



September 9, 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 of a Commission Evaluation of Changes to Natural Gas Utility
Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction
Goals**

Docket No. G999/CI-21-565

SUPPLEMENTAL REPLY COMMENTS

Dear Mr. Bull:

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits the following supplemental reply comments in response to comments filed by various parties regarding the Minnesota Public Utilities Commission's ("Commission") Notice of Comment Period ("Notice") issued May 5, 2025. In its Notice, the Commission requests comment on what actions, if any, should the Commission take to modify existing gas line extension policies for rate regulated gas utilities, and included the following topics open for comment.

If you have questions, please contact us at Emily.Suppes@centerpointenergy.com or 612-321-5363 and Seth.DeMerritt@centerpointenergy.com or 612-321-4423.

Sincerely,

/s/ Emily Suppes

Director, Regulatory

/s/ Seth DeMerritt

Manager, Regulatory & Rates

Attachments

C: Service List

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

Katie Sieben	Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of a Commission Evaluation
of Changes to Natural Gas Utility
Regulatory and Policy Structures to Meet
State Greenhouse Gas Reduction Goals

Docket No. G999/CI-21-565

**CENTERPOINT ENERGY'S
SUPPLEMENTAL REPLY COMMENTS
IN RESPONSE TO THE MINNESOTA
PUBLIC UTILITIES
COMMISSION'S MAY 5, 2025, NOTICE**

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits the following supplemental reply comments in response to comments filed by various parties regarding the Minnesota Public Utilities Commission's ("Commission") Notice of Comment Period ("Notice") issued May 5, 2025. In its Notice, the Commission requests comment on what actions, if any, should the Commission take to modify existing gas line extension policies for rate regulated gas utilities.

Utilities have stated they support fuel-neutral energy policy that maintains Minnesota's place as a national leader in safe, reliable, efficient, and affordable energy for all customers and see line extension policies as enabling access to use available energy systems that prioritize customer's energy choices and needs to heat their homes and power their businesses, while encouraging affordability for housing and business development. Over the last 40 years, line extensions have been a consistent tool for Minnesotans to access readily available and cost-effective energy, and CenterPoint Energy strongly believes they should continue to remain a consistent tool for a reliable, readily available cost-effective energy source as well as decarbonization pathways

through utility energy efficiency and innovation programs. Decisions made regarding line extension policy will play a pivotal role in access to reliable, efficient, and affordable home heating during Minnesota’s harsh winters, while working to maintain lower home and business costs for Minnesotans.

There are very different perspectives on what the energy future looks like in this docket. In each of our own way, each party is advocating for reducing energy burden on customers, which is a consistent shared goal amongst all parties in the regulatory space. Line extension policies conform to the regulatory compact and benefits all users of the system. CenterPoint Energy is supportive of maintaining line extension policies at the current levels at the request of parties that are currently using them¹², while incorporating Commission direction in how utilities will calculate them in future rate case filings.

Line extension policy impacts Minnesota housing affordability and energy access

CenterPoint Energy is concerned with parties’ sentiments that line extension policy is not housing policy.³ Line extension policies enable access to natural gas for the equipment in customers’ homes that they depend on throughout the year. They impact the affordability in both the cost of the home and the operational costs of these systems as considerations when purchasing a home or for their existing homes. When discussing impacts to customer affordability and energy access for their homes, the Company challenges the notion customers would likely not see the difference between “housing” and their “home.” The Company recognizes that it is not the most sought-after voice in this docket but instead is looking to highlight the real consequences and impacts of this policy decision from the impacted parties. CenterPoint Energy appreciates the many perspectives provided in this docket and the additional participation on a critical issue.

To that point, CenterPoint Energy supports Housing First’s sentiments in their August 11th, 2025, reply comments that housing impacts cannot be ignored, acknowledging the clear connection between infrastructure costs and project feasibility.⁴ Noting their additional concern that “removing these allowances will raise per-unit housing costs, undermine project viability, and exacerbate the existing shortage of attainable homes.” This point is further built out by Minnesota Multi Housing Association (“MHA”)’s concern that eliminating the allowance would shift substantial costs onto new rental projects,

¹ Dkt. G999/CI-21-565. Coalition of Greater Minnesota Cities (“CGMC”) [Reply Comments](#), pg. 4

² Dkt. G999/CI-21-565. Housing First Minnesota [Reply Comments](#), pg. 3

³ Dkt. G999/CI-21-565. Fresh Energy and Minnesota Center for Environmental Advocacy (“MCEA”) [Reply Comments](#), pg. 1

⁴ Dkt. G999/CI-21-565. Housing First Minnesota [Reply Comments](#), pg. 1

undermining efforts to address our 100,000 unit state-wide housing shortage and could hinder the development of much-needed rental properties.⁵

