learns of changes.

With respect to the IAA, the Department recommended placing future IAA rider modification proposals in a separate filing rather than in the same filing as annual reports in order to reduce administrative delays in setting IAA rates.

b. OAG Comments Summary

The OAG's Comments focus on Pilot D, Green Hydrogen Blending into the Natural Gas Distribution System, Pilot M, Commercial Hybrid Heating, and Pilot O, Small/Medium Business GHG Audit.

The OAG expressed two concerns with respect to Pilot D. First, the OAG notes that the recently enacted federal One Big Beautiful Bill Act ("OBBBA"),³ makes changes to tax credits applicable to Pilot D. Specifically, the Act moved up termination dates for solar investment and hydrogen production credits relative to previous law. The OAG expressed concerns regarding whether CenterPoint Energy would satisfy the revised tax credit requirements. Second, the OAG expressed concern regarding the Company's engagement with the City of Mankato with respect to the Pilot. In the Report, CenterPoint Energy expects to engage with Mankato city representatives in August. The OAG expressed concerns about whether that would provide sufficient opportunity for discussion of any City concerns before the Pilot must be under construction or in service to meet tax credit deadlines modified by the OBBBA.

The OAG requested that the Company provide additional information related to Pilot D as follows:

- Assess the potential impacts of OBBBA on the estimated tax benefits in Pilot D and describe what steps the Company will take to mitigate these potential impacts and receive the full tax benefits estimated.
- Provide more specific information on how the Company determined its beginning of construction and in-service estimates, and how the Company plans to ensure that those dates are not delayed.
- File a notification in this docket if the Company's beginning-of-construction or in-service dates for either the solar array or the electrolyzer are delayed in any way.
- Address how the Company will conduct meaningful community engagement on the timeline that will be required to earn the contemplated federal tax credits before they expire.

³ H.R. 1 (2025), Pub. L. No. 119-21.

With respect to Pilot M, the OAG's comments relate to the Company's request for proposal ("RFP") for the Pilot issued in 2025. The OAG expressed concern that the RFP did not adequately focus on providing the benefits of the Pilot to small businesses, particularly in environmental justice areas. The OAG further requested that the Company explain its plans to ensure its selected vendors will have sufficient experience with small businesses in environmental justice areas so they will benefit from Pilot M.

Regarding Pilot O, the OAG asserts that the Pilot is not sufficiently targeting "small business" as intended by the legislature. The OAG opines that the Company must make additional efforts to target small businesses and requests that CenterPoint Energy discuss what more it can do to target small businesses as defined by Minn. Stat. § 645.445.

III. Impacts of the OBBBA on NGIA Pilots

Both the Department and the OAG expressed interest in how federal legislative changes may impact CenterPoint Energy's pilots. The Company provides an overview below of how the OBBBA modifies relevant law and the Company's current expectations of impacts on its pilots. The Company notes that guidance from Treasury regarding start of construction dates for wind and solar facilities to access certain tax credits was published on August 15. The Company has conducted a preliminary review of how this guidance impacts its pilots, which is discussed in this filing. The published guidance indicates that further guidance related to foreign entities restrictions is under development, and the Company has not yet had time to analyze how that guidance may impact its pilots. The Company will provide an additional filing if any significant impacts are identified after further review of published and pending guidance.

RNG ITC

In its Petition,⁴ CenterPoint Energy identified that RNG producers participating in Pilots B (RNG Produced from Ramsey & Washington Counties Organic Waste) and C (Renewable Natural Gas RFP Purchase) might benefit from an ITC in 26 U.S.C. § 48. OBBBA does not modify section 48, therefore this is still accurate to CenterPoint Energy's knowledge.

Hydrogen Pilot Credits

In Reply Comments,⁵ CenterPoint Energy indicated that it believed that it would be eligible for a hydrogen production tax credit ("PTC") under 26 U.S.C. § 45V in relation to Pilot D (Green Hydrogen Blending into Natural Gas Distribution System). OBBBA modified Section 45V to terminate the credit for facilities that begin construction on or after January 1, 2028. CenterPoint Energy plans to commence construction of the facility before January 1, 2028 and therefore does not believe it will be affected by the recent law change.

