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May 31, 2024

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

**Re: In the Matter of a Commission Investigation into Gas Utility Resource Planning
Docket No. G008,G002,G011/CI-23-117**

**In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory
and Policy Structures to Meet Greenhouse Gas Reduction Goals
Docket No. G999/CI-21-565**

STRAW PROPOSAL OF CENTERPOINT ENERGY MINNESOTA GAS

Dear Mr. Seuffert:

Pursuant to the Minnesota Public Utilities Commission's ("the Commission") May 7, 2024, Extended Notice of Comment Period ("Notice") in the above-captioned dockets, CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or "the Company") submits this Straw Proposal regarding additional filing requirements for gas utility resource planning in Minnesota.

CenterPoint Energy appreciates the participation and coordination of parties through the regulatory process to this point and is confident in the direction given by the Commission's March 27, 2024, Order ("Order") in these dockets. The Commission established a thorough framework for natural gas integrated resource plans ("IRP") based on broad perspectives grounded in coordination between parties in the technical stakeholder meetings facilitated by Great Plains Institute ("GPI").

The Company understands the purpose of the current comment period is to address additional clarifications to filing requirements that build from the framework established in the Commission's March 27, 2024, Order. CenterPoint Energy finds the Order comprehensive and provides an outline for an IRP as is. The Company recommends clarifications and definitions to specific order points as laid out in CenterPoint Energy's Straw Proposal. For all other gas IRP components not specified in the Straw Proposal, the Company does not recommend additional clarification.

CenterPoint Energy led additional utility coordination efforts between Xcel Energy ("Xcel") and Minnesota Energy Resources Corporation ("MERC") through the Straw Proposal process to provide consistency, where appropriate. The Company offers additional clarifications to filing requirements in this Straw Proposal to provide a shared direction amongst utilities prior to compiling the Company's first IRP.

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The Company's response to the topics identified in the Commission's May 7, 2024, Notice of Extended Comment Period is included in the attached Straw Proposal. CenterPoint Energy again thanks the Commission for the opportunity to provide comments.

Please feel free to contact me at 612-321-4423, seth.demerritt@centerpointenergy.com, or emily.suppes@centerpointenergy.com, 612-321-5363, with any questions.

Sincerely,

/s/ Seth DeMerritt

Manager, Regulatory and Rates

/s/ Emily Suppes

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Attachment

C: Service Lists

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

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Valerie Means
Joseph Sullivan
John Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of a Commission Investigation
into Gas Utility Resource Planning

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CENTERPOINT ENERGY MINNESOTA GAS**

Pursuant to the Minnesota Public Utilities Commission's ("the Commission") May 7, 2024, Extended Notice of Comment Period ("Notice") in the above-captioned matter, CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or "the Company") files this Straw Proposal regarding additional filing requirements for gas utility resource planning in Minnesota. As discussed below, CenterPoint Energy addresses the topics for comment from the Commission's Notice related to filing requirements to be adopted for the natural gas integrated resource plans ("IRP").

I. OVERVIEW

In the Commission's Notice, the Commission offered up the following topics for comment:

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?

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).
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?

CenterPoint Energy addresses each of the Commission’s questions below.

II. RESPONSES TO COMMISSION QUESTIONS

In the Notice, the Commission requested commenters address the following topics:

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

CenterPoint Energy believes the Commission’s March 27, 2024, Order in these dockets provides a comprehensive list of requirements for utilities to follow in order to file their IRPs and has not identified any additional topics for filing requirements for the Commission to adopt for the IRPs. However, CenterPoint Energy would like some clarification and adds further definition by creating subparts on a few order points and definitions from the Commission’s March 27, 2024, Order.

