



June 28, 2024

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

RE: Center for Energy and Environment’s Comments in the Matter of a Commission Investigation into Gas Utility Resource Planning

Docket Numbers G008, G002, G011/CI-23-117, and G999/CI-21-565

Dear Mr. Seuffert,

Center for Energy and Environment (“CEE”) respectfully submits these Comments to the Minnesota Public Utilities Commission (“Commission”) in response to the May 7, 2024 Notice of Extended Comment Period in the Matter of a Commission Investigation into Gas Utility Resource Planning (“Notice”).

The Notice requested that Xcel Energy, CenterPoint Energy, and Minnesota Energy Resources Corporation (“MERC”) (together “natural gas utilities”) or other interested parties submit Straw Proposals outlining additional filing requirements for the natural gas utilities’ integrated resource plans (“IRPs”) that build upon or clarify the Commission’s March 27, 2024 Order Establishing a Framework for Natural Gas Utility Integrated Resource. On May 31, 2024, Xcel Energy, CenterPoint Energy, and MERC each submitted Straw Proposals to this docket.

The Notice provides for two comment periods through which interested parties may respond to the Straw Proposals. Specifically, the Notice poses seven questions to parties:

1. What, if any, additional filing requirements should the Commission adopt for natural gas integrated resource plans (Gas IRPs)?
2. Three utilities have been instructed to file Gas IRPs on a staggered filing schedule. Which utility should file its plan first and why? When should that plan be filed? When should the other utilities file their plans?

3. For Xcel Energy, what, if any, direction should the Commission give regarding Xcel’s analysis and reporting on methane emissions?

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

5. How should equity be incorporated into gas resource plans and the gas planning process?

Especially for members of the public and groups that interface with the public:

6. How does your community use natural gas in unique ways, ways that the Commission or other groups might not see (for example, your need for a particular power source or appliance)?

7. Before making final decisions, how can utilities best engage with communities to make sure community needs are considered in resource plans? How should utilities document community feedback as well as explain why community input was or was not used in final gas resource plans?

Below CEE responds to five of the seven questions. As noted above, questions six and seven in the Notice are directed at members of the public. CEE looks forward to reviewing comments responding to questions six and seven.

CEE is an active participant in the educational stakeholder meetings (or “Gas Utility Innovation Roundtable”), facilitated by the Great Plains Institute (“GPI”) and referenced in this docket.¹ We thank GPI for leading those stakeholder conversations, as well as Commission Staff, the Minnesota Department of Commerce (“Department”), and other stakeholder participants for their engagement. Additionally, CEE thanks Xcel Energy, CenterPoint Energy, and MERC for developing and submitting thoughtful Straw Proposals to this docket.

Our Comments below build upon the conversations and information shared through the Gas Utility Innovation Roundtable meetings and the Straw Proposals submitted by the natural gas utilities.

Background

In response to the impacts of Winter Storm Uri, a historic winter storm in February 2021 that resulted in natural gas supply and market disruptions, the Commission opened an investigation

¹ The Notice of Stakeholder Engagement Timeline and Docket Process was filed on April 11, 2023 in Docket Numbers G008, G002, G011/CI-23-117 and G999/CI-21-565.

into the impact of the storm on Minnesota’s natural gas utilities and customers.² As a result of that investigation, the Commission issued an Order in Docket Number G999/CI-21-135 on February 17, 2023, finding that natural gas resource planning is in the public interest. In April 2023, the Commission opened the current docket to develop the requirements of natural gas resource plans and issued a notice of stakeholder engagement. As noted above, the stakeholder engagement process for this docket has been led by GPI.

Commission Staff structured the current docket with two distinct phases. The first phase of this docket focused on developing the scope and framework for natural gas resource planning. Parties submitted Comments in October, November, and December of 2023 on the matter. The Commission held an agenda meeting on February 22, 2024 and issued its written Order Establishing the Framework for Natural Gas Utility Integrated Resource Plans in this docket on March 27, 2024 (“March 27, 2024 Order”). The March 27, 2024 Order established an extensive and detailed framework for natural gas IRPs, including Objectives, Guidelines, Procedural Requirements, Resource Plan Components, and an Expansion Alternatives Analysis, as well as initiating a new stakeholder process to explore possible changes to rates needed to maintain affordable and equitable utility service in light of changes in natural gas consumption and end uses. The natural gas utilities’ Straw Proposals and this Comment period are part of the second phase of this docket process, which is focused on establishing any additional filing requirements or guidance for natural gas utilities’ IRPs.

CEE Responses to the Notice

1. What, if any, additional filing requirements should the Commission adopt for natural gas integrated resource plans (Gas IRPs)?

We believe that there are a handful of additional requirements to be established through this second phase of the docket to ensure a successful and robust natural gas IRP process. However, we contend that the Commission already established a detailed and expansive framework through phase one of this docket. Moreover, natural gas resource planning is a new process for our state and our natural gas utilities. This new regulatory process comes at a time when new technologies, emerging resource options and markets, and federal and state policies are driving significant changes in the natural gas industry and in how natural gas end uses can be served. We encourage the Commission to maintain flexibility in the natural gas IRP requirements at this time so that the natural gas utilities, stakeholders, and regulators can learn and develop the best practices for natural gas resource planning in Minnesota over time. We believe that the process of developing and reviewing the different utility natural gas IRP filings will be instructive in developing additional requirements and general practices for the natural gas IRPs. As such, we

² Minnesota Public Utility Commission. (March 2, 2021). Order in Docket Number G999/CI-21-135.

assert that the Commission need only establish a few additional requirements in phase two of this docket and not an extensive or highly prescriptive list.

Below we respond to the natural gas utilities' Straw Proposals and discuss our recommendations for additional requirements and clarifications to Minnesota's natural gas utilities' resource planning process. For clarity, we structure our Comments based on the Order Points included in the Commission's March 27, 2024 Order in this docket.

Order Point Four: The scope of integrated resource planning considers the State's economy-wide greenhouse gas reduction statutory goals.