In its Petition and Reply Comments, CenterPoint Energy indicated that it believed it would be eligible for an ITC associated with on-site solar to be installed to power the electrolyzer in relation to Pilot D. This credit is found in 26 U.S.C. § 48E. Section 48E was modified in several ways by OBBBA including by terminating the credit for wind and solar facilities that begin construction after July 4, 2026 and are placed into service after December 31, 2027. The

⁴ *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Petition (June 28, 2023).

⁵ *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan*, Docket No. G-008/M-23-215, Reply Comments (March 15, 2024).

Treasury Department provided guidance on August 15, 2025⁶ regarding when solar and wind facilities are considered to have started construction for Section 48E as modified by OBBBA. The OBBBA also places restrictions on “material assistance from prohibited foreign entities” which may restrict from what countries CenterPoint Energy may source components of its solar arrays. Further guidance has not yet been published to clarify these restrictions.

At this time, CenterPoint Energy anticipates constructing the solar array in advance of the OBBBA deadlines and being able to conform to the new foreign entity requirements. Based on a preliminary reading, the Company does not believe that the recent Treasury guidance will impact its ability to claim a Section 48E credit for the solar system. The Company will provide an update in this docket if its view on the recent guidance changes.

The Company also noted the potential availability of Section 45V credits for potential hydrogen participants in Pilot E (Industrial or Large Commercial Hydrogen and Carbon Capture Incentives). CenterPoint Energy’s customer identification and selection process is planned to provide participants with approximately 18 months to conduct a feasibility assessment and begin construction before January 1, 2028. Therefore, CenterPoint Energy does not believe participants’ eligibility for the PTC will be affected by the recent law change, however this will depend on the internal timelines for the customer-driven projects. If necessary, CenterPoint Energy will work with customers to explore options for expediting the selection process to provide additional security for meeting the deadline.

Carbon Capture Credits

In its Petition, CenterPoint Energy observed that carbon capture participants in Pilot E (Industrial or Large Commercial Hydrogen and Carbon Capture Incentives) might be eligible for credits under 26 U.S.C. § 45Q but also noted that the amount of carbon capture required for a credit might be too high for participating customers. The OBBBA made some modifications to Section 45Q, such as prohibiting specified foreign entities from claiming the credit, but the credit was not eliminated or modified in such a way as to make it significantly more or less likely that a participating customer might qualify.

Networked Geothermal Credit

In its Petition, CenterPoint Energy indicated that it would be eligible for an ITC under 26 U.S.C. 48E for Pilot I (New Networked Geothermal Systems). As noted above, OBBBA made changes to Section 48E. Since its Petition, CenterPoint Energy has determined that it may alternatively be eligible for an equivalent credit under 26 U.S.C. 48.⁷ OBBBA did not modify Section 48. Accordingly, CenterPoint Energy does not anticipate any impact to the amount of credit available as a result of the OBBBA. A similar analysis would apply to any participating customer

⁶ Beginning of Construction Requirements for Purposes of the Termination of Clean Electricity Production Credits and Clean Electricity Investment Credits for Applicable Facilities, Notice 2025-42, <https://www.irs.gov/pub/irs-drop/n-25-42.pdf>.

⁷ Section 48 has expired with respect to most technologies covered by the statute. However, a special provision allows geothermal systems such as the one to be constructed under Pilot I, to claim the credit until January 1, 2035. 26 U.S.C. 48(a)(3)(A)(vii). It might be possible in the alternative to claim a credit under Section 48E as described in the Petition, but a taxpayer cannot claim both credits. 26 U.S.C. § 48E(b)(3)(C)(vi).

projects that might otherwise qualify for a Section 48 credit under Pilots J (Decarbonizing Existing District Energy Systems) and K (New District Energy System).

