



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

November 21, 2025

VIA eFILING

Ms. Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101-2116

**Re: In the Matter of In the Matter of a Commission Investigation into Gas Utility Resource Planning;**

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

**In the Matter of Establishing an Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minn. Stat. §216H.06**

**Docket Nos. G008,G002,G011/CI-23-117; G999/CI-21-565; G999/CI-07-1199**

**REPLY COMMENTS**

Dear Ms. Bergman:

CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits the following Reply Comments in response to the Minnesota Public Utilities Commission's ("Commission") Notice of Comment Period ("Notice") issued August 25, 2025. In its Notice, the Commission requests comment on the appropriate data source and values for the regulatory cost of greenhouse gas emissions for Xcel Energy, CenterPoint Energy, and Minnesota Energy Resources Corporation's upcoming gas integrated resource plans.

If you have questions, please contact me at [Trey.Harsch@centerpointenergy.com](mailto:Trey.Harsch@centerpointenergy.com) or 612-321-5191.

Sincerely,

*/s/ Trey Harsch*

Manager, Regulatory Affairs

Attachments

C: Service List

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

**Katie J. Sieben  
Joseph K. Sullivan  
Audrey Partridge  
Hwikwon Ham  
John A. Tuma**

**Chair  
Vice Chair  
Commissioner  
Commissioner  
Commissioner**

In the Matter of In the Matter of In the Matter of  
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 State Greenhouse  
Gas Reduction Goals

Docket No. G999/CI-21-565

In the Matter of Establishing an Estimate of the  
Costs of Future Carbon Dioxide Regulation on  
Electricity Generation Under Minn. Stat.  
§216H.06

Docket No. G999/CI-07-1199

**REPLY COMMENTS**

**I. INTRODUCTION**

CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or the “Company”) respectfully submits the following reply comments in response to the Minnesota Public Utilities Commission’s (“Commission”) Notice of Comment Period (“Notice”) issued August 25, 2025.

Since filing its initial comments, CenterPoint Energy reviewed the record for other parties’ positions on the upper bound of the regulatory cost of carbon and the application of regulatory costs in gas utilities’ Integrated Resource Plans (“IRPs”). The Company supports Xcel Energy’s recommendation to set the upper bound of regulatory costs at \$13, as this appears to be an accurate reflection of anticipated near-term regulatory costs with the potential to impact Minnesota gas utilities’ cost of service.

Having identified disagreement among parties regarding which regulatory costs should be included within the regulatory cost of carbon and confusion regarding how gas utilities will apply regulatory costs within their models, CenterPoint Energy recommends allowing gas utilities to produce their initial IRPs using existing Commission guidance on the application of regulatory costs. The Company objects to the Department of Commerce’s (the “Department”) suggestion that both CenterPoint Energy and MERC should instead participate in, and base their regulatory cost values on, the results of Docket No. 25-345. The Department and the Minnesota Pollution

Control Agency's ("MPCA"), (collectively the " Agencies") request for comment in that docket closed just four days after the Department submitted their initial comments in this docket. Importantly, there is no guarantee of another opportunity to participate in Docket No. 25-345 as the Commission is under no obligation to provide another opportunity to comment after the Agencies submit their final recommendations.<sup>1</sup> Further, the Department's suggestion runs counter to the Company's understanding that the current comment period was directed at Xcel, CenterPoint Energy, and MERC, instead of only Xcel Energy. While the Company understands that the impact of this discussion on Xcel's upcoming IRP was of immediate importance due to its anticipated filing date of July 1, 2026, we were under no impression that this comment period was directed exclusively at Xcel.

CenterPoint Energy recommends applying the regulatory cost of carbon produced from this proceeding to Xcel's, CenterPoint Energy's, and MERC's initial IRPs. Further, to the extent that there is a need to further harmonization the application of the regulatory cost of carbon across gas utilities, or across gas and electric utilities, the Company recommends the Commission grant authority to the executive secretary to issue a notice of comment period on these topics ahead of utilities second IRP filings.

CenterPoint Energy continues to recommend a lower regulatory cost of \$0 and an implementation date of 2030. Taken together, these actions would sufficiently address any uncertainty surrounding the near-term future of greenhouse gas regulation in both Minnesota and the United States.

Finally, CenterPoint Energy has provided responses to the requests made by the Department of Commerce in their initial comments. These responses have been included as Attachment 1.

Additional information about each of these topics are contained within our below comments.

## **II. COMMENTS**

### **a. Upper Bound of Regulatory Costs**

Through its initial comments, CenterPoint Energy expressed concern about the impact the regulatory cost of carbon would have on its ability to deploy a number of the innovative resources currently being piloted through its Natural Gas Innovation Act ("NGIA") Innovation Plan. This is due to the fact that some future regulatory costs – such as those that might occur under a carbon tax – may be applied to end-use emissions, and not every innovative technology being deployed by the Company eliminates end-use emissions. Further, the Company expressed a hesitancy to recommend and/or plan for the full-scale deployment of some innovative technologies, such as thermal energy networks ("TENs"), through the IRP process before the Company has been able to deliver a successful pilot through the NGIA.