Order Point Four of the Commission's March 27, 2024 Order requires consideration of Minnesota's greenhouse gas reduction statutory goals.³ In Xcel Energy's Straw Proposal, the Company recommended that the Commission expand upon Order Point Four and adopt the following decision option:

Consider the State's economy-wide greenhouse gas reduction statutory goals consistent with Minn. Stat. § 216H.01 and 216H.02 using 2020 as the baseline year. Lifecycle GHG emission factors from filed Natural Gas Innovation Act (NGIA) Plans can also be considered in resource analysis to ensure lower emissions on a lifecycle basis.

CEE supports Xcel Energy's proposed clarification to Order Point Four of the Commission's March 27, 2024 Order in this docket. We agree that Minnesota's natural gas utilities have a critical role to play in supporting our state's statutory greenhouse gas reduction goals. In 2023, the Minnesota legislature updated Minnesota's statutory greenhouse gas reduction goals, with a final goal to have net zero greenhouse gas emissions economy-wide by 2050.⁴ This goal is both consistent with current climate science and clearly demonstrates that every sector of our economy and every industry in the state must take action for Minnesota to achieve the 2050 goal. As regulated public utilities, Minnesota's natural gas utilities have an obligation to support the state and their customers in achieving this goal. The resource planning process is a long-term and comprehensive planning process and is well-suited to serve as both the planning and accountability mechanism for natural gas utilities contribution to the state goals.

Baseline Year

³ P. 7 of the Commission's March 27, 2024 Order Establishing Framework for Natural Gas Utility Integrated Resource Planning in this docket.

⁴ Minnesota Statute §216H.02 Greenhouse Gas Emissions Control. Subd. 1

Minnesota’s statutory greenhouse gas reduction goals are based on a 2005 baseline.⁵ The Minnesota Natural Gas Innovation Act (“NGIA”), however, requires NGIA plans to reduce greenhouse gas emissions compared to a 2020 baseline.⁶ CEE has no position on the baseline year from which natural gas emissions reductions are calculated. Minnesota’s updated 2050 goal to have net-zero greenhouse gas emissions economy-wide makes the baseline year less impactful, especially after the 2030 statutory milestone to achieve a 50 percent reduction in greenhouse gas emissions economy-wide. However, we note for Commission and stakeholder consideration that natural gas consumption and emissions have increased substantially in Minnesota since 2005. In fact, natural gas consumption and emissions in Minnesota increased 16.5 percent between 2005 and 2020, and by 32.5 percent from 2005 to 2022, an increase of 13.8 percent from 2020.⁷ As such Minnesota’s natural gas utilities will need to reduce emissions by nearly 14 percent just to achieve the 2020 baseline, and by 32.5 percent to achieve the 2005 baseline. This illustrates both the scale and urgency of the challenge in decarbonizing our natural gas system and end-uses.

Lifecycle Greenhouse Gas Emissions

In addition to Minnesota’s statutory greenhouse gas reduction goals, CEE contends that it is also important to consider emissions not included in the calculation of Minnesota’s statutory greenhouse gas reduction goals through the natural gas IRP process. Minnesota’s economy-wide greenhouse gas reduction goals pertain only to “statewide greenhouse gas emissions.”⁸ Statewide greenhouse gas emissions are defined in Minnesota Statute:

“Statewide greenhouse gas emissions” include emissions of carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride emitted by anthropogenic sources within the state and from the generation of electricity imported from outside the state and consumed in Minnesota.⁹

Nonetheless, the energy resources Minnesotans consume, beyond electricity, can affect greenhouse gas emissions outside of our state, which in turn either lessens or increases the impacts of climate change globally and within our state borders. We believe it is important to track, report, and minimize out-of-state greenhouse gas emissions, such as emissions from the

⁵ Minnesota Statute §216H.02 Greenhouse Gas Emissions Control. Subd. 1

⁶ Minnesota Statute §216B.2427 Natural Gas Utility Innovation Plans. Subd. 2

⁷ Economic impacts of the COVID-19 pandemic resulted in a steep drop in natural gas consumption in Minnesota during 2020. Natural gas consumption in Minnesota increased quickly as the economic impacts of COVID-19 waned in 2022.

⁸ Minnesota Statute §216H.02 Greenhouse Gas Emissions Control. Subd. 1

⁹ Minnesota Statute §216H.01 Definitions. Subd. 2. Statewide Greenhouse Gas Emissions.

extraction, gathering, processing, and inter-state transportation of natural gas, through the natural gas IRP process. Similarly, we think it is important to track, report, and minimize out-of-state emissions associated with alternative fuels such as emissions associated with the production of hydrogen, or the emissions benefits associated with the production of biogenic renewable natural gas.

As noted by Xcel Energy in its proposed clarification to Order Point Four, the Commission established a lifecycle greenhouse gas accounting framework to be used in developing and evaluating NGIA plans and resources in its June 1, 2022 Order in Docket Number G999/CI-21-566. This framework relies on the Argonne National Laboratory's Greenhouse Gases, Regulated Emissions, and Energy Use in Technologies (GREET) model, with modifications and customization to both simplify its application and better fit Minnesota's energy system. We agree with Xcel Energy that natural gas utilities should track and report full lifecycle emissions, when applicable, of the energy resources included in natural gas IRPs using the existing greenhouse gas accounting framework and lifecycle emissions factors established in NGIA. We recommend that the Commission consider lifecycle greenhouse gas emissions through natural gas IRPs, as well as statewide greenhouse gas emissions as defined in our statutory greenhouse gas reduction goals.

Order Point 11: Energy efficiency must be treated as an energy resource alongside all other energy resources. Energy efficiency should be included in utility resource analysis and allowed to compete with supply-side and infrastructure resources to determine the optimal level of energy efficiency over the planning period.