CenterPoint Energy encourages the Commission to recognize MHA's notion that:

Gas line extension allowances function as an important housing affordability policy. They are a form of cost-sharing that has helped produce more housing across Minnesota by lowering upfront barriers. [...] This is especially critical now, when the state's housing shortage is acute and broad consensus exists that we need to build more housing at all price points. By maintaining the allowance, the Commission would support continued housing development and send a message that energy policy will be balanced with housing affordability needs.⁶

The Company also appreciates parties providing the community perspective in this docket, because their experiences provide current context to concerning impacts of this policy discussion. The Coalition of Greater Minnesota Cities ("CGMC") articulated in their August 6th reply comments⁷ that:

Pushing the cost of natural gas line extensions onto developers or individual homeowners will, at a minimum, drive up the cost of housing even further. In Greater Minnesota, it will become even more challenging, if not impossible, to get desperately needed housing built. Many rural cities already have difficulty attracting developers to build in their cities because those developers can earn much more building in the Twin Cities metropolitan area or the very largest cities outside the metropolitan area. Adding to the cost of construction when the local market cannot support the additional housing unit price increase means that much-needed additional housing will not get built.

CenterPoint Energy also shares the same concern with CGMC and Laborers' International Union of North America ("LIUNA")⁸ that using the elimination of line extension policy as a price signal to encourage electrification policy change is a risk, which also, consequently, is an outcome not substantiated by any data provided in this docket.

In Sherburne County's September 2nd, 2025, letter⁹ in this docket, the Company notes their concerns regarding the estimated 18.5% of the County households and 41% of renter households are currently cost burdened. Additionally, that:

⁵ Dkt. G999/CI-21-565. Minnesota Multi Housing Association ("MHA") [Comments](#)

⁶ Dkt. G999/CI-21-565. Minnesota Multi Housing Association ("MHA") [Comments](#), pg. 3

⁷ Dkt. G999/CI-21-565. CGMC [Reply Comments](#), pg. 2

⁸ Dkt. G999/CI-21-565. Laborers' International Union of North America ("LIUNA") [Reply Comments](#), pg. 4

⁹ Dkt. G999/CI-21-565. Sherburne County [Letter](#)

Any changes in policy which reduce natural gas availability or increase natural gas cost will have a direct and negative impact on Sherburne County's residents, only raising the number of cost-burdened households. Sherburne County's median for-sale price for homes is now at an all-time high of \$375,000. The elimination of the natural gas line extension policy would only raise the price of new homes going onto the market.

The Company values that communities are looking to natural gas utilities and line extension policies as a tool to access energy that is often more readily available to metropolitan areas. These policies help mitigate construction costs to reduce strain on housing options and affordability¹⁰.

MHA raises further inequality concerns for Greater Minnesota, noting rural residents "generally prefer to have access to natural gas – which is typically cheaper per BTU and more convenient."¹¹ Their concern that a practical consequence of this policy change could then "undermine both affordability and environmental goals." "Ironically, a policy meant to reduce reliance on gas could force rural residents onto propane – a fossil fuel that generally emits more CO₂ per unit of heat than natural gas and is delivered by truck."¹²

In all of these comments, neither Housing First nor CGMC nor Sherburne County nor MHA stated that these changes would definitively change the energy choices for all their residents or members towards the full electrification policy parties are correlating as an outcome.¹³ Instead, the a fore mentioned parties note support of natural gas:

Natural gas is currently the backbone of affordable and effective heating in Minnesota. Abruptly disincentivizing new gas use by eliminating line extension allowances is not a silver bullet for climate change – it is a one-dimensional solution that risks collateral damage in housing affordability and community development.¹⁴

They also claim that this change would "exacerbate our housing problems by increasing the cost of infrastructure and construction,"¹⁵ implying that these entities will still be looking to choose to join the natural gas system. CGMC's comments are made stronger with the Center for Energy and Environment ("CEE")'s observation that "Minnesota is

¹⁰ Dkt. G999/CI-21-565. Sherburne County [Letter](#), pg. 2

¹¹ Dkt. G999/CI-21-565. MHA [Comments](#), pg. 3

¹² Dkt. G999/CI-21-565. MHA [Comments](#), pg. 4

¹³ MHA Page 4 notes, " All-electric new construction can work for some building types, but often electric resistance heating or even heat pumps in very cold areas lead to higher monthly energy bills for consumers compared to high-efficiency natural gas heating."

¹⁴ Dkt. G999/CI-21-565. MHA [Comments](#), pg. 6

¹⁵ Dkt. G999/CI-21-565. CGMC [Reply Comments](#), pg. 2

not yet at a point of cost-parity for all-electric homes in the new construction built-to-code market from a first-year operational cost perspective, compared to homes with standard gas appliances and central air conditioning units.¹⁶

Line extension policies increase Minnesota's economic competitiveness

CenterPoint Energy agrees with parties concerned that removing line extension policies will negatively impact the state's economic development.