Although these concerns cannot be completely resolved ahead of producing the Company's first IRP, we believe they can be minimized through the establishment of a regulatory cost range that most closely reflects the regulatory costs likely to impact gas utilities over the next several years. Adopting a regulatory cost of carbon that closely resembles the most likely range of

---

<sup>1</sup> Docket No. E999/DI-25-345, the Department of Commerce and the Minnesota Pollution Control Agency, Request for Comment filed September 9, 2025, p.1.

future regulatory costs would ensure the Company is able to benefit from anticipating regulation that may increase the cost of its service without disincentivizing innovative technologies that are carbon neutral or carbon negative over their lifecycle but still produce end-use emissions. Given this, CenterPoint Energy supports Xcel Energy's recommendation to establish an upper regulatory cost value of \$13 / MMT CO<sub>2</sub>e.

Xcel Energy's proposed \$13 / MMT CO<sub>2</sub>e upper regulatory cost value is based on the Environmental Protection Agency's ("EPA") rules to reduce methane from oil and gas operations, specifically, the Regulatory Impact Analysis of the Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review.<sup>2</sup> This proposed regulation would apply to the production and transmission of natural gas. These processes occur upstream of the natural gas distribution system owned and operated by the Company, but would impact natural gas supply commodity prices, raising costs for both the Company and our customers. Although these proposed EPA regulations face headwinds under the current federal administration, this uncertainty is accounted for through the Company's proposed \$0 / MMT CO<sub>2</sub>e lower regulatory cost value and implementation date of 2030.

CenterPoint Energy has not found that the current \$75 / MMT CO<sub>2</sub>e value is realistic. Although this value was adopted by the Commission without having considered its impact on gas utilities,<sup>3</sup> the Company understands that the value itself is based on an economy-wide carbon-tax and thus conceptually could be applied to gas utilities in addition to electric utilities. However, this value is based on an analysis of what actions would be required from wealthy countries to curb the impact of climate change. By adopting this value, it is likely that gas utilities will be assuming the existence of future costs that may never materialize when making resource acquisition decisions. While CenterPoint Energy does not dispute the intent of the analysis that gave rise to this value, we do not have reason to believe that such regulation is being contemplated at the state or federal level.

Setting a regulatory cost of carbon significantly higher than the most probable costs utilities are likely to incur could compel IRPs to overemphasize environmental considerations at the expense of affordability and reliability, which would run counter to the Commission's prior emphasis on affordability and the avoidance of price spikes.<sup>4</sup> If a nationwide carbon tax or similar regulation becomes a serious policy consideration in the future, the regulatory cost of carbon can, and likely will, be updated prior to gas utilities' subsequent IRP filings.

**i. Disagreement on what regulatory costs represent; confusion on how they are applied**

Related to our discussion of the upper regulatory cost of carbon value, the Company would like to address a point of disagreement between Xcel Energy and Fresh Energy, MCEA, and Sierra Club (herein referred to as the "clean energy organizations" or "CEOs"). Through its initial

---

<sup>2</sup> [https://www.epa.gov/system/files/documents/2023-12/eo12866\\_oil-and-gas-nsps-eg-climate-review-2060-av16-ria-20231130.pdf](https://www.epa.gov/system/files/documents/2023-12/eo12866_oil-and-gas-nsps-eg-climate-review-2060-av16-ria-20231130.pdf)

<sup>3</sup> At the time this issue was last considered by the Commission a gas utility IRP framework had yet to be developed, and thus the record did not reflect the impact of the regulatory cost of carbon on gas utilities.

<sup>4</sup> February 17, 2023, *Order Requiring Actions to Mitigate Impacts from Future Natural Gas Price Spikes, Setting Filing Requirements, and Initiating a Proceeding to Establish Gas Resource Planning Requirements*, Docket Nos, G-999/CI-21-135, G-008/M-21-138, G-004/M-21-235, G-002/CI-21-610, and G-011/CI-21-611, p.21.

comments, Xcel Energy proposed that the roughly \$13 / MMT CO<sub>2</sub>e regulatory costs contemplated by the EPA are appropriate to reference when establishing the regulatory cost of carbon, because they would impact natural gas supply commodity prices.<sup>5</sup> Conversely, the CEOs argued that these EPA compliance costs would not be appropriate to consider when establishing the regulatory cost of carbon because they view the cost of meeting methane regulation as separate, and in addition to, costs related to carbon regulation. For example, they noted that methane leakage costs would not be subject to a carbon tax.<sup>6</sup>

CenterPoint Energy disagrees with the interpretation provided by the CEOs and continues to support the Commission's consideration of the EPA's proposed rules to reduce methane emissions from oil and gas for establishing an upper regulatory cost value for gas utilities' initial IRPs. The CEOs' argument heavily implies that the only future regulation considered by the regulatory cost of carbon is a carbon tax, which would apply to end uses where natural gas is ultimately burned. Although the regulatory cost of carbon is frequently related to a carbon tax, this is done as a way to conceptualize an otherwise amorphous concept. The reality is that the statutory language used to establish the regulatory cost of carbon does not draw clean lines around which future regulatory costs are, or are not, included within the value. What language is provided considers electricity generation, not electric end-uses. Thus, Xcel Energy's interpretation that regulatory costs impacting the manufacturing and transportation of natural gas can, and should, be considered within the regulatory cost of carbon is legitimate. Further, framing the regulatory costs around gas supply and commodity prices is in-line with the initial intent of gas IRPs, which was to reduce exposure to high gas costs and market volatility in the wake of Winter Storm Uri.