Order Point 11 of the Commission's March 27, 2024 Order requires utilities to consider energy efficiency in their resource plan evaluations.¹⁰ On page three of Xcel Energy's Straw Proposal, the Company described how it would analyze different energy efficiency achievement scenarios and how it would estimate the costs and emissions savings of energy efficiency. Xcel Energy recommended the Commission adopt an additional decision option to clarify Order Point 11, stating, "To treat energy efficiency alongside all other energy resource options, utility integrated resource plans should evaluate energy efficiency achievement scenarios including expected program achievement to maximum achievement."¹¹

CEE supports Xcel Energy's proposed decision option clarifying Order Point 11. We support and appreciate the detailed description of the process Xcel Energy will undertake to analyze energy efficiency through the natural gas IRP process. We note that over time utilities and stakeholders may develop new techniques and approaches to modeling energy efficiency, and we encourage the Commission to remain open to such innovations.

¹⁰ P. 7 of the Commission's March 27, 2024 Order Establishing Framework for Natural Gas Utility Integrated Resource Planning in this docket.

¹¹ P. 3 of Xcel Energy's May 31, 2024 Straw Proposal filed in this docket.

We recommend that the natural gas utilities work with stakeholders through the Gas Utility Innovation Roundtable to gather and incorporate input on the assumptions used for energy efficiency in their natural gas IRPs. We strongly encourage the natural gas utilities to prioritize and maximize building shell energy efficiency measures in the natural gas IRP process. Building shell energy efficiency measures like air sealing and insulation provide sustained energy savings across several decades and offer the greatest potential for both natural gas energy and emissions savings on a lifetime basis. We look forward to working collaboratively with the natural gas utilities to develop and analyze the energy efficiency assumptions and scenarios through the natural gas IRPs.

Order Point 12: The analysis should provide utility-specific clarity about the appropriate and cost-effective level of future energy efficiency procurement.

On page 4 of Xcel Energy's Straw Proposal, the utility recommended the Commission adopt an additional decision option to clarify Order Point 12, stating, "The appropriate and cost-effective level of future energy efficiency procurement shall correspond to the maximum program spending level that remains cost-effective when compared to supply-side alternatives."¹² CEE supports Xcel Energy's suggested decision option. We believe Xcel Energy's suggested decision option provides additional direction and strengthens Order Point 12. For clarity, we understand the intent of Order Point 12 is to indicate that the level of energy efficiency found to be cost-effective through the natural gas IRP process should direct the level of energy efficiency procured through ECO and NGIA.

Order Point 15: Utilities should address risk and uncertainty of demand, availability, and price for all resource options included in resource plans, and costs to comply with any regulation of greenhouse gas emissions.

Order Point 15 in the Commission's March 27, 2024 Order in this docket requires natural gas utilities to address the costs of complying with regulation of greenhouse gas emissions in natural gas IRPs.¹³ This consideration in natural gas IRPs is analogous to the consideration of the costs of future carbon dioxide regulation, also called the regulatory cost of carbon, on electricity generation in electric resource planning, which is required by Minnesota Statute §216H.06. On December 19, 2023, the Commission established a range of regulatory costs of carbon dioxide emissions of \$5 to \$75 per short ton to be applied to electric resource plans and other dockets related to acquiring resources for generating electricity. The Commission's Order directs electric

¹² P. 4 of Xcel Energy's May 31, 2024 Straw Proposal filed in this docket.

¹³ P. 7 of the Commission's March 27, 2024 Order Establishing Framework for Natural Gas Utility Integrated Resource Planning in this docket.

utilities to apply the regulatory cost of carbon dioxide in 2028 and thereafter in modeling and analyses included with electric resource planning and acquisitions.¹⁴

Similarly, the ECO cost-effectiveness framework includes consideration of environmental compliance costs associated with natural gas. In the March 31, 2023 Decision, the Deputy Commissioner of the Department adopted a factor to be used for natural gas environmental compliance impacts in ECO cost-effectiveness testing of 1.40 percent of the commodity cost of natural gas for 2024 – 2045.¹⁵ The Department explained, “The initial value is based solely on proposed federal methane emissions standards that the EPA anticipates finalizing in 2024. All other gas environmental compliance factors are assumed to be [zero] for this Triennial. We derived the 1.40% estimate [sic] based on the EPA’s Regulatory Impact Analysis (RIA) for the proposed regulations.”¹⁶

The Commission may wish to provide guidance to natural gas utilities related to the appropriate values or factors to apply to natural gas IRPs to estimate the costs of existing and future regulation of greenhouse gas emissions. The two examples provided above represent options to inform those values. CEE requests that the natural gas utilities and other interested parties comment on the appropriateness of applying either the regulatory cost of carbon established through Minnesota Statute §216H.06 or the natural gas environmental compliance factor applied through ECO to natural gas IRPs through reply comments to this docket.

Order Point 17: Utilities should estimate the environmental externality costs of resource options.

Order Point 17 of the Commission’s March 27, 2024 Order requires utilities to estimate the externality costs of the resource options included in natural gas IRPs.¹⁷ In their respective Straw Proposals, CenterPoint Energy and Xcel Energy recommended that the Commission expand upon Order Point 17, to clarify the source of externality values to be applied to natural gas IRPs. CenterPoint Energy and Xcel Energy recommended the Commission adopt a Decision Option stating, “To estimate environmental externality costs of resource options, utilities shall use the most recent externality values adopted by the Commission in Docket No. E999/CI-14-643.”

Docket Number E999/CI-14-643 is a Commission investigation into the environmental and socioeconomic costs of electricity generation under Minnesota Statute §216B.2422, Subdivision 3, which states:

¹⁴ December 19, 2023 Commission Order Addressing Environmental and Regulatory Costs in Docket Numbers E-999/CI-07-1199 and E-999/DI-22-236.

¹⁵ Page 252 of the March 31, 2023 Department of Commerce Decision In the Matter of 2024-2026 CIP Cost-Effectiveness Methodologies for Electric and Gas Investor-Owned Utilities in Docket Number E,G999/CIP-23-46.