Our cities along Minnesota's borders often compete with cities in the Dakotas and Iowa when businesses are looking to build or expand. Placing the entire cost of line extensions on a business is another cost driver that could result in that business locating across the border. When that happens, Greater Minnesota loses out on economic growth with no benefit to the climate because the business will likely still rely on natural gas, just in a different state.¹⁷

Minnesota Grocers Association ("MGA") noted similar sentiments, stating that their energy-intensive members view the immediate impact of eliminating line extension allowances would be to create a barrier to market entry for all but the largest big-box retailers.¹⁸ As well as growing concerns from Minnesota Biofuels Association ("MBA"), Minnesota Corn Growers Association ("MCGA"), and the Minnesota Farm Bureau Federation ("MFBF") for their members who rely on natural gas for industrial processing, grain drying, and other critical needs.¹⁹ CenterPoint Energy appreciates the work these industries provide to the state and the role the Company plays to provide "reliable, affordable, and safe heating to many of their members" and "predictable, stable, and equitable access to this necessary energy resource."

Additionally, there is overwhelming support from labor unions on the role of the natural gas system in the energy transition and the need to balance safety, reliability, affordability, and economic development with emissions goals in policy decisions evaluating the need for natural gas infrastructure.²⁰ The Minnesota Pipe Trades Association comprised of 11 local unions across the state, International Union of Operating Engineers Local 49 ("IUOE Local 49"), and the International Brotherhood of Electrical Workers ("IBEW") join LIUNA in their support for maintaining²¹, and even increasing, line extension policies to reduce housing construction costs and make

¹⁶ Dkt. G999/CI-21-565. Center for Energy and Environment ("CEE") [Reply Comments](#), pg. 4

¹⁷ Dkt. G999/CI-21-565. CGMC [Reply Comments](#), pg. 3

¹⁸ Dkt. G999/CI-21-565. Minnesota Grocers Association ("MGA") [Comments](#)

¹⁹ Dkt. G999/CI-21-565. Minnesota Biofuels Association (MBA), Minnesota Corn Growers Association (MCGA), and the Minnesota Farm Bureau Federation (MFBF) [Letter](#)

²⁰ Dkt. G999/CI-21-565. International Brotherhood of Electrical Workers ("IBEW") [Comments](#) pg. 2

²¹ Dkt. G999/CI-21-565. International Union of Operating Engineers (IUOE Local 49) [Reply Comments](#), pg. 3

Minnesota more attractive for business development.²² CenterPoint Energy again appreciates the perspective of the trades for the work they do to build and maintain the state's natural gas infrastructure and the "impact it has on their members and the millions of Minnesotans who depend on that infrastructure every day for the reliable and affordable delivery of essential utility services to heat their homes, run their appliances, and power their businesses."²³

Outstanding Items in Economic Modeling

CenterPoint Energy agrees with the OAG's concern that "it will be too difficult to determine an accurate estimate of future statutory compliance costs."²⁴ Since there are not current externalities costs for statutory compliance for line extension policies, so estimating these values would be arbitrary and inaccurate. The Company does not support incorporating these types of externality costs in line extension modeling.

CenterPoint Energy also agrees with the OAG's conclusion:

To accurately represent the length of time until a new customer begins to economically benefit the system, it is important for the extension allowance justification to use the same period over which the capital costs are depreciated as is used in utility rates. For that reason, the OAG does not agree with the Javelina Report that the depreciation period should be over 25-years to match the 2050 net-zero goal. Instead, the depreciation period in the extension allowance justification should match the most recent depreciation certification authorized by the Commission for those assets.²⁵

The OAG remains supportive of utilities' extension allowance justifications including all costs to extend and provide service to new customers in and only reasonable estimates of new customer revenues.²⁶ The Company understands the OAG's perspective in incorporating additional costs to reflect an updated customer contribution for projects where the total estimated footage is greater than the allowable footage amount.

In CUB's Reply comments,²⁷ they detail the different understandings of recovery of extension costs.