Firstly, further clarifying Order Point 17, CenterPoint Energy recommends alignment with the environmental externality costs and values in Docket No. E999/CI-14-643. In the Commission’s latest January 26, 2024, Notice in Docket No. E999/CI-14-643, the Commission adopted the social cost of greenhouse gas values contained within the U.S. Environmental Protection Agency (“EPA”) final version of its “Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances” released in November 2023.¹ The reviewed values from the Commission’s January 26, 2024, Notice and the December 19, 2023, Order in Docket

¹[EPA Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances](#)

No. E999/CI-14-643 could provide the high, medium, and low estimated inputs based on \$/short ton CO₂e.²

Therefore, CenterPoint Energy proposes the following clarifying language to Order Point 17;

17. Utilities should estimate the environmental externality costs of resources options.

17.a. To estimate the environmental externality costs of resources options, utilities will use the most recent externality values adopted by the Commission in Docket No. E-999/CI-14-643.

Secondly, in Order Point 36, CenterPoint Energy would like to clarify that the likely effect of plan implementation on rates and bills should be focused on gas utilities and ask for the word “electric” to be removed from this order point, and read as follows:

36. 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.

Thirdly, Order Point 40 states utilities shall provide a high, medium, and low load forecast. For clarification, CenterPoint Energy envisions the current forecast methodology as providing the high range of results to ensure that reliability is met during the coldest winter days, and adequate supply is available year-round to meet customer requirements. These forecast methodologies have been reviewed in demand entitlement filings and rate cases and have provided the necessary guidance for CenterPoint Energy to secure the appropriate amount of supply side requirements. The Company envisions medium and low forecast ranges will take additional resources into consideration. The Company also acknowledges there may be additional learnings related to potential modeling or requirements related to forecast data that parties may request during the initial IRP filing that CenterPoint Energy is not able to identify or provide recommendations on at this stage of the IRP framework. The Company notes that this understanding will come during the compilation of the utility’s first IRP, and as noted below in section 5, CenterPoint Energy is supportive of continuing these discussions through the recommended stakeholder process and incorporating feedback.

A clarifying addition to Order Point 40 could state:

²The CO₂ factor for the Conservation Improvement Plan (“CIP”)/Energy Conservation and Optimization Plan (“ECO”) and Natural Gas Innovation Act (“NGIA”) uses the Commission’s year-by-year values drawn from the prior January 3, 2018, Commission Order Updating Environmental Cost Values, from the same Docket, E999/CI-14-643. CenterPoint Energy notes that resource evaluation using the emissions intensity of natural gas methodology, drawn from the June 1, 2022, Order Establishing Frameworks for Implementing Minnesota’s Natural Gas Innovation Act in Docket No. G-999/CI-21-566, relies on carbon intensity using lifecycle greenhouse gas emissions, while current CIP/ECO models use an Environmental Damage Factor based on combustion emissions factors. Within the 2023 Order estimate range, the resulting CO₂e yields per dekatherm of natural gas could vary by methodology.

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

- 40.a. Where the high load forecast may 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.

Finally, with these additional definitions, CenterPoint Energy proposes the following clarifications to Order Points 51 and 54 as shown underlined below. The Company understands this Expansion Alternatives Analysis ("EAA") at its first stages as a pilot; to be iterative and transparent, as the utilities, regulators, and stakeholders learn through this process together. The clarifications below from the Company aim to provide clarifications and definitions to components of the EAA.

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.
54. For initial utility resource plans, utilities shall identify two to three significant upcoming capacity expansion projects in each utility resource plan for a full alternatives evaluation.

Proposed definitions for the underlined terminology by CenterPoint Energy include:

- 51.a. "Infrastructure costs" are Capital costs the utility would pay to do the project.
- 54.a. "Capacity Expansion Project, Resource Expansion, or New Resources" are 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. Excludes projects related to routine maintenance, public works accommodation, integrity, reliability, and safety.
- 54.b. "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.