¹⁶ Page 252 of the March 31, 2023 Department of Commerce Decision In the Matter of 2024-2026 CIP Cost-Effectiveness Methodologies for Electric and Gas Investor-Owned Utilities in Docket Number E,G999/CIP-23-46.

¹⁷ P. 8 of the Commission’s March 27, 2024 Order Establishing Framework for Natural Gas Utility Integrated Resource Planning in this docket.

The commission shall, to the extent practicable, quantify and establish a range of environmental costs associated with each method of electricity generation. A utility shall use the values established by the commission in conjunction with other external factors, including socioeconomic costs, when evaluating and selecting resource options in all proceedings before the commission, including resource plan and certificate of need proceedings.¹⁸

On January 26, 2024, in Docket Number E999/CI-14-643, the Commission adopted the social cost of greenhouse gas values contained within the Environmental Protection Agency's Final Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances.^{19, 20}

CEE supports CenterPoint Energy and Xcel Energy's recommendation. While Minnesota Statute §216B.2422, Subdivision 3 only specifies electricity generation, we believe that the environmental costs established in Docket Number E999/CI-14-463 should be applied to emissions associated with resource options included in natural gas IRPs. There is no reason that the societal damages of greenhouse gas emissions from one energy resource would be valued differently from the societal damages of greenhouse gas emissions of another. Moreover, Minnesota Statute §216B.2422, Subdivision 3 includes a process to update Minnesota's environmental cost values as adopted by the Federal Interagency Working Group on the Social Cost of Greenhouse Gases. Tying the externality values used in natural gas IRPs to Docket Number E999/CI-14-463 will ensure that natural gas utilities use up-to-date, consistent externality values in the natural gas IRP process.

We note that due to the timing of the last Energy Conservation and Optimization Act ("ECO") Plan filings, ECO is not yet applying the externality values adopted on January 26, 2024 in Docket Number E999/CI-14-463. Rather, the approved 2024-2026 ECO Triennial Plans use externality values from the Commission's January 3, 2018 Order in Docket Number E999/CI-14-463 for ECO cost-effectiveness testing. Because the externality values used for NGIA are tied to ECO, recently filed NGIA plans also use the previously approved externality values from 2018. CEE anticipates that the Department will adopt the updated externality values from the Commission's January 26, 2024 Notice in Docket Number E999/CI-14-463 for use in ECO plans for the 2027-2029 triennium.

¹⁸ Minn. Stat. §216B.2422, Subdivision 3.

¹⁹ https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf

²⁰ P. 2 of the Commission's January 26, 2024 Notice of Final EPA Report on the Social Cost of Greenhouse Gases in Docket No. E-999/CI-14-643.

Order Point 36: A utility shall include in its resource plan filing a nontechnical summary, not exceeding 25 pages in length and describing the utility’s resource needs, the resource plan created by the utility to meet those needs, the process and analytical techniques used to create the plan, activities required over the next five years to implement the plan, and the likely effect of plan implementation on electric rates and bills.

Order Point 36 of the Commission’s Order requires utilities to file a nontechnical summary that includes the impact of the preferred plan on customer rates and bills.²¹ CenterPoint Energy and MERC filed a request to clarify this point as follows:

A utility shall include in its resource plan filing a nontechnical summary, not exceeding 25 pages in length, describing the utility’s resource needs, the resource plan created by the utility to meet those needs, the process and analytical techniques used to create the plan, activities required over the next five years to implement the plan, and the likely effect of plan implementation on electric rates and bills.²²

CEE does not oppose the proposed edit to Order Point 36. Customer costs are a critical consideration to natural gas IRPs. We encourage utilities to analyze the likely impact of natural gas IRPs on rates and bills, as well as overall energy costs and energy burden of electric and gas utility service. However, we recognize that natural gas utilities, especially CenterPoint Energy and MERC, both of which only provide natural gas in Minnesota, may not have sufficient data and insights into electric system costs to analyze the likely impact of natural gas IRPs on electric rates and bills.

We recommend that CenterPoint Energy and MERC work with electric utilities in their service territories to understand, to the extent possible, the electric system impacts of resource options in the natural gas IRPs.

Order Point 40: Utilities shall provide a high, medium, and low load forecast, along with relevant assumptions, in their resource plans.

In its Straw Proposal to this docket, CenterPoint Energy recommended that the Commission adopt a decision option clarifying Order Point 40, stating, “Where the high load forecast may

²¹ P. 10 of the Commission’s March 27, 2024 Order Establishing Framework for Natural Gas Utility Integrated Resource Planning in this docket.

²² P. 2 of CenterPoint Energy’s May 31, 2024 Straw Proposal, and p. 4 of Minnesota Energy Resource Corporation’s May 31, 2024 Straw Proposal filed in this docket.

represent the Company's forecast for design day as provided in their most recent demand entitlement filing, and sales forecast as provided in the most recent rate case."²³

This proposed decision option was discussed by stakeholders at the June 18, 2024 Gas Utility Innovation Roundtable. Stakeholders clarified with CenterPoint Energy that the load forecast referred to in Order Point 40 should be a fuel-neutral forecast of energy loads served by the natural gas utility. Those energy loads could be served by a variety of energy resources, including electricity, energy efficiency, and gaseous fuels. The natural gas IRP process would provide options for how to serve the natural gas utilities' total energy load, considering a high, medium, and low load forecast scenario.

As such, it is CEE's understanding that this proposed decision option may no longer be relevant. We look forward to further clarification by CenterPoint Energy or other parties.

Order Point 48: Utilities shall include additional analyses of scenarios and sensitivities in their resource plans as directed by the Commission.

On page five of Xcel Energy's Straw Proposal, the utility recommends the Commission adopt a decision option stating, "In initial integrated resource plans, utilities shall analyze scenarios and sensitivities as specified in the March 27, 2024 Order in this docket. The Commission may later order additional scenarios and sensitivities."²⁴

CEE does not believe Xcel Energy's proposed clarification to Order Point 48 is necessary. However, we do not necessarily oppose the clarification. We look forward to reviewing parties' comments related to possible scenarios or sensitivities to be included in initial IRPs.