²² Dkt. G999/CI-21-565. Minnesota Pipe Trades Association [Reply Comments](#), pg. 2

²³ Dkt. G999/CI-21-565. International Union of Operating Engineers (IUOE Local 49) [Reply Comments](#), pg. 1

²⁴ Dkt. G999/CI-21-565. OAG [Reply Comments](#), pg. 6

²⁵ Dkt. G999/CI-21-565. OAG [Reply Comments](#), pg. 7

²⁶ *Id.*

²⁷ Dkt. G999/CI-21-565. Citizens Utility Board of Minnesota ("CUB") [Reply Comments](#), pg. 6

CenterPoint also explains that its “extension tariff is structured to provide recovery of extension costs, via revenue from new customers, within a five-year period.” **CUB understands these statements to indicate that 1) existing customers begin to see benefits in the beginning of the fifth year after installation; and 2) revenue from new customers provides recovery of extension costs within a five-year period.** However, analysis presented in initial comments by OAG shows that customers do not begin to see an actual benefit until 13 years after installation of the asset, and that full recovery of extension costs do not happen until **18 years—or as CUB argues possibly 28 years**—after the extension is made. [...] “Total Revenue Requirement” (line 20) shows the full annual costs resulting from the new customer addition over the study period. The total amount of those costs across the model’s 39-year study period are not recovered until 28 years after the initial investment. Thus, the full costs of a new customer addition would not be recovered until the 28th year after the extension was made.

It is important to note that in any of these definitions of payback periods providing benefits to current customers, adding new customers to the system absolutely benefits the existing customers within the life of the project. Even in CUB’s argument that it takes 28 years for new customers to cover the true cost of their addition, that leaves 11 years of the life of the assets where the new customers provide benefit to existing customers of over \$4,500. Whether or not the Commission determines that utilities should focus on the first year of when new customer revenues begin exceeding the project costs, or calculate the benefit to customers using a NPV calculation, there is no argument that new customers are not benefiting the overall system. Ultimately, the calculation of the costs should include the pre-tax cost of capital on the cost of the meter, service, and main not covered by the new customer CIAC, and the depreciation and property tax expenses of those assets, offset by the inclusion of deferred taxes.

CEE Recommendation for Single-family new construction Energy Conservation and Optimization (“ECO”) program

Building on the Company’s response²⁸ to CEE’s proposed ECO New Home Program Recommendations,²⁹ CenterPoint Energy has continued conversations with parties to look for potential modifications. A compromise position has not been determined as of this filing, but the Company is optimistic of finding resolution prior to the Commission hearing on this topic.

²⁸ Dkt. G999/CI-21-565. CenterPoint Energy (“CNP”) [Reply Comments](#), pg. 10

²⁹ Dkt. G999/CI-21-565. CEE [Initial Comments](#), pg. 15

Firstly, the Company's understanding of this proposed ECO New Home Program update would not mandate all customers utilizing line extension policies to participate in the modified ECO New Home Program; but more so to recommend a modified ECO program to the suite of ECO options that customers may participate in, if they so choose. CenterPoint Energy clarified with CEE that this is their intention of their proposal, so the following is based on that understanding.

CenterPoint Energy continues to find concern with the proposed *natural gas* utilities' ECO New Home Programs determining which *electric* appliances customers would need to install to be eligible for the program.³⁰ (Emphasis added.) The Company holds a similar position on this matter in the ongoing Technical Reference Manual ("TRM") v5.0 update meetings hosted by the Department of Commerce ("Department")³¹, discussing removing central air conditioners as an efficient option in Residential HVAC- Efficient Air Conditioning System measure. This update would end incentives within the ECO Programs for above-code central air conditioning units.³² While this measure pertains to customer choices for electric equipment, CenterPoint Energy has concerns regarding the policy precedent of this update effectively requiring the phase out of equipment that qualifies as cost-effective and energy efficient. Removal of equipment measures via the TRM is rare and in the past energy efficient equipment has been phased out based on changes in codes and standards or market availability. Neither case applies to AC systems. The Company requests the Commission delay decision on this policy item until there is further determination in the TRM Advisory Committee, as there are similar concerns from other parties that are also being considered through this process that may not be represented in this regulatory record.

As the only Minnesota gas-only utility to currently provide Efficient Fuel Switching ("EFS") ASHP measures in our new construction programs: High-Efficiency Homes and New Home Construction Rebates programs³³, it's important to note that CenterPoint Energy is not opposing ASHP rebates for our customers and understands CEE's goal to develop and build out the ASHP market in their recommendation. The Company does not agree with CEE that the market is at the point where requiring only ASHP installation as part of the program would have the intended effect that CEE is hopeful of and has not built a record that it would. Based on trade ally feedback and current installation data, CenterPoint Energy is concerned this policy approach would harm Minnesota's energy efficiency performance and expects the likely outcome could be potential customer backsliding to less efficient options if the barrier to participate in

³⁰ CEE's Initial Comments, Page 15: Require installation of an ASHP in lieu of a central air conditioner (CAC) to be eligible for the program.

³¹ [Minnesota Department of Commerce - Energy, Technical Reference Manual](#)

³² [Minnesota TRM 5.0 Update Meeting 4 Slide Deck](#), pg. 9

³³ Dkt. G-008/CIP-23-95. CNP 2024-2026 ECO Triennial: EFS measures began in these programs in 2024.

these programs are too high. This further supports the Company's concern of this proposed program requirement being too stringent on ASHP installation. There are modified potential approaches to provide additional bonus rebates to further incentivize ASHP's or proposing a "ramped" up program proposal timeline that could help alleviate CenterPoint Energy's concern with the New Home Program proposal.