This disagreement highlights a lack of alignment among parties regarding what these regulatory costs represent within a gas IRP and how they should be applied in the modeling process. For example, Xcel Energy viewed the regulatory cost of carbon as future regulation that will impact the cost of natural gas supply resources, while the CEOs viewed the regulatory cost of carbon as a tax on natural gas use, exclusive of any regulations impacting the cost of natural gas supply. In their initial comments the Department also expressed uncertainty about the application of regulatory and externality costs in gas IRPs.<sup>7</sup> Although the Commission required gas utilities to consider the regulatory cost of carbon in their IRPs, it has yet to provide the guidance necessary to address these differing interpretations.

It is unclear how much of an impact these differences in opinion will have on gas utilities' initial IRPs. Functionally, the difference between Xcel's and the CEO's interpretation may be minimal. However, given that Xcel's IRP is due in 2026, there is unlikely to be enough time to tackle this issue for the first round of gas IRPs in a way that is sufficiently robust for such a dense topic. CenterPoint Energy recommends allowing gas utilities to apply the regulatory cost of carbon to initial IRPs using existing Commission guidance. To the extent that utilities' and parties' understanding of the regulatory cost of carbon differ, the Company suggests the Commission issue a notice of comment period between utilities' first and second IRP filings to harmonize the collective understanding of what these values represent, and how they should be applied within

---

<sup>5</sup> Docket No. G999/CI-21-565, Xcel Energy, Initial Comments filed October 31, 2025, p.4.

<sup>6</sup> Docket No. G999/CI-21-565, Fresh Energy, MCEA, and Sierra Club, Initial Comments filed October 31, 2025, p.3.

<sup>7</sup> Docket No. G999/CI-21-565, Department of Commerce, Initial Comments filed November 3, 2025, p.15.

the context of a gas IRP. CenterPoint Energy believes such a discussion would be most productive with examples from the initial gas IRPs from Minnesota to reference.

**b. Lower Bound of Regulatory Costs and Implementation Date**

After reviewing the record, CenterPoint Energy continues to support a lower regulatory cost value of \$0 and an implementation date of 2030. Both recommendations deal fundamentally with the uncertainty surrounding the future carbon regulation in the United States and the State of Minnesota. A \$0 lower regulatory cost value could represent a future in which no new climate regulations are put in place, either because of changes in state or federal policy that deprioritizes climate action, because any climate-related action is exclusively centered around incentivizing climate-friendly behaviors,<sup>8</sup> or because current initiatives are sufficiently successful in reducing our collective carbon footprint.<sup>9</sup> Both the \$0 lower regulatory cost value and the 2030 implementation date recognizes the current federal administration's lack of interest in climate policy, as well as the state's very recent action in passing the NGIA.

**c. Department Recommendation for CenterPoint Energy and MERC to Leverage the Regulatory Costs Developed in Docket No. 25-345**

In its initial comments, the Department indicated that the outcomes of the current discussion on regulatory costs would apply only to Xcel Energy's initial IRP.<sup>10</sup> It further suggested that CenterPoint Energy and MERC could rely on the determinations made in Docket No. 25-345 for their regulatory cost values, given that their IRP filing dates are scheduled after 2026.

CenterPoint Energy disagrees with this decision. The Company's understanding is that the present comment period was addressed to all gas utilities required to file an IRP, not only Xcel Energy. The Commission's August 25, 2025 notice requested comment on if the Commission's previously adopted regulatory cost values were appropriate for use in each utility's initial IRP filing. Further the Department's initial comments included a request for data that was addressed to all three gas utilities. If the Commission had intended the regulatory costs being discussed in this docket to only apply to Xcel's initial plan, CenterPoint and MERC would have already been directed to participate in Docket 25-345 and this comment period would have taken place in a docket specific to Xcel Energy.

Applying the same regulatory costs to each of the gas utilities' initial IRPs ensures consistency across filings, and appears to be most consistent with the first topic open for comment in the Commission's August 25, 2025 Notice:

*Are the values established for Minn. Stat. § 216H.06 and last approved in Docket No. E999/CI-07-1199 in the Commission's December 19, 2023 Order appropriate for use in*

---

<sup>8</sup> On page 8 of their August 4, 2023 Reply Comments in Docket Nos. E999/DI-22-236 and E999/CI-07-1199, the CEOs noted that a \$0 value at the low end of the regulatory cost range "reflects the possibility that utilities will not face additional carbon limits, which could happen if, for example, utility decarbonization is driven at a sufficiently fast pace by technological and economic advances and by subsidies rather than by carbon limits."

<sup>9</sup> With its August 4, 2023 Reply Comments in Docket Nos. E999/DI-22-236 and E999/CI-07-1199, Xcel Energy noted that a \$0 lower regulatory cost bound would recognize the impact of newly passed or proposed laws, and cited a study by the Rhodium Group which indicated that existing and proposed climate policies put the United States in reach of achieving its emissions reduction targets under the Paris Agreement.

<sup>10</sup> Docket No. G999/CI-21-565, Department of Commerce, Initial Comments filed November 3, 2025, p.15.