Order Point 50: A natural gas utility's preferred plan should include both (1) a ten-year sales and emissions forecast, and (2) a five-year action plan of the specific steps that it will take to implement that plan over the next five years.

Order Point 50 of the Commission's Order specifies that a utility's preferred plan should include a five-year action plan.²⁵ Xcel Energy recommended that the Commission adopt a decision option to clarify the requirements of Order Point 50, stating, "The utility's preferred five-year action plan shall include justification of need, resource mix, project scope, construction timeline, and cost estimates."²⁶

CEE supports Xcel Energy's proposed clarification to Order Point 50.

²³ P. 4 of CenterPoint Energy's May 31, 2024 Straw Proposal filed in this docket.

²⁴ P. 5 of Xcel Energy's May 31, 2024 Straw Proposal filed in this docket.

²⁵ P. 11 of the Commission's March 27, 2024 Order Establishing Framework for Natural Gas Utility Integrated Resource Planning in this docket.

²⁶ P. 5 of Xcel Energy's May 31, 2024 Straw Proposal filed in this docket.

Order Point 51: Utilities shall incorporate infrastructure costs related to resource expansion or new resources above an investment threshold to be established at a later date into the resource analysis and selection process.

In discussions at the Gas Utility Innovation Roundtable on June 18, 2024, stakeholders noted some confusion or differences of interpretation related to Order Point 51. The first issue discussed was whether the investment threshold described in Order Point 51 applies only to the Expansion Alternatives Analysis portion of the natural gas IRPs or if it applied more broadly to the resource options analysis. To clarify, it is our understanding and was our intention that the investment threshold described in Order Point 51 applies only to the selection of projects for the Expansion Alternatives Analysis. We do not believe there should be an investment threshold applied to the broader analysis of resource options in natural gas IRPs.

Order Point 49 under *Resource Plan Components* states, “Natural gas resource plans shall include the cost of each scenario and sensitivity presenting both the utility’s revenue requirement and environmental costs and other externalities to the utility’s revenue requirement.”²⁷ It is our interpretation that the utility’s revenue requirement, as included in Order Point 49, would include all costs, including related distribution system and capital costs, associated with the different resource options included in natural gas IRPs. For example, if a natural gas utility includes renewable natural gas in its resource plan, the resource analysis should consider all expected capital costs associated with interconnecting, receiving, and distributing the renewable natural gas resource.

A second issue discussed at the Gas Utility Innovation Roundtable with regard to Order Point 51 was whether natural gas utilities should include a distribution system analysis, beyond and in addition to what is included in the Expansion Alternatives Analysis, in natural gas IRPs. It is our understanding of the Commission’s March 27, 2024 Order that the Expansion Alternatives Analysis is the only distribution system analysis required for natural gas IRPs at this time. As we collectively gain experience with the natural gas IRP process, the Commission may wish to include broader distribution system planning requirements in natural gas IRPs in the future. However, at this time CEE understands that Order Points 51 through 55 outline the Expansion Alternatives Analysis to be included in initial natural gas IRPs.

Definitions

In Straw Proposals to this docket, the natural gas utilities proposed definitions for “infrastructure costs” to clarify the costs to be included in the Expansion Alternatives Analysis in natural gas IRPs. While the natural gas utilities proposed slightly different definitions for infrastructure costs, all

²⁷ P. 11 of the Commission’s March 27, 2024 Order Establishing Framework for Natural Gas Utility Integrated Resource Planning in this docket.

the natural gas utilities proposed that “infrastructure costs” be defined as capital costs the utility would pay to do the project.^{28, 29, 30}

CEE supports the natural gas utilities’ clarification of infrastructure costs. Xcel Energy and CenterPoint Energy included additional definition for “Capacity Expansion Project, Resource Expansion, or New Resources,” stating, “Capacity expansion project, resource expansion, or new resources shall include individual projects, or a set of inter-related facilities needed to meet a specified capacity expansion need due to growth by existing or new customers and facilities. This excludes projects related to routine maintenance, public works accommodation, integrity, reliability, and safety.”³¹ CEE does not oppose the proposed description of capacity expansion projects, resource expansions, or new resources. However, we note that Order Point 55 states, “Distribution system investments related to routine maintenance, public works accommodation, integrity, reliability, and safety are not part of the integrated resource planning process or analysis.” Therefore, the last sentence in the proposed definition is duplicative and, we believe, unnecessary.

Investment Threshold for Inclusion in Expansion Alternatives Analysis

Xcel Energy and CenterPoint Energy proposed investment thresholds for projects to be included in the Expansion Alternatives Analysis component of the natural gas IRPs. Xcel Energy proposed a decision option stating, “For Xcel Energy, the distribution system analysis shall include infrastructure costs related to resource expansion or new resources above a \$3 million threshold, adjusted for inflation. The resource plan shall include a discussion of the rationale for the projects selected for an Expansion Alternatives Analysis.”³² CenterPoint Energy proposed a decision option, stating, “Significant upcoming capacity expansion projects’ include infrastructure costs related to resource expansion or new resources above a \$15 million threshold for CenterPoint Energy, adjusted for inflation. The resource plan will include a discussion of the rationale for the projects selected for an Expansion Alternatives Analysis.”

MERC stated, “MERC does not routinely complete expansion projects and therefore has limited relevant experience to draw from.”³³ Therefore, MERC stated that it would conduct alternatives analyses for two to three projects in its initial natural gas IRP. MERC explained, “After conducting that initial Gas IRP, MERC will have the knowledge and ability to recommend to the Commission

²⁸ P. 5 of Xcel Energy’s May 31, 2024 Straw Proposal filed in this docket.

²⁹ P. 4 of CenterPoint Energy’s May 31, 2024 Straw Proposal filed in this docket.

³⁰ P. 2 of MERC’s May 31, 2024 Straw Proposal filed in this docket.

³¹ Pages 5-6 of Xcel Energy’s May 31, 2024 Straw Proposal filed in this docket.