Finally, the Company continues to have concern that program participation may be impacted if a 10% energy savings requirement to the Company's existing High-Efficiency Home program is mandated through this docket after residential building codes have been updated. Minnesota building codes are already making progress towards incrementally achieving 70 percent reduction in annual net energy consumption by 2038,³⁴ and requiring a static 10% above code requirement through this docket does not provide flexibility that the utilities count on to implement programs to further encourage above-code energy efficiency incentives in dynamic and evolving markets. Again, the Company is supportive of the overall goal of CEE's proposal to encourage additional energy efficiency, however, does not support a static requirement without the option of flexibility to innovate, if needed.

If the Commission decides to require CEE's proposed ECO program update for gas utilities to be allowed to maintain providing line extension policies to customers, the Company requests a potential compromise that this be a one-time requirement to be filed in the gas utilities' 2027-2029 triennial plans,³⁵ with modifications to the requirements. Moving forward, this one-time requirement would provide the Department, gas utilities, and additional stakeholders the opportunity to provide modifications through their subsequent ECO filings to account for program learnings and the potential for changing circumstances.

CenterPoint Energy's Estimated Total Annual Bill for Equivalent Usage of Energy Options Table

CenterPoint Energy also recognizes CUB's criticism of the simple calculation that the Company provided in its initial comments³⁶.

However, CenterPoint's "simple calculation" does not consider variables like equipment type and only looks at a one-to-one comparison of electricity needed to make up an equivalent amount of natural gas per therm. Significant differences in operational efficiency for air source heat pumps ("ASHPs") compared with other forms of heating cannot be overlooked in understanding

³⁴ [Sec. 326B.106 MN Statutes](#) (g)

³⁵ Filing is June 1, 2026, or as directed by the Department.

³⁶ Dkt. G999/CI-21-565. CNP [Initial Comments](#), pg. 5

these impacts and equipment type across all fuels plays an undisputed role in determining energy usage. CUB therefore finds little to no value in the data presented by CenterPoint, as it fails to capture even a close approximation of what customers' bills may look like under different energy options.³⁷

The Company agrees with CUB that there are much more complex calculations that can be completed evaluating many varied estimated factors, but also notes, that sometimes “simple” can be helpful too. It is disconcerting that the feedback on this calculation is only viewed through the lens of electrification by CUB, since Minnesota residents currently have broader concerns related to costs and environmental impacts of delivered fuels as their primary heating source, which appear to be overlooked in their response. The Company notes similar customer conditions between gas-propane and fuel oil equipment, to address CUB’s concern of equipment type as an outstanding factor in the calculation. In addition, the resulting equivalent energy usages provided in the table for propane and fuel oil were around the national average.³⁸ CenterPoint Energy agrees with CUB that air source heat pumps (“ASHPs”) could impact the customer energy usage; but again, to their point, equipment types across all fuels used affect energy usage, electric equipment included. The Company did not include an estimated usage between ASHP vs. electric baseboard heating in the simple calculation, nor different equipment types across the remaining fuel sources, for that reason.

Additional natural gas utility stakeholder engagement

CUB recommended the Commission request the Great Plains Institute (“GPI”) engage with the Gas Utility Innovation Roundtable to consider “what decarbonization benchmarks the gas utility sector must meet in order to enable the state to reach its statutory net zero goal, and that GPI report its process and conclusions to the Commission.” The OAG deferred to GPI on whether it has the resources or interest in taking on this endeavor.³⁹

CenterPoint Energy continues to support advancing the state’s energy goals yet believes the existing legislative direction does not justify the direction that CUB proposes. The Company restates its consistent position that the statutory 2050 net zero goal is an economy-wide goal, which does not specify specific industries and calls upon several state agencies in considering this statute goal, including: Pollution Control

³⁷ Dkt. G999/CI-21-565. CUB [Reply Comments](#), pg. 12

³⁸ EIA Annual household site fuel consumption, pg. 5

<https://www.eia.gov/consumption/residential/data/2020/state/pdf/State%20consumption.pdf>

³⁹ Dkt. G999/CI-21-565. OAG [Reply Comments](#), pg. 12

Agency, the Housing Finance Agency, the Departments of Natural Resources, Agriculture, Employment and Economic Development, and Transportation. CenterPoint Energy continues to strive to reduce our own emissions with a Net Zero goal of 2035⁴⁰ for carbon emissions directly attributable to operations and facilities across the Company's electric, natural gas and power generation businesses.⁴¹ Admittedly at a smaller scale, yet similarly to how the state legislature is looking holistically at net zero goals across the state economy, the Company is looking holistically at net-zero goals across the entire business footprint.