*Xcel Energy, CenterPoint Energy, and Minnesota Energy Resource Corporation's upcoming IRPs?*<sup>11</sup>

CenterPoint Energy is aware that gas and electric utilities may someday share the same regulatory cost of carbon and participate in the same process for updating those costs. However, the existence of the current comment period seems to confirm that the integration of gas utilities into the existing electric utility process is a future discussion; one that will occur after collective experience is gained with gas utility IRPs.

CenterPoint also disagrees that Docket No. 25-345 is the appropriate location to have these discussions. There was not ample enough notice to respond to the Agencies' request for comment in that docket, which closed just four days after the Department's initial comments, and, as stated by the Agencies in their notice, there is no requirement for the Commission to provide an additional opportunity for interested parties to provide written comments after the Agencies provide their final recommendations to the Commission.<sup>12</sup>

### **III. List of Recommendations**

Below, CenterPoint Energy provides a complete list of its final recommendations for Commission consideration:

1. A lower regulatory cost of carbon value of \$0.
2. An upper regulatory cost of carbon value of \$13.
3. Setting the effective date for regulatory costs at 2030.
4. Allow CenterPoint Energy, Xcel Energy, and MERC to develop their initial IRPs using existing guidance on the application of the regulatory cost of carbon.
5. Grant authority to the executive secretary to issue a notice of comment period before the submission of the gas utilities' second IRPs on the following:
  - a. The need to further harmonize the application of the regulatory cost of carbon across gas utilities' IRPs.
  - b. The need to standardize regulatory cost values across gas and electric utilities.

### **IV. CONCLUSION**

The Company thanks the Commission for consideration of these Reply Comments. CenterPoint Energy CenterPoint Energy looks forward to discussing its first IRP once it has been filed on July 1, 2027.

---

<sup>11</sup> Docket No. G999/CI-21-565, Notice of Comment Period filed August 25, 2025.

<sup>12</sup> Docket No. E999/DI-25-345, the Department of Commerce and the Minnesota Pollution Control Agency, Request for Comments filed September 8, 2025.

## **ATTACHMENT 1**

Through its initial comments, the Department requested the following information be included in utilities' reply comments:

1. Consistent with the information supplied by the LDC to EPA's GHGRP, provide information for 2024;
2. Provide a short narrative description of how the values listed in the table above, and inclusive of data for 2024, were tabulated and calculated;
3. Provide the natural gas deliveries (in Dekatherms) for the years 2010 through 2024 segregated by end-user (that is separately for residential customers, commercial customers, industrial customers, and electric generating facilities);
4. Provide the natural gas deliveries (in Dekatherms) for the years 2010 through 2024 further segregated between sales and transport categories by end-user (that is separately for residential customers, commercial customers, industrial customers, and electric generating facilities); and
5. To identify, explain, and discuss both the internal accounting and FERC accounts and sub-accounts that are used to track and record the internal costs used in reporting the data above.

CenterPoint provides the requested information below.

#### **1. Greenhouse gas Emissions Data for 2024**

CenterPoint Energy reviewed the data reported by the Department of Commerce in Table 1 of its initial filing, as well as the greenhouse gas search tool the Department used to create the table. The Company was able to verify how the Department used the EPA's greenhouse gas search tool to create its table. However, the information provided by the EPA's greenhouse gas search tool does not match the emissions data we report under 40 CFR Part 98.

The information the Department pulled from the EPA is cited by the EPA as a summation of utilities' annual emissions data filed under 40 CFR Part 98, Subpart NN and Subpart W:

- **Subpart NN** is a mass balance of emissions from gas used in the distribution system. For example, it adds and subtracts gas taken from, or put into storage, respectively, and subtracts volumes used by large end users who report their own emissions data to the EPA.
- **Subpart W** is based on equipment leaks via leak survey and leaker emissions factors, equipment leaks via population counts and emissions factors, and combustion emissions.

The Company found that the information referenced by the Department equaled roughly double the combined value emissions reported under Subparts NN and W in any given year. CenterPoint Energy identified that the value reported by the Department for 2010 – which was said to only include information from Subpart NN – was quite close to the value calculated by the Subpart's NN-1 equation. However, Subpart NN-1 represents the amount of gas received by the city gate (or "town border station"). It does not account for gas distributed to other LDCs or pipelines, nor does it account for deliveries to large end users or gas placed into or withdrawn from storage. Large end users report their combustion of natural gas directly to EPA. As a general rule, CenterPoint does not find Subpart NN-1 to be accurate account of emissions due to the fact that it would be quite easy for someone to unintentionally double count large end

users' emissions if they referenced both CenterPoint's Subpart NN-1 and the emissions data provided by individual large end users on CenterPoint's distribution system.

Despite having made this discovery, the combined value based on equation NN-1 from Subpart NN and W is also significantly lower than the values reported by the Department. CenterPoint has reached out directly to the EPA through its greenhouse gas search tool, but due to the recent government shut down, does not anticipate a response in the near future.<sup>1</sup>

In Table 1 below, CenterPoint Energy has provided its emissions data for Subparts, W, NN, and equation NN-1 from Subpart NN. The table also displays the summation of these values and compares it to what was reported by the Department of Commerce.