³² P. 6 of Xcel Energy’s May 31, 2024 Straw Proposal filed in this docket.

³³ Pp. 3-4 of MERC’s May 31, 2024 Straw Proposal filed in this docket.

an appropriate threshold for future MERC Gas IRP filings. MERC will provide the recommendation on the threshold amount in its initial Gas IRP.”³⁴

Stakeholders discussed the different natural gas utility proposals for investment thresholds at the June 18, 2024 Gas Utility Innovation Roundtable meeting. Stakeholders expressed interest in gathering additional information about the number of distribution system projects the natural gas utilities implement over a five-year period at different cost thresholds. Specifically, stakeholders asked the natural gas utilities to include the number of distribution system projects conducted over a five-year lookback period at and above a \$1 million, \$3 million, \$5 million, \$10 million, and \$15 million threshold in this Comment period. We look forward to reviewing that data and recommending cost thresholds for each of the natural gas utilities in our Reply Comments in this docket.

In our November 30, 2023 Comments in phase one of this docket, CEE stated, “We recommend that the Commission encourage utilities to adopt a range of different project characteristics and sizes (i.e. cost) for [Expansion Alternatives Analyses], so that we can collectively learn more about how to evaluate different types of projects and what types of projects may be best-suited for a full alternatives analysis.”³⁵ We continue to support this approach. We do not recommend the Commission set a cost threshold that results in utilities conducting alternatives analyses for only the two to three largest distribution system projects over the action period. The largest distribution system projects may or may not be the projects best suited for alternatives. In selecting different sizes and types of projects for the initial Expansion Alternatives Analyses, we may learn that certain characteristics or sizes of distribution system expansion projects make projects particularly well-suited for alternatives analyses. Moreover, we believe that utilities should consider additional factors, including the potential for learning, equity impacts, and emissions reductions when selecting projects for alternatives analyses.

Therefore, CEE recommends the Commission establish a cost threshold for each utility that results in a pool of projects, of different sizes and types, from which to choose projects for the Expansion Alternatives Analyses. For the initial natural gas IRPs, we recommend that the Commission require utilities to present possible expansion projects to the Gas Utility Innovation Roundtable stakeholders and collaboratively work with stakeholders to select projects for the initial Expansion Alternatives Analyses.

Requirement for Stakeholder Engagement: Natural gas utilities shall work through the Gas Utility Innovation Roundtable to engage and obtain input from stakeholders in the development of initial natural gas IRPs.

³⁴ Pp. 3-4 of MERC’s May 31, 2024 Straw Proposal filed in this docket.

³⁵ P. 32 of CEE’s November 30, 2023 Comments in this docket.

CEE recommends that the Commission require the natural gas utilities to work closely with stakeholders in the development of the initial natural gas IRPs. The Gas Utility Innovation Roundtable has been informative and productive in the development of requirements and content for the natural gas IRPs throughout this docket process. GPI brought in outside experts to educate and inform stakeholders, agencies, and utilities, and facilitated discussion so that participants could ask questions, share perspectives, and work through issues collectively. We believe continued education and stakeholder engagement will be critical as utilities develop the analytical tools, assumptions, and content for the initial natural gas IRPs. We recommend that natural gas utilities continue to work through the Gas Utility Innovation Roundtable to engage and obtain input from stakeholders as they develop their initial natural gas IRPs.

We note that new stakeholders may be interested in joining the Gas Utility Innovation Roundtable to provide input into the initial natural gas utility IRPs and that some stakeholders may be interested in a specific natural gas utility IRP, but not others. We recommend that GPI, the natural gas utilities, and stakeholders work to engage additional interested stakeholders as the focus of the Gas Utility Innovation Roundtable shifts to consider specific natural gas utility IRPs.

2. Three utilities have been instructed to file Gas IRPs on a staggered filing schedule. Which utility should file its plan first and why? When should that plan be filed? When should the other utilities file their plans?

CEE notes that the natural gas utilities agreed in their Straw Proposals that late 2026 is the earliest any of the three natural gas utilities could file an initial natural gas IRP. We understand that the utilities will need time to develop or procure analytical tools and create the structure and content of the initial natural gas IRPs and we accept the natural gas utilities' proposed timeline. Xcel Energy offered to be the first natural gas utility to file an IRP, noting its experience with natural gas infrastructure plans in Colorado and with electric resource planning here in Minnesota. We thank Xcel Energy for its willingness to submit the first natural gas IRP in Minnesota and recommend that the Commission set schedule for Xcel Energy to file its first IRP in late 2026, with CenterPoint Energy filing in late 2027, and MERC in late 2028.

3. For Xcel Energy, what, if any, direction should the Commission give regarding Xcel Energy's analysis and reporting on methane emissions?

The Commission Investigation to Identify and Develop Performance Metrics and, Potentially, Incentives for Xcel Energy's Electric Utility Operations, Docket Number E002/CI-17-401, included a discussion of methane leakage emissions associated with Xcel Energy's natural gas system and supply. Parties to that docket, including CEE, were interested in developing a metric to track and encourage reductions in full fuel cycle methane emissions associated with the natural gas on Xcel Energy's system. Xcel Energy explained that it did not have sufficient data to provide an accurate,

utility-specific estimate of upstream and mid-stream methane emissions associated with the natural gas it purchases and then sells to its Minnesota customers.

In the Commission's February 9, 2022 Order in Docket Number E-002/CI-17-401, the Commission Ordered:

Xcel must include in its [Performance Based Rates] annual reports information on: availability of data specific to its gas suppliers on upstream methane emissions; regulation of methane emissions upstream of the Company's distribution system, and the Company's position on such regulations; participation in voluntary initiatives to quantify and reduce methane from gas suppliers; any certified gas purchases; pilots with gas marketers to track and source gas with lower associated methane emissions; and any other actions the Company has taken to secure data on and/or reduce upstream methane emissions. No later than 2024, the Company will re-evaluate data available on upstream methane to consider feasibility of reporting of methane emissions attributable to total natural gas purchases across the full fuel cycle (from drilling and extraction to the end-use).