Commercial Deduction

In its Petition, CenterPoint Energy noted that participating customer in Pilots J (Decarbonizing Existing District Energy Systems) and M (Commercial Hybrid Heating) might be eligible for a deduction under 26 U.S.C. § 179D. The OBBBA terminated the Section 179D deduction for property the construction of which begins after June 30, 2026. As described in the Petition, it was uncertain whether participants in these Pilots would qualify for the 179D deduction or not, so CenterPoint Energy does not anticipate significant impacts from the early termination of this tax benefit on its NGIA pilots.

Advanced Production Credits

In its Petition, CenterPoint Energy noted that participants in Pilots L (Industrial Electrification Incentives) and R (Industrial and Large Commercial GHG Audit) might be eligible for a credit under 26 U.S.C. 48C. OBBBA made a minor modification to Section 48C⁸ but does not make it significantly more or less likely that a participating customer may qualify for the credit.

Industrial IRA and IIJA Grant Programs

In its Petition, CenterPoint Energy noted that participants in Pilots L (Industrial Electrification Incentives) and R (Industrial and Large Commercial GHG Audit) might be eligible for grants under the Inflation Reduction Act (“IRA”)⁹ § 50161 or the Infrastructure Investment and Jobs Act (“IIJA”)¹⁰ §§ 40521 or 41008. OBBBA rescinded the unobligated amounts available under IRA § 50161 but did not change the programs under IIJA §§ 40521 or 41008. Given that it was uncertain whether participating customers would be eligible for IRA § 50161 or that they would apply for and win a grant created under that Section, the Company does not anticipate this legal change will have much of an impact on Pilots L or R.

Residential Efficiency Credit

In its Petition, CenterPoint Energy explained that participants in Pilot N (Residential Deep Energy Retrofits and Electric Air Source Heat Pumps), Phase 3 might be eligible for a tax credit under 26 U.S.C. § 25D. OBBBA terminated this credit for expenditures made after December 31, 2025, by which time Phase 3 will not have launched. OBBBA’s change may discourage some participants from participating in Pilot N, however, CenterPoint Energy does not believe that it is necessary at this time to reduce participation estimates described in the Petition.

HOMES and HEAR Rebates

In its Petition, CenterPoint Energy noted that participants in Pilot N (Residential Deep Energy Retrofits and Electric Air Source Heat Pumps), Phase 3, may be eligible for rebates under IRA §§ 50121 and/or 50122, Home Energy Performance-Based Whole Home Rebates (“HOMES”) and High-Efficiency Electric Home Rebate Program (“HEAR”), respectively. OBBBA did not

⁸ The modification relates to situations where a project has been certified by the Secretary of the Treasury as eligible for the credit, but that certification is later revoked.

⁹ H.R. 5376 (2022), Pub. L. No. 117-169.

¹⁰ H.R. 3684 (2021), Pub. L. No. 117-58.

rescind funding for these programs. Accordingly, it is still CenterPoint Energy's expectation that Pilot N participants may qualify for these rebate funds.

IV. Response to the Department

The Company appreciates the Department's analysis and conclusion that the Commission should accept the Report, approve the Company's proposed Innovation Act Adjustment ("IAA") rate, and approve the Company's proposed bill message regarding the IAA rate change. Below the Company responds to the Department's requests for additional information and their IAA recommendation.

a. Definition of Diverse Vendors

The Department requested that the Company explain in reply comments how the Company defines diverse vendors and determines whether a vendor satisfies the definition.

CenterPoint Energy is required to file a Utility Diversity Report annually,¹¹ which includes actual spending for female-owned, minority-owned, veteran-owned, and small business enterprises during the previous calendar. The Company's definition for diverse vendors in NGIA will follow the same criteria, where the vendor must be certified by a third-party such as the Small Business Administration, the Women's Business Enterprise National Council, the National Minority Supplier Development Council, or the National Veteran-Owned Business Association. The Company will include additional qualitative vendor information, as available, for diversity impact of non-certified organizations, for example due to non-profit or governmental status.

b. Success in Obtaining ITCs

The Department requested that the Company provide information on the success of obtaining ITCs for RNG projects and any information the Company has on the estimated impacts to the costs for the Company and ratepayers of those ITCs in future annual reports. The Company has no objection to this request and will provide the information in future annual reports.