**Table 1: 40 CFR Part 98, Subparts NN and W**

GHG Reporting Year	Subpart W	Subpart NN EPA Reportable Emissions (Total with Large End Users and storage subtracted)	Subpart W and NN Sum EPA Reportable	Eq. NN-1 (Emissions for total gas supplied)	Subpart W and Eq. NN-1 Summed	DOC Values
	Metric Tons CO <sub>2</sub> e	Metric Tons CO <sub>2</sub>	Metric Tons CO <sub>2</sub> e	Metric Tons CO <sub>2</sub>	Metric Tons CO <sub>2</sub> e	Metric Tons CO <sub>2</sub> e
2024	75,530.20	7,262,130.50	7,337,660.70	9,943,189.20	10,018,719.40	
2023	67,972.50	7,486,835.50	7,554,808.00	10,122,117.10	10,190,089.60	20,210,500.00
2022	68,220.60	8,530,474.20	8,598,694.80	10,631,141.20	10,699,361.80	21,219,009.00
2021	67,815.30	7,599,163.60	7,666,978.90	9,525,159.60	9,592,974.90	19,003,794.00
2020	69,271.60	6,885,668.60	6,954,940.20	8,973,739.90	9,043,011.50	18,081,028.00
2019	71,782.90	8,052,402.30	8,124,185.20	10,693,239.60	10,765,022.50	21,510,574.00
2018	72,968.70	7,823,944.70	7,896,913.40	10,205,705.10	10,278,673.80	20,534,110.00
2017	75,336.00	7,272,018.90	7,347,354.90	9,465,391.20	9,540,727.20	19,063,313.00
2016	78,053.30	6,746,952.90	6,825,006.20	9,413,120.70	9,491,174.00	18,970,133.00
2015	81,369.30	6,751,781.90	6,833,151.20	9,373,959.40	9,455,328.70	18,891,607.00
2014	85,445.80	7,837,784.10	7,923,229.90	9,698,130.80	9,783,576.60	19,548,223.00
2013	89,185.90	7,917,804.10	8,006,990.00	10,001,401.10	10,090,587.00	20,159,150.00
2012	78,602.60	6,234,599.70	6,313,202.30	8,478,423.70	8,557,026.30	17,137,123.00
2011	81,297.00	7,037,519.60	7,118,816.60	8,623,740.70	8,705,037.70	17,456,644.00
2010	-	6,779,340.90	6,779,340.90	8,589,644.93	8,589,644.93	8,589,548.00

<sup>1</sup> On November 20, 2025, CenterPoint Energy heard back from the EPA regarding the greenhouse gas search tool and was notified that the issue identified in these comments was resolved. CenterPoint Energy stands by the accuracy of the information provided in Table 1.

Notably, CenterPoint Energy was able to verify the accuracy of the information provided by the EPA's FLIGHT<sup>2</sup> tool.<sup>3</sup> After filtering for local distribution utilities and entering "CenterPoint Energy Minnesota Gas" in the search bar, users will be shown a rough outline of our service territory. After clicking on the outline of our service territory, a new window will open which will allow users to select "view reported data." By scrolling down to the relevant subparts, parties will be able to verify the information reported above.

## 2. A Short Narrative for Subparts NN and W

**Subpart NN** is a mass balance of emissions from gas used in the distribution system. For example, it adds and subtracts gas taken from, or put into storage, respectively, and subtracts volumes used by large end users who report their own emissions data to the EPA.

Subpart NN CO<sub>2</sub> = CO<sub>2i</sub> + CO<sub>2n</sub> - CO<sub>2j</sub> - ΣCO<sub>2k</sub> -CO<sub>2l</sub>

- CO<sub>2i</sub> = CO<sub>2</sub> from NG received from city gate
- CO<sub>2n</sub> = CO<sub>2</sub> from any NG that bypassed the city gate
- CO<sub>2j</sub> = CO<sub>2</sub> from any NG that was supplied to another LDC or to another pipeline
- CO<sub>2k</sub> = CO<sub>2</sub> from the summation of NG supplied to large end users – these are entities that report their own natural gas CO<sub>2</sub> emissions directly to the EPA
- CO<sub>2l</sub> = CO<sub>2</sub> from NG after subtracting the NG extracted from storage from the amount put into storage.

**Subpart W** is based on equipment leaks via leak survey and leaker emissions factors, equipment leaks via population counts and emissions factors, and combustion emissions.

## 3. Natural Gas Deliveries (2010–2024) by End-User and Category

CenterPoint Energy has provided the information requested by the Department regarding its natural gas deliveries to customers in Attachment 2. The Company referenced its annual July 1<sup>st</sup> filing in Docket No. YR-19 for this information. This docket number has been used to provide this information since 2015. In 2014, Docket No. 14-466 was used for this report. Prior to this, the Company had emailed this information to [rule7610.reports@state.mn.us](mailto:rule7610.reports@state.mn.us). The earliest report identified by the Company was its 2011 report. Because of this, data from 2010 was not available.

## 4. Internal Accounting and FERC Accounts Used to Track and Record Internal Costs Used in Reporting the Above Data

The costs to report the information covered under Department requests 3 and 4 are tracked and recorded in FERC Account 920. FERC Account 920 as defined in the FERC uniform system of accounts is used to account for Administrative and General ("A&G") salaries. These A&G salaries are inclusive but not limited to the Accounting and Regulatory departments that would be responsible for reporting the requested information in requests 3 and 4.