In addition to the above clarifying definition language for Order Point 54, the Commission may want to further clarify what a "significant" upcoming project may mean. In relation to Order Point 51, this could mean the two or three largest projects greater than a specific dollar threshold. For example, in looking at past projects, CenterPoint Energy would historically have been able to provide analysis on two to three potential projects for a five-year period if an initial project estimate dollar threshold of \$15,000,000 was set. Further justification of the \$15,000,000 threshold is that this figure represents five percent of the Company's annual capital spend,³ signifying that projects

³Annual capital spend used in this calculation can be found in Table 10 of Mr. Drew Sudbury's Direct Testimony as filed in the Company's pending rate case in Docket No. G008/GR-23-173, and consists of three years of actual capital spend (2020-2022), and three years of forecasted capital spend (2023-2025).

at or above this threshold are significant. The Company requests that the Commission set the initial cost threshold at this amount to capture large projects for meaningful analysis commensurate to the cost and time this new form of regulatory analysis will require. The Company understands this is a shared perspective amongst stakeholders, to be intentional with this initial analysis, focusing on a wide range of potential learnings from an initial smaller set of varied projects. It is important to note that this dollar threshold identified was set based on CenterPoint Energy's experience and could be a different threshold for each utility. The Company acknowledges that the proposed threshold is a starting point for the initial IRP. If, during the completion of the first IRP, the Company finds there are not two to three various projects at the identified threshold, the Company agrees to complete the expansion alternatives analysis at a potentially lower threshold to meet the total of two to three projects and consider a new proposed threshold amount in the IRP filing.

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?

CenterPoint Energy is not opposed to being the first utility to file its plan. However, as the Company reviews the necessary requirements to be included in its plan, the earliest CenterPoint Energy envisions being able to file a plan would be at the end of 2026. This timeline however assumes CenterPoint Energy receives cost recovery of the needed resources it has identified to support the IRP in the current rate case, in Docket No. G008/GR-23-173, in order to ensure a complete and informative filing for interested parties.

In the scenario of CenterPoint Energy filing the first utility plan, the Company would envision that the Commission may want the other utilities to follow in subsequent years, 2027 and 2028 respectively, but does not want to speak on behalf of the other utilities.

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

CenterPoint Energy does not take a position on this matter.

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

In addition to the Order Point clarifications CenterPoint Energy identified above, CenterPoint Energy would also like to clarify in response to Order Point 48 of the Commission's March 27, 2024, Order regarding additional analyses of scenarios and sensitivities directed by the Commission, the Company believes the initial resource plans should include the information as identified in the resource plan guidelines as required by the Commission in Order Points 45, 46, and 47 as a starting point.

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).

CenterPoint Energy believes that safety and reliability are the priorities when determining projects via the IRP and fully supports a robust process that fosters equity and participation via public meetings, docket comments, and direct docket participation. The Company believes that through these opportunities to participate, customers can have an active voice in concerns or issues identified within the utilities' IRPs, and to ensure utilities are using an equitable approach to siting infrastructure while managing costs. Furthermore, as identified in Order Point 22 of the Commissions March 27, 2024, Order in this docket, the Commission has ordered utilities to:

- a. Make its resource plan publicly available on its website.
- b. Provide individual written notice of the resource plan to all its Minnesota customers through a bill insert.
- c. Provide written notice to the governing bodies of all municipalities, counties, local governing bodies, and Tribal nations within its Minnesota service territory.
- d. Develop an advertising plan for its Minnesota service territory.
- e. Minimize confidential data in resource plans as much as possible.

With these required processes, CenterPoint Energy believes customers will be adequately notified of the IRP and be given ample opportunity to participate in the IRP process. CenterPoint Energy will evaluate equity concerns as it works with communities both within the context of the IRP, as well as the Company interactions outside of the IRP process, and will take the knowledge of specific community concerns into consideration when developing plans. Additional participation within the IRP docket, outside of the work CenterPoint Energy currently does with communities, will assist in further developing the record on IRPs and potential investments. This additional understanding of areas of potential growth that community leaders envision will assist the utilities in ensuring proper natural gas infrastructure exists to serve those projects and customers.