c. Information on Impacts of Federal Law and Tax Policy Changes

The Department requested that the Company provide further updates on the impacts of federal law and tax policy changes on its NGIA pilot programs as the Company learns of changes. The Company has no objections to this request and will provide updates on pertinent federal law and tax policy changes as it learns of them. Above, the Company has provided its current understanding of the impacts of OBBBA on its pilots.

d. Recommendation on IAA filing

The Department recommended that the Commission require the Company to make future IAA change requests in a separate filing rather than in the same filing as annual reports in order to reduce administrative delays in setting IAA rates. The Department noted benefits and risks to this approach but felt that, on balance, it was better to handle the IAA change requests separately and more quickly than annual reports can be evaluated.

¹¹ Minn. Stat. § 216C.51.

The Company is supportive of filing IAA change requests separately but wishes to clarify its understanding that if the Commission were to adopt this recommendation, the Company would continue to file IAA change requests annually, on June 1, concurrently with NGIA annual reports and that those requests for IAA modification would reflect the prior calendar year of NGIA activity.¹² The Company would also continue to file IAA requests in this docket, as opposed to a separate docket, for the duration of the current NGIA plan cycle. While the Company does not object to this change in process, and agrees with the Department that it has some potential advantages, the change in process may create additional work for the Commission, the Department, and other parties by doubling the number of filings that the Commission must evaluate each year as part of the NGIA process.

V. Response to the OAG

Below the Company responds to the OAG's concerns and requests for additional information.

a. Concerns and Questions Related to Pilot D

As noted by the OAG and further described above, the OBBBA modified previous law to terminate the hydrogen production PTC and solar electricity ITC more quickly than they would have otherwise been terminated. In order to receive value of both credits, CenterPoint Energy must (1) either begin construction of the solar array before July 4, 2026 or place the solar array into service on or before December 31, 2027; and (2) commence construction on the hydrogen production facility before January 1, 2028. The Company must also navigate the new restrictions on material assistance from prohibited foreign entities to obtain the full credit for the solar array.

The OAG requested that the Company

- Assess the potential impacts of OBBBA on the estimated tax benefits in Pilot D and describe what steps the Company will take to mitigate these potential impacts and receive the full tax benefits estimated;
- Provide more specific information on how it determined its beginning of construction and in-service estimates, and how the Company plans to ensure that those dates are not delayed; and
- Address how the Company will conduct meaningful community engagement on the timeline that will be required to earn the contemplated federal tax credits before they expire.

CenterPoint Energy has confidence in its ability to meet the timelines established by the new law and to execute meaningful engagement with the City of Mankato as it works to develop the project. Regarding the project schedule, CenterPoint Energy staff leveraged previous experience from the development and operation of the Minneapolis hydrogen facility to create schedule estimates in line with past experience. CenterPoint Energy additionally contracted with Standby Systems, Inc. to produce a Front-End Engineering Design ("FEED") study, which included the development of an estimated schedule for the project. Given the preliminary nature of the design, specific beginning of construction and in-service dates have not yet been

¹² In the event that the Commission modifies the amount of recoverable expense in its evaluation of the NGIA annual report, that could require follow up filings to modify the IAA.

determined. However, to ensure these dates remain within the OBBBA timeline, CenterPoint Energy has taken proactive steps such as early engagement of contractors.

Regarding engagement with the City of Mankato, CenterPoint Energy plans to meet with relevant city staff in early September to provide an overview of the preliminary plan for the Pilot and solicit feedback from city staff. CenterPoint Energy is committed to working with further stakeholders throughout the development of the Pilot, including city officials, local and state permitting agencies, and local emergency officials. The Company plans to work and consult with various, relevant stakeholders to garner their feedback and provide those stakeholders with Pilot updates throughout the project. CenterPoint remains committed to conducting engagement aligned with the standards of agencies and jurisdictions with purview over the Pilot throughout planning, construction and operation.

With respect to requirements relating to material assistance from prohibited foreign entities. CenterPoint Energy will continue to monitor additional Treasury guidance as it is provided, and will endeavor to satisfy the new foreign entity restrictions if reasonably practicable in order to maximize IRA benefits for customers' benefit.