Additionally, CenterPoint Energy's Minnesota gas utility business is year-after-year exceeding ECO energy savings goals and supporting innovation and additional decarbonization strategies through the Company's Natural Gas Innovation Plan.⁴² There are still many decarbonization conversations that are taking place to encourage further advancement of the state's goals in existing regulatory structures, so the Company does not envision meaningful additional information to be learned from the engagement as proposed by CUB.

If the Commission decides to move forward with requiring coordination in the Gas Utility Innovation Roundtable, the Company requests Commission direction on meeting topics, the envisioned timeline, and preferred deliverables for discussion. The Gas Utility Innovation Roundtable has been meeting monthly, since its origination to discuss the now-completed gas utility integrated resource planning regulatory framework, totaling 26 meetings to date.⁴³ The Company views Commission direction as an imperative step to inform the vision of these discussions since there is not legislative direction. Additionally, would like to understand if the Commission views this stakeholder group as eligible for intervenor compensation. It would be helpful for budgeting purposes, if parties eligible could then provide estimated costs based on the Commission direction.

Customer safety is core to CenterPoint Energy's values

Lastly, parties have stated Minnesotans health concerns in their considerations for eliminating line extension policies.

Parties explained that natural gas end use appliances like stoves, ovens, furnaces, and water heaters lead to the release of nitrogen dioxide (NO₂), carbon

⁴⁰ CenterPoint Energy Carbon Policy. [2023-Carbon-Policy-Handout.pdf](#)

⁴¹ [Energy Transition Goals - CenterPoint Energy Sustainability](#). The Company notes with the retirement of Brown Units 1 and 2 and Culley Unit 2 in Indiana, and exiting operations at Warrick unit 4, we expect to see a 60% reduction in emissions of carbon by 2026.

⁴² Dkt. G-008/M-23-215. CNP NGIA Filing

⁴³ The Company notes that there have been meeting cancellations in recent months. The monthly cadence is provided as sense of scale based on the preferred cadence of the group.

monoxide (CO), fine particulate matter (PM2.5), formaldehyde, and other pollutants in households. They also identify that exposure to these chemicals can cause significant health impacts, including higher risks of asthma and increases in associated higher rates of nighttime inhaler use, wheezing, and airflow obstruction, as well as aggravating impacts of heart disease and ocular damage.⁴⁴

CenterPoint Energy's top core value is safety, and this drives the actions that the Company takes to help keep its employees and members of the public safe. As the largest natural gas utility in Minnesota, CenterPoint Energy understands its role in promoting practices to keep its customers and community members safety and healthy.

The Company regularly offers customers tips on using natural gas safely, highlighting the importance of appliance maintenance by a qualified professional, and offering tips on how to cook safely. CenterPoint Energy understands that certain customers from underserved communities may have barriers to implementing some of those actions; therefore, the Company also offers several free or low-cost and easy-to-implement safety tips for customers.

CenterPoint Energy appreciates the passion and care intervening parties have for the health of Minnesotans, especially those from underserved communities. However, the Company's understanding of the research and science on the impact of gas stoves on indoor air quality leads it to a different conclusion than certain intervening parties.

Studies consistently show that the results of the cooking process, such as grease, smoke and steam, are the primary source of concern about indoor air quality related to particulate matter and volatile organic compounds. CenterPoint Energy encourages customers and anybody who cooks, regardless of fuel type of their stove, to maintain ventilation through hood vents or air purification systems to mitigate exposure to the byproducts of cooking.

According to a World Health Organization study published in *The Lancet*⁴⁵, using natural gas for heating and cooking is not associated with asthma in children or adults.

For asthma, no significant increase in risk for children and adults was found for use of gas compared with electricity...⁴⁶

⁴⁴ Dkt. G999/CI-21-565. CUB [Reply Comments](#), pg. 10

⁴⁵ <https://www.thelancet.com/action/showPdf?pii=S2213-2600%2823%2900427-7>

⁴⁶ (Puzzolo et al, p. 290)

The study expands on caution needed when understanding data reported on natural gas use, especially, when understanding differences in appliance types and potential risks associated with them.

We confirmed that that risk of asthma from gas use was potentially exaggerated in studies with no or limited adjustment for confounders versus those with adjustment for at least one key confounder. In addition, our analysis found no significant increase in risk of wheeze (similar in manifestation to asthma) for gas compared with electricity.⁴⁷

Additionally, in a study that analyzes more than 500,000 primary and second school children from 47 countries, *Cooking Fuels and Prevalence of Asthma: A Global Analysis of Phase Three of the International Study of Asthma and Allergies in Childhood*⁴⁸ found in its analysis of both children 6 – 7 years old and 13 – 14 years old that “In both age groups, we detected no evidence of an association between the use of gas as a cooking fuel and either asthma symptoms or asthma diagnosis.”