---

<sup>2</sup> FLIGHT = Facility Level Information on GreenHouse Gasses Total

<sup>3</sup> <https://ghgdata.epa.gov/ghgp/main.do>

## CERTIFICATE OF SERVICE

I, Christina Benning, certify that on Friday, November 21, 2025, I served the attached Reply Comments Filing of CenterPoint Energy in Docket Nos. G008,G002,G011/CI-23-117, G999/CI-21-565, and G999/CI-07-1199 to all persons at the addresses indicated on the attached service list by having the document delivered via electronic filing.

/s/ Christina Benning  
Senior Regulatory Paralegal  
CenterPoint Energy

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	23-117Official List
2	Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource		15669 WATERLOO CIR TRUCKEE CA, 96161 United States	Electronic Service		No	23-117Official List
3	Jose	Alvillar	jose@unidos-mn.org	Unidos-MN		null null, null United States	Electronic Service		No	23-117Official List
4	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	23-117Official List
5	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-117Official List
6	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	23-117Official List
7	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall FI 5 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
8	James H.	Barkley	james.barkley@bakerbotts.com	Baker Botts		910 Louisiana Street Houston TX, 77002-4995 United States	Electronic Service		No	23-117Official List
9	Marisa	Bayer	mbayer@edinamn.gov	City of Edina		4801 W 50th St Edina MN, 55424 United States	Electronic Service		No	23-117Official List
10	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	23-117Official List
11	Randall	Beck	rbeck3@wm.com	Waste Management Renewable Energy, L.L.C.		1021 Main St Houston TX, 77002 United States	Electronic Service		No	23-117Official List
12	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	23-117Official List
13	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	23-117Official List
14	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
15	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	23-117Official List
16	Mike	Boughner	michael.i.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
17	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		Yes	23-117Official List
18	Jocelyn	Bremer	jocelyn.bremer@minneapolismn.gov	City of Minneapolis		350 S Fifth St Ste 210 Minneapolis MN, 55415 United States	Electronic Service		No	23-117Official List
19	Tim	Brinkman	tim.brinkman@gvtel.com	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	23-117Official List
20	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-117Official List
21	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	23-117Official List
22	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	23-117Official List
23	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	23-117Official List
24	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	23-117Official List
25	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
26	Barbara	Case	barbara.case@state.mn.us		Office of Administrative Hearings	600 N. Robert St. St. Paul MN, 55101 United States	Electronic Service		No	23-117Official List
27	Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org			Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul MN, 55102 United States	Electronic Service		No	23-117Official List
28	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-117Official List
29	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
30	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	23-117Official List
31	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	23-117Official List
32	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	23-117Official List
33	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	23-117Official List
34	Noah	Cordoba	noah@buildingdecarb.org	Building Decarbonization Coalition		33594 Herring View Drive Lewes DE, 19958 United States	Electronic Service		No	23-117Official List
35	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-117Official List
36	Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 St. Paul MN, 55104 United States	Electronic Service		No	23-117Official List
37	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
38	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
39	Tom	Dicklich	tdicklich@mntrades.org	Minnesota Building & Construction Trades Council		353 W. 7th St Rm 105 Saint Paul MN, 55102 United States	Electronic Service		No	23-117Official List
40	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	23-117Official List
41	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	23-117Official List
42	Brian	Edstrom	briane@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
43	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	23-117Official List
44	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	23-117Official List
45	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	23-117Official List
46	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	23-117Official List
47	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	23-117Official List
48	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	23-117Official List
49	Debbie	Goettel	debbie.goettel@hennepin.us	Partnership on Waste and Energy		2785 White Bear Ave N Ste 350 Maplewood MN, 55109 United States	Electronic Service		No	23-117Official List
50	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	23-117Official List
51	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
52	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-117Official List
53	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	23-117Official List
54	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-117Official List
55	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	23-117Official List
56	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55402 United States				
57	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	23-117Official List
58	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	23-117Official List
59	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	23-117Official List
60	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	23-117Official List
61	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	23-117Official List
62	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23-117Official List
63	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
64	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
65	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	23-117Official List
66	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	23-117Official List
67	D	Kalmon	dkalmon@mwmw.org	Mississippi Watershed Management Organization		2522 Marshall St NE Minneapolis MN, 55418-3329 United States	Electronic Service		No	23-117Official List
68	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23-117Official List
69	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
70	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution	520 Lafayette Rd N. St. Paul MN,	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Control Agency	55155 United States				
71	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
72	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-117Official List
73	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	23-117Official List
74	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
75	Andrew	Larson	andrew.m.larson@state.mn.us		Public Utilities Commission	121 7th Place E., #350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23-117Official List
76	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-117Official List
77	Robert	Lems	administration@dm-t-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	23-117Official List
78	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-117Official List
79	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-117Official List
80	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-117Official List
81	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
82	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-117Official List
83	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
84	Emily	Marshall	emarshall@ourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
85	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	23-117Official List
86	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
87	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	23-117Official List
88	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-117Official List
89	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	23-117Official List
90	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	23-117Official List
91	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-117Official List
92	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-117Official List
93	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
94	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	23-117Official List
95	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-117Official List
96	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
97	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
98	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	23-117Official List
99	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
100	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-117Official List
101	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-117Official List
102	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-117Official List
103	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	23-117Official List