The OAG requested that CenterPoint Energy file a notification in this docket if the Company's beginning-of-construction or in-service dates for either the solar array or the electrolyzer are delayed in any way. The Company has no objection to filing a notification in the docket if it appears that it may materially slip from the estimated timeline or if it believes a delay may risk its eligibility for the tax credits.

b. Questions Related to Pilot M

The OAG requested that the Company explain its plans to ensure its selected vendors will have sufficient experience with small businesses in environmental justice areas so they will benefit from Pilot M.

The vendor chosen to deliver this pilot is the Center for Energy and Environment ("CEE"). In the course of their history, CEE has extensive experience delivering energy efficiency programs to small businesses as well as to customers in environmental justice areas. A recent example includes delivering an energy savings consulting service to commercial customers of an electric utility. Part of the consulting service is tailored specifically to small and medium-sized businesses. In addition, CEE has delivered programs to customers in Minneapolis' Green Zones as well as areas highlighted in the Minnesota Pollution Control Agency's environmental justice area map.

c. Questions Related to Pilot O

Regarding Pilot O, the OAG asserts that the Pilot is not sufficiently targeting "small business" as intended by the legislature. The OAG opines that the Company must make additional efforts to target small businesses and requests that CenterPoint Energy discuss what more it can do to target small businesses as defined by Minn. Stat. § 645.445.

CenterPoint Energy first notes that Pilot O is intended to provide opportunities for "small- and medium-sized businesses," [emphasis added] as required by the NGIA statute. CenterPoint Energy did not intend the Pilot to focus narrowly on small businesses as defined by Minn. Stat. § 645.445 and lacks the data to determine which businesses satisfy those statutory criteria. For

example, the Company does not ordinarily know how many employees its customers have, who customers may be affiliated with, or what annual gross revenue they might have obtained in prior years. The Company would also oppose requirements for it to request this information from customers, as it would unnecessarily complicate Pilot implementation, especially given that businesses that do not qualify as “small businesses” would still be eligible to participate in the Pilot.

However, the Company is committed to ensuring that its marketing efforts and Pilot implementation are inclusive of small businesses. As part of this commitment, the Company will create a dedicated marketing campaign for small businesses that encourages participation in the pilot by explaining the benefits of a combined energy efficiency and decarbonization audit.

VI. Conclusion and Recommendations

The Company thanks the Commission for consideration of these Reply Comments. The Company respectfully requests that the Commission approve the Company’s Report, the proposed IAA rates, and its proposed bill message.

In the Matter a Petition by CenterPoint Energy Minnesota Gas for Approval of its First Natural Gas Innovation Act Plan – Annual Report	Docket No. G-008/M-23-215
	REPLY COMMENTS

CERTIFICATE OF SERVICE

I, Christina Benning, certify that on Wednesday, August 27, 2025, I served the attached Reply Comments of CenterPoint Energy on the attached service list for Docket No. G-008/M-23-215. The filing was delivered electronically or, if indicated on the attached service list, placed in the U.S. Mail at Minneapolis, Minnesota.

/s/ Christina Benning
Senior Regulatory Paralegal
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57	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	23-215Official

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62	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	23-215Official
63	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	23-215Official
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65	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23-215Official
66	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
67	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	23-215Official
68	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
69	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official
70	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	23-215Official
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88	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	23-215Official
89	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	23-215Official
90	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	23-215Official
91	Ana Sophia	Mifsud	amifsud@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-215Official
92	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-215Official
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95	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	23-215Official
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97	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
98	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
99	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	23-215Official
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102	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	23-215Official
103	Carol A.	Overland	overland@legalelectric.org	Legaletric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-215Official
104	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official
105	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	23-215Official
106	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	23-215Official
107	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	23-215Official
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111	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-215Official
112	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul MN, 55102 United States	Electronic Service		No	23-215Official
113	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	23-215Official
114	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental		26 E Exchange St,	Electronic Service		No	23-215Official

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