CenterPoint Energy shares the interest of intervening parties in providing access to appliance repair for customers from underserved communities. The Company welcomes working with intervening parties to build on existing Energy Conservation and Optimization (“ECO”) programs⁴⁹, continuing to identify safety improvements and provide low or no-cost appliance maintenance or replacement for customers within underserved communities to help keep those customers safe and enhance their health.

Topics Open for Comment

1. Should the Commission consider any modifications to how gas utilities calculate free footage allowance and other costs related to gas main and service line extensions? If so, what factors or conditions would justify changes? And how would any proposed changes affect new connecting customers and other ratepayers?

⁴⁷ (Puzzolo et al, p. 290)

⁴⁸ ISAAC <https://olis.oregonlegislature.gov/liz/202111/Downloads/CommitteeMeetingDocument/257435>

⁴⁹ See *In the Matter of CenterPoint Energy’s 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, et al., Deputy Commissioner Decision (Dec. 1, 2023) The Company’s Low-Income Free Heating System Tune-Up program currently provides free tune-ups. The Low-Income Rental Efficiency program engages with residential building owners that house low-income renters by providing major weatherization services, equipment replacements, or repairs to reduce energy consumption and costs for low-income renter residents. The Low-Income Support and Awareness Program was created to increase participation in the Company’s other low-income programs by partnering with non-profits and social services agencies to help customers navigate eligible offerings and providing direct support to customers.

CenterPoint Energy does not recommend the Commission consider any modifications to how gas utilities calculate free footage allowance and other costs related to gas main and service line extensions.

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

The Company does not support modification to line extension policies.

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

The Company agrees with MERC's sentiments, that although the Commission required coordination with electric utilities on impacts on *resource-level* options in Natural Gas Integrated Resource Plans⁵⁰, detailed coordination at the level of *individual* customer line extensions is not reasonable. Additionally, it is the Company's position that customers have the right to evaluate and determine their own energy needs.

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

CenterPoint Energy does not take an initial position on this matter.

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

CenterPoint Energy continues to encourage the Commission to focus on regional, cold-weather state energy policy, if prioritizing other states proceedings related to this matter.

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

The Company's current policies consider customer classes in line extension policies and supports maintaining those considerations.

⁵⁰ Docket Nos. G008, G002, G011/23-117, and G999/21-565, Order Clarifying and Expanding Framework for Natural Gas Integrated Resource Planning, October 28, 2024, Order Point 30.

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

CenterPoint Energy strongly supports the Commission consider the needs of low-income customers in this matter, and for this reason, does not support modifications to current line extension policies that reduce energy access.

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

CERTIFICATE OF SERVICE

I, Christina Benning, certify that on Tuesday, September 9, 2025, I served the attached Supplemental Reply Comments Filing of CenterPoint Energy in Docket No. G999/CI-21-565 to all persons at the addresses indicated on the attached service list by having the document delivered via electronic filing.