104	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	23-117Official List
105	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
106	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		Yes	23-117Official List
107	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-117Official List
108	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-117Official List
109	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	23-117Official List
110	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	23-117Official List
111	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55901 United States				
112	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	23-117Official List
113	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	23-117Official List
114	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
115	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	23-117Official List
116	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-117Official List
117	Patrick	Serfass	pserfass@ttcorp.com	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	23-117Official List
118	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	23-117Official List
119	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	23-117Official List
120	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	23-117Official List
121	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-117Official List
122	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-117Official List
123	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-117Official List
124	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
125	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-117Official List
126	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
127	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
128	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	23-117Official List
129	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
130	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	23-117Official List
131	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
132	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	23-117Official List
133	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
134	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	23-117Official List
135	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-117Official List
136	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L Street #513 Sacramento CA, 95814 United States	Electronic Service		No	23-117Official List
137	Nicole	Westling	nicole.westling@state.mn.us		Department of Commerce	85 7th Place E Suite 280 St Paul MN, 55001 United States	Electronic Service		No	23-117Official List
138	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
139	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	23-117Official List
140	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
141	James	Worlobah	james.worlobah@state.mn.us		Public Utilities Commission	121 7th Place E, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	23-117Official List
142	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-117Official List
143	Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts		700 K St NW Washington DC, 20001 United States	Electronic Service		No	23-117Official List
144	Grant	Zimmerman	gzimmerman@ampamericas.com	Amp Americas		811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States	Electronic Service		No	23-117Official List
145	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-117Official List
146	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	23-117Official List
147	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	21-565Official Service List
2	Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource		15669 WATERLOO CIR TRUCKEE CA, 96161 United States	Electronic Service		No	21-565Official Service List
3	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	21-565Official Service List
4	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
5	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	21-565Official Service List
6	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
7	Ryan	Baumtrog	ryan.baumtrog@state.mn.us		Minnesota Dept of Housing	400 Wabasha St N Ste 400 St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
8	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
9	Randall	Beck	rbeck3@wm.com	Waste Management Renewable Energy, L.L.C.		1021 Main St Houston TX, 77002 United States	Electronic Service		No	21-565Official Service List
10	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	21-565Official Service List
11	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	21-565Official Service List
12	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
13	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	21-565Official Service List
14	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
15	Tim	Brinkman	tim.brinkman@gvtel.com	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
16	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21-565Official Service List
17	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	21-565Official Service List
18	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	21-565Official Service List
19	Andrew	Campeau	andyc@mpipetrades.com	Minnesota Pipe Trades Association		353 W 7th street st paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
20	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
21	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	21-565Official Service List
22	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
23	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
24	Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org			Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
25	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
26	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	21-565Official Service List
27	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	21-565Official Service List
28	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
29	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	21-565Official Service List
30	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
31	Noah	Cordoba	noah@buildingdecarb.org	Building Decarbonization Coalition		33594 Herring View Drive Lewes DE, 19958 United States	Electronic Service		No	21-565Official Service List
32	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	21-565Official Service List
33	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
34	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
35	Tom	Dicklich	tdicklich@mntrades.org	Minnesota Building & Construction Trades Council		353 W. 7th St Rm 105 Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
36	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
37	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
38	Caitlin	Eichten	eichten@fresh-energy.org	Fresh Energy		408 St Peter St #350 St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
39	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	21-565Official Service List
40	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	21-565Official Service List
41	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	21-565Official Service List
42	Mark	Foster	mark@housingfirstmn.org	Housing First Minnesota		2960 Centre Pointe Drive Roseville MN, 55113 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
43	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	21-565Official Service List
44	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	21-565Official Service List
45	Patrick	Garofalo	pgarofalo@mngrocers.com	Minnesota Grocers Association		1360 Energy Park Drive Suite #300 St Paul MN, 55108 United States	Electronic Service		No	21-565Official Service List
46	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
47	James	Gignac	jjgignac@ucsusa.org	Union of Concerned Scientists		1 N LaSalle St Ste 1904 Chicago IL, 60602 United States	Electronic Service		No	21-565Official Service List
48	Debbie	Goettel	debbie.goettel@hennepin.us	Partnership on Waste and Energy		2785 White Bear Ave N Ste 350 Maplewood MN, 55109 United States	Electronic Service		No	21-565Official Service List
49	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	21-565Official Service List
50	Laura	Haight	lhaight@pfpi.net	Partnership for Policy Integrity		POB 2513 Amherst MA, 01004 United States	Electronic Service		No	21-565Official Service List
51	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
52	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	21-565Official Service List
53	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	21-565Official Service List
54	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
55	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	21-565Official Service List
56	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
57	Megan	Hoye	megan.hoye@minneapolismn.gov	City of Minneapolis		505 Fourth Ave S.	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55415 United States				Service List
58	Jon	Hunter	jon.hunter@lung.org	American Lung Association		490 Concordia Ave Saint Paul MN, 55103 United States	Electronic Service		No	21-565Official Service List
59	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-565Official Service List
60	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
61	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21-565Official Service List
62	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
63	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
64	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	21-565Official Service List