Xcel Energy provided additional detail regarding its attempts to collect data on upstream and midstream emissions in its 2022 Annual Report on Performance Metrics and Incentives.³⁶ Commission Staff summarized Xcel Energy's position in the November 2, 2023 Briefing Papers in Docket Number E002/CI-17-401:

The Company maintains emissions from upstream and midstream sources are out of Company's control. For example, sellers are not required to share methane data. The Company said that it had included in its request for purchase proposals a voluntary request for disclosure of methane intensity; however, no producer shared that information. More, the Company buys gas from pooled resources so it is unable to ascertain the individual supplier from which each gas molecule originated.³⁷

In addition to this description, Xcel Energy requested the Commission move its methane emissions reporting requirements from Docket Number E002/CI-17-401 to the natural gas IRP

³⁶ Xcel Energy's April 28, 2024 *2022 Annual Report, Performance Metrics and Incentives* in Docket Number E002/CI-17-401.

³⁷ Page 51 of Commission Staff's November 2, 2023 Briefing Papers in Docket Number E002/CI-17-401.

dockets.³⁸ Order Point 9, of the January 26, 2024 Order in Docket Number E-002/CI-17-401 stated, “The Commission moves reporting of the methane emission information in the Environmental Performance Outcome Metrics seven through nine — methane emissions from the Company’s distribution system, upstream methane emissions, and methane emissions across the full fuel cycle — to Natural Gas Resource Plan dockets.”

In its Straw Proposal in this docket, Xcel Energy proposed reporting on methane emissions using recognized protocols, like the EPA’s 40 CFR Part 98, Subpart W. Stakeholders discussed this issue at the June 18, 2024 Gas Utility Innovation Roundtable meeting and some stakeholders noted new tools available to estimate full fuel cycle methane emissions on a utility-specific basis. Based on that discussion, we expect parties to provide information on those tools through Comments in this docket.

CEE believes that it is appropriate for the Commission to provide guidance on whether and how Xcel Energy should estimate methane leakage emissions associated with its gas system and supply. We look forward to learning more about existing tools for estimating full fuel cycle methane emissions of natural gas on a utility-specific basis through parties’ Comments in this docket. CEE will include a recommendation on this matter in our Reply Comments in this docket.

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

We expect parties will include additional issues in Comments to this docket and we look forward to reviewing and responding to those additional considerations in our Reply Comments in this docket.

5. How should equity be incorporated into gas resource plans and the gas planning process? Consider the utility’s ability to impact equity in terms of:

- a. Distribution of burdens and benefits (for example, where to build infrastructure)**
- b. Participation in decision-making (for example, when, where, and how public meetings, listening sessions, etc. are held)**
- c. Solutions that match how people want to live their lives (for example, matching utility programs and services to individual community needs and wants, rather than one-size-fits-all solutions)**
- d. Redress for previous harms (for example, considering how to locate utility jobs and affordability programs in communities that have been impacted by environmental injustices or another systemic disinvestment).**

³⁸ Page 51 of Commission Staff’s November 2, 2023 Briefing Papers in Docket Number E002/CI-17-401.

For the development of natural gas IRPs and the proceeding regulatory process, we believe that participatory equity, described in subpoint b of question five in the Commission’s Notice, is of paramount importance. Ensuring that the natural gas utilities’ diverse customer base and communities have the access and ability to provide meaningful input into the decision-making of the natural gas IRP process will allow those customers and communities to then inform outcomes related to the distribution of burdens and benefits (subpoint a), solutions that match how people want to live (subpoint c), and redress for previous harms (subpoint d).

We believe that the Commission established foundational requirements for participatory equity in its March 27, 2024 Order through the *Procedural Requirements* for natural gas IRPs, including:

- making natural gas IRPs publicly available,³⁹
- requiring public meetings to provide opportunities for Minnesota residents to verbally comment on the utilities’ natural gas resource plans considering accessibility for individuals from or representing communities that are typically underrepresented in utility decision-making,⁴⁰
- requiring written notice of the resource plan to customers and local governments,⁴¹
- requiring utilities to minimize confidential data in resource plans,⁴² and
- not requiring formal intervention by docket participants or a contested case process.⁴³

Additionally, we believe that requiring natural gas utilities to work with stakeholders through the Gas Utility Innovation Roundtable may also be helpful in ensuring equitable access to participation in the natural gas IRP process and decision-making. GPI has extensive experience convening stakeholders around energy issues and regularly engages, solicits, and gathers information and feedback from stakeholders who are not able or comfortable participating in full stakeholder processes or formal regulatory processes by tailoring engagement strategies to meet those stakeholders’ needs and availability. GPI summarizes that feedback and shares it with relevant decision-makers, such as utilities, regulators, and other stakeholders. GPI has also partnered with outside organizations with existing trust and connections to specific, affected communities when leading stakeholder processes to engage communities and individuals who may be reluctant to engage directly with utilities, state agencies, and unfamiliar organizations.

CEE recommends that GPI incorporate an equity-focused component to the Gas Utility Innovation Roundtable to inform the development of natural gas utilities’ IRPs. The equity-focused process should be designed to engage customers and communities who have been

³⁹ Subpoint a. of Order Point 22 in the March 27, 2024 Order in this docket.

⁴⁰ Order Point 25 in the March 27, 2024 Order in this docket.

⁴¹ Subpoint b. and c. of Order Point 22 in the March 27, 2024 Order in this docket.

⁴² Subpoint e. of Order Point 22 in the March 27, 2024 Order in this docket.