/s/ Christina Benning

Senior Regulatory Paralegal
CenterPoint Energy

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	21-565Official Service List
2	Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource		15669 WATERLOO CIR TRUCKEE CA, 96161 United States	Electronic Service		No	21-565Official Service List
3	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	21-565Official Service List
4	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
5	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	21-565Official Service List
6	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
7	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
8	Randall	Beck	rbeck3@wm.com	Waste Management Renewable Energy, L.L.C.		1021 Main St Houston TX, 77002 United States	Electronic Service		No	21-565Official Service List
9	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	21-565Official Service List
10	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	21-565Official Service List
11	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
12	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
13	Tim	Brinkman	tim.brinkman@gvtel.com	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	21-565Official Service List
14	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21-565Official Service List
15	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN,	Electronic Service		Yes	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101 United States				
16	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	21-565Official Service List
17	Andrew	Campeau	andyc@mnpipetrades.com	Minnesota Pipe Trades Association		353 W 7th street st paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
18	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
19	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	21-565Official Service List
20	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
21	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
22	Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org			Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
23	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
24	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	21-565Official Service List
25	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	21-565Official Service List
26	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	21-565Official Service List
27	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	21-565Official Service List
28	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
29	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Lake Elmo MN, 55042 United States				Service List
30	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
31	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
32	Tom	Dicklich	tdicklich@mntrades.org	Minnesota Building & Construction Trades Council		353 W. 7th St Rm 105 Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
33	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
34	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
35	Caitlin	Eichten	eichten@fresh-energy.org	Fresh Energy		408 St Peter St #350 St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
36	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	21-565Official Service List
37	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	21-565Official Service List
38	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	21-565Official Service List
39	Mark	Foster	mark@housingfirstmn.org	Housing First Minnesota		2960 Centre Pointe Drive Roseville MN, 55113 United States	Electronic Service		No	21-565Official Service List
40	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	21-565Official Service List
41	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	21-565Official Service List
42	Patrick	Garofalo	pgarofalo@mngrocers.com	Minnesota Grocers Association		1360 Energy Park Drive Suite #300 St Paul MN, 55108 United States	Electronic Service		No	21-565Official Service List
43	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55102 United States				Service List
44	Debbie	Goettel	debbie.goettel@hennepin.us	Partnership on Waste and Energy		2785 White Bear Ave N Ste 350 Maplewood MN, 55109 United States	Electronic Service		No	21-565Official Service List
45	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	21-565Official Service List
46	Laura	Haight	lhaight@pfpi.net	Partnership for Policy Integrity		POB 2513 Amherst MA, 01004 United States	Electronic Service		No	21-565Official Service List
47	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
48	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	21-565Official Service List
49	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	21-565Official Service List
50	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
51	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	21-565Official Service List
52	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
53	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-565Official Service List
54	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
55	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21-565Official Service List
56	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
57	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55402 United States				Service List
58	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	21-565Official Service List
59	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	21-565Official Service List
60	D	Kalmon	dkalmon@mwmno.org	Mississippi Watershed Management Organization		2522 Marshall St NE Minneapolis MN, 55418-3329 United States	Electronic Service		No	21-565Official Service List
61	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	21-565Official Service List
62	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
63	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	21-565Official Service List
64	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	21-565Official Service List
65	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
66	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
67	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
68	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	21-565Official Service List
69	Robert	Lems	administration@dmr-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	21-565Official Service List
70	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	21-565Official Service List
71	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN,	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101 United States				
72	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401- 1993 United States	Electronic Service		No	21- 565Official Service List
73	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21- 565Official Service List
74	Kavita	Maini	kmainsi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21- 565Official Service List
75	Emily	Marshall	emarshall@ourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21- 565Official Service List
76	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	21- 565Official Service List
77	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	21- 565Official Service List
78	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	21- 565Official Service List
79	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	21- 565Official Service List
80	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21- 565Official Service List
81	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	21- 565Official Service List
82	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	21- 565Official Service List
83	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21- 565Official Service List
84	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21- 565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
85	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
86	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
87	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
88	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
89	Will	Nissen	wnissen@mncee.org	Center for Energy and Environment			Electronic Service		No	21-565Official Service List
90	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-565Official Service List
91	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
92	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	21-565Official Service List
93	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
94	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
95	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	21-565Official Service List
96	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	21-565Official Service List
97	Bret	Pence	bretpence@mnipl.org	Minnesota Interfaith Power and Light		106 Waverly Place Duluth MN, 55803 United States	Electronic Service		No	21-565Official Service List
98	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
99	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List
100	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	21-565Official Service List
101	Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	21-565Official Service List
102	Lauren	Reeg	lreeg@rmi.org	RMI		806 N Pinyon Ct. Hartland WI, 53029 United States	Electronic Service		No	21-565Official Service List
103	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	21-565Official Service List
104	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	21-565Official Service List
105	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	21-565Official Service List
106	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	21-565Official Service List
107	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	21-565Official Service List
108	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
109	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-565Official Service List
110	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	21-565Official Service List
111	Patrick	Serfass	pserfass@ttcorp.com	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
112	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Ste 650 Washington DC, 20036 United States				Service List
113	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	21-565Official Service List
114	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	21-565Official Service List
115	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	21-565Official Service List
116	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	21-565Official Service List
117	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
118	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	21-565Official Service List
119	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	21-565Official Service List
120	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
121	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
122	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
123	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
124	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List
125	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
126	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
127	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-565Official Service List
128	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	21-565Official Service List
129	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	21-565Official Service List
130	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	21-565Official Service List
131	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L Street #513 Sacramento CA, 95814 United States	Electronic Service		No	21-565Official Service List
132	Jenna	Warmuth	jenna@rewiringamerica.org	Rewiring America		3218 Georgia Ave NW, Suite 1 Washington DC, 20011 United States	Electronic Service		No	21-565Official Service List
133	Nicole	Westling	nicole.westling@state.mn.us		Department of Commerce	85 7th Place E Suite 280 St Paul MN, 55001 United States	Electronic Service		No	21-565Official Service List
134	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	21-565Official Service List
135	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	21-565Official Service List
136	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
137	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	21-565Official Service List
138	Mariko	Yatsunami	myatsunami@mncee.org	Center for Energy and Environment		212 N 3rd Ave Suite 560 Minneapolis MN, 55404 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
139	Grant	Zimmerman	gzimmerman@ampamericas.com	Amp Americas		811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States	Electronic Service		No	21-565Official Service List
140	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	21-565Official Service List
141	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	21-565Official Service List
142	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List