In addition to the participation of communities within the IRP process itself, the Company does have regular participation in community meetings, and actively identifies opportunities to assist low-income residents and disadvantaged communities as part of its ECO program. Additionally, the Company addresses customers' energy burden with financial tools via the Gas Affordability Program ("GAP"). Auto-enrollment for income-qualified customers, beginning in 2024, further reduces administrative barriers for GAP participation. Further demonstrating CenterPoint Energy's community engagement, the Company understands the importance of being able to

communicate effectively with our customers through many channels. With this in mind, the Company is implementing a project to translate information on its customer websites to include Spanish, Somali, and Hmong languages on rates, billing, safety and energy efficiency information. Finally, as stated in the Company's Reply Comments in the Natural Gas Innovation Act ("NGIA") filing in Docket No. G008/M-23-215, the Company did not oppose a recommendation from intervening parties to clarify the Company's proposed objective that at least 40 percent of residential units served by certain pilots be low-income or located in a disadvantaged community. The Company looks to build on these learnings and looks to evaluate ways to incorporate public data and mapping tools for low-income residents or disadvantaged communities in this IRP process. To summarize, the Company believes it has been actively involved in supporting low-income residents and disadvantaged communities in program design and outreach activities and can build on the information gained to support communities' involvement throughout the IRP process. This will help ensure an equitable distribution of burdens and benefits, as well as solutions to match how people want to live their lives, and to provide opportunities to communities for utility jobs and affordable programs.

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)?

This question does not pertain to CenterPoint Energy. However, the Company recognizes the importance of customer choice in selecting energy solutions for their home or business and strives to learn how best to serve and understand community-specific energy needs.

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?

CenterPoint Energy believes engagement with the communities to ensure their needs are considered in resource plans can be handled in a similar fashion to engagement serving the low-income customers and disadvantaged communities as discussed in the Company's response above. The Company believes the Commission has ordered a very comprehensive communication and engagement plan in Order Point 22 of the March 27, 2024, Order in these dockets which will allow for community information as well as a process to ensure community needs are properly recorded in the IRP filings.

III. CONCLUSION

The Company appreciates the opportunity to continue to comment on this process and summarizes its recommended order points below.

- 17.a. To estimate the environmental externality costs of resources options, utilities will use the most recent externality values adopted by the Commission in Docket No. E-999/CI-14-643.

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.
- 40.a. Where the high load forecast may 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.
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- 54.a. "Capacity Expansion Project, Resource Expansion, or New Resources" are 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. Excludes projects related to routine maintenance, public works accommodation, integrity, reliability, and safety.
- 54.b. "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.

Finally, the Company believes Order Point 22 from the March 27, 2024, Order in these dockets gives communities ample opportunity to be aware of and participate in the IRP process, and the Company will continue to work with the communities it serves to best meet their needs.

CERTIFICATE OF SERVICE

On Friday, May 31, 2024, Melodee Carlson Chang certifies that she served the attached Initial Comments of CenterPoint Energy in Docket Nos. G008,G002,G011/CI-23-117 and G999/CI-21-565 to all persons at the addresses indicated on the attached service lists by having the document delivered via electronic filing.

/s/ Melodee Carlson Chang

Senior Regulatory Paralegal
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Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
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Joylyn C	Hoffman Malueg	Joylyn.hoffmanmalueg@weceenergygroup.com	Minnesota Energy Resources	2685 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_23-117_Official List
John	Jaimez	john.jaimez@hennepin.us	Hennepin County Public Works	Environment & Energy Department 701 4th Ave S Minneapolis, MN 55415	Electronic Service	No	OFF_SL_23-117_Official List
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_23-117_Official List
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Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
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David	Kailbourne	EDK@REVLNG.COM	REV LNG, LLC	1002 Empson Rd Ulysses, PA 16948	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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Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_23-117_Official List
Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce	401 N Robert Street Suite 150 St Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
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Andrew	Larson	andrew.m.larson@state.mn.us	Public Utilities Commission	121 7th Place E., #350 Saint Paul, MN 55101	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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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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James	Worlobah	james.worlobah@state.mn.us	Public Utilities Commission	121 7th Place E, Suite 350 St. Paul, MN 55101	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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Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	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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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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John	Farrell	jfarrell@ilsr.org	Institute for Local Self- Reliance	2720 E. 22nd St Institute for Local Self- Reliance Minneapolis, MN 55406	Electronic Service	No	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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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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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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