⁴³ Order Points 23 and 24 in the March 27, 2024 Order in this docket.

historically underrepresented in utility regulatory processes, with engagement opportunities that are culturally appropriate, flexible, and meet people where they are in terms of location and knowledge of the energy system and regulation. This may be best accomplished through partnerships with outside community organizations with existing knowledge, relationships, and trust of communities. The equity-focused stakeholder engagement should be separate from the the Gas Utility Innovation Roundtable, through which traditional regulatory and energy stakeholders engage with utilities and agencies. However, we believe it is important that the two stakeholder processes and groups are connected and informed by one another. It is especially important that the traditional regulatory stakeholders in the Gas Utility Innovation Roundtable receive information and feedback from the equity-focused stakeholders, so that the Gas Utility Innovation Roundtable participants can understand and incorporate community and customer needs and concerns into their input and advocacy to the natural gas IRPs.

We note that in its Straw Proposal MERC stated, “MERC believes that the topic of equity as it relates to utility programs, services and rates would be addressed by the actions of the Executive Secretary in Order Point 56, and not within the context of the Gas IRP itself.”⁴⁴ We agree that equity will be central to the stakeholder process to consider changes to rates needed to maintain affordable and equitable utility service, described in Order Point 56. It will be critical that we, collectively, engage communities and customers who have been historically underrepresented in regulatory processes to provide input to that stakeholder conversation.

Conclusion

In summary, CEE recommends the Commission adopt the following additional decision options as requirements for natural gas utilities’ IRPs.

- Consider the State’s economy-wide greenhouse gas reduction statutory goals consistent with Minn. Stat. § 216H.01 and 216H.02. Lifecycle greenhouse gas emission factors from filed Natural Gas Innovation Act (NGIA) Plans can also be considered in resource analysis to ensure lower emissions on a lifecycle basis.
- To treat energy efficiency alongside all other energy resource options, utility integrated resource plans should evaluate energy efficiency achievement scenarios including expected program achievement to maximum achievement.
- Natural gas utilities shall work through the Gas Utility Innovation Roundtable to gather and incorporate input on the assumptions used for energy efficiency in their natural gas IRPs.
- The appropriate and cost-effective level of future energy efficiency procurement shall correspond to the maximum program spending level that remains cost-effective when compared to supply-side alternatives.

⁴⁴ P. 7 of MERC’s May 31, 2024 Straw Proposal filed in this docket.

- To estimate environmental externality costs of resource options, utilities shall use the most recent externality values adopted by the Commission in Docket No. E999/CI-14-643.
- The utility’s preferred five-year action plan shall include justification of need, resource mix, project scope, construction timeline, and cost estimates.
- “Infrastructure costs” are defined as capital costs the utility would pay to do the project.
- “Capacity Expansion Project, Resource Expansion, or New Resources” are defined as individual projects, or a set of inter-related facilities, needed to meet a specified capacity need due to growth by existing or new customers and facilities.
- Natural gas utilities shall work through the Gas Utility Innovation Roundtable to engage and obtain input from stakeholders in the development of initial natural gas IRPs.
- For the initial natural gas IRPs, natural gas utilities shall present possible expansion projects to the Gas Utility Innovation Roundtable stakeholders and work collaboratively with stakeholders to select projects for Expansion Alternatives Analyses.

We recommend the following edit be adopted for Order Point 36 from the Commission’s March 27, 2024 Order in this docket.

- A utility shall include in its resource plan filing a nontechnical summary, not exceeding 25 pages in length, describing the utility’s resource needs, the resource plan created by the utility to meet those needs, the process and analytical techniques used to create the plan, activities required over the next five years to implement the plan, and the likely effect of plan implementation on ~~electric~~ rates and bills.

CEE also recommends:

- Natural gas utilities and other parties comment on the appropriateness of applying either the regulatory cost of carbon established through Minnesota Statute §216H.06 or the natural gas environmental compliance factor applied through ECO to natural gas IRPs through reply comments to this docket.
- That GPI incorporate an equity-focused component to the Gas Utility Innovation Roundtable to inform the development of natural gas utilities’ IRPs.

We thank the Commission for considering our Comments. Please contact me at apartridge@mncee.org with any questions.

Sincerely,

/s/ Audrey Partridge
 Director of Policy
 Center for Energy and Environment

AFFIDAVIT OF SERVICE

DOCKET NUMBERS G008, G002, G011/CI-23-117 and G999/CI-21-565

I, Audrey Partridge, herby certify that on this 28th day of June 2024, I served *Center for Energy and Environment's Comments in the Matter of a Commission Investigation into Gas Utility Resource Planning* in Docket Numbers G008, G002, G011/CI-23-117 and G999/CI-21-565 on the following persons on the attached Service Lists by:

X placing such filing in envelopes, properly addressed, and depositing the same in the Post Office at the City of Minneapolis, for delivery by the United States Post Office as directed by said envelopes.

X electronic filing

/s/ Audrey Partridge
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Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute	N/A	Electronic Service	No	OFF_SL_23-117_Official List
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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	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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J	Newberger	Jnewberger1@yahoo.com	State Rep	14225 Balsam Blvd Becker, MN 55308	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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M. William	O'Brien	bobrien@mojaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-565_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-565_Official Service List
Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-565_Official Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_21-565_Official Service List
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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	OFF_SL_21-565_Official Service List
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Sarah	Mead	sarah.mead@wecenergygroup.com	MERC	N/A	Electronic Service	No	OFF_SL_21-565_Official Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
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Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-565_Official Service List
Jessica	Palmer Denig	jessica.palmer- Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-565_Official Service List
Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC	3330 Washington Blvd Ste 400 Arlington, VA 22201	Electronic Service	No	OFF_SL_21-565_Official Service List
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-565_Official Service List
Catherine	Phillips	Catherine.Phillips@wecene- rgygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-565_Official Service List
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Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, MN 55117	Electronic Service	No	OFF_SL_21-565_Official Service List

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Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_21-565_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-565_Official Service List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_21-565_Official Service List
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_21-565_Official Service List
Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth	500 East Grant Street 1207 #1207 Minneapolis, MN 55404	Electronic Service	No	OFF_SL_21-565_Official Service List
Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications	2378 Wilshire Blvd. Mound, MN 55364	Electronic Service	No	OFF_SL_21-565_Official Service List
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Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center	8421 Wayzata Blvd Ste 300 Golden Valley, MN 55426	Electronic Service	No	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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