65	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	21-565Official Service List
66	D	Kalmon	dkalmon@mwrmo.org	Mississippi Watershed Management Organization		2522 Marshall St NE Minneapolis MN, 55418-3329 United States	Electronic Service		No	21-565Official Service List
67	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	21-565Official Service List
68	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
69	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	21-565Official Service List
70	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	21-565Official Service List
71	Mark	Kresowik	mkresowik@aceee.org	American Council for an Energy-Efficient Economy		529 14th St NW, Suite 600 Washington DC, 20045 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
72	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
73	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
74	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
75	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	21-565Official Service List
76	Robert	Lems	administration@dm-tcgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	21-565Official Service List
77	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	21-565Official Service List
78	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
79	Margaret	Levin	margaret.levin@sierraclub.org	Sierra Club North Star Chapter		2300 Myrtle Ave Ste 260 St. Paul MN, 55114 United States	Electronic Service		No	21-565Official Service List
80	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-565Official Service List
81	Sydney	Lieb	sydney.lieb@state.mn.us		Department of Commerce	85 7th Place East, Suite 280 St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
82	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
83	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21-565Official Service List
84	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
85	Emily	Marshall	emarshall@tourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
86	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	21-565Official Service List
87	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
88	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	21-565Official Service List
89	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	21-565Official Service List
90	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	21-565Official Service List
91	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-565Official Service List
92	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	21-565Official Service List
93	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
94	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-565Official Service List
95	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
96	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
97	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
98	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	21-565Official Service List
99	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
100	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
101	Will	Nissen	wnissen@mncee.org	Center for Energy and Environment			Electronic Service		No	21-565Official Service List
102	Curtis	Nordgaard	nordgaard@fresh-energy.org	Fresh Energy		408 Saint Peter Street Suite 350 St Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
103	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-565Official Service List
104	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
105	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	21-565Official Service List
106	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
107	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
108	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	21-565Official Service List
109	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	21-565Official Service List
110	Bret	Pence	bretpence@mnipl.org	Minnesota Interfaith Power and Light		106 Waverly Place Duluth MN, 55803 United States	Electronic Service		No	21-565Official Service List
111	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
112	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List
113	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	21-565Official Service List
114	Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	21-565Official Service List
115	Lauren	Reeg	lreeg@rmi.org	RMI		806 N Pinyon Ct. Hartland WI, 53029 United States	Electronic Service		No	21-565Official Service List
116	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	21-565Official Service List
117	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	21-565Official Service List
118	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	21-565Official Service List
119	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	21-565Official Service List
120	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	21-565Official Service List
121	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
122	Kathleen	Schuler	kathleen@hpforhc.org	Health Professionals for a Healthy Climate		Health Professionals for a Healthy Climate PO Box 583013 Minneapolis MN, 55458-3013 United States	Electronic Service		No	21-565Official Service List
123	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	21-565Official Service List
124	Patrick	Serfass	pserfass@tcorp.com	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
125	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
126	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	21-565Official Service List
127	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
128	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	21-565Official Service List
129	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	21-565Official Service List
130	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	21-565Official Service List
131	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
132	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	21-565Official Service List
133	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	21-565Official Service List
134	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
135	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
136	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
137	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
138	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
139	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
140	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-565Official Service List
141	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	21-565Official Service List
142	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	21-565Official Service List
143	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	21-565Official Service List
144	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L Street #513 Sacramento CA, 95814 United States	Electronic Service		No	21-565Official Service List
145	Jenna	Warmuth	jenna@rewiringamerica.org	Rewiring America		3218 Georgia Ave NW, Suite 1 Washington DC, 20011 United States	Electronic Service		No	21-565Official Service List
146	Nicole	Westling	nicole.westling@state.mn.us		Department of Commerce	85 7th Place E Suite 280 St Paul MN, 55001 United States	Electronic Service		No	21-565Official Service List
147	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	21-565Official Service List
148	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	21-565Official Service List
149	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
150	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	21-565Official Service List
151	Mariko	Yatsuhashi	myatsuhashi@mncee.org	Center for Energy and Environment		212 N 3rd Ave Suite 560 Minneapolis MN, 55404 United States	Electronic Service		No	21-565Official Service List

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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	7-1199Official
2	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	7-1199Official
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	7-1199Official
4	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	7-1199Official
5	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	7-1199Official
6	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	7-1199Official
7	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	7-1199Official
8	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	7-1199Official
9	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		Yes	7-1199Official
10	Barb	Freese	bfreese@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55104-3435 United States	Electronic Service		No	7-1199Official
11	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	7-1199Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
12	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402- 1425 United States	Electronic Service		No	7- 1199Official
13	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902- 3303 United States	Electronic Service		No	7- 1199Official
14	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	7- 1199Official
15	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07- MCA Minneapolis MN, 55401 United States	Electronic Service		No	7- 1199Official
16	Craig	McDonnell	craig.mcdonnell@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Road St. Paul MN, 55101 United States	Electronic Service		No	7- 1199Official
17	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	7- 1199Official
18	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	7- 1199Official
19	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	7- 1199Official
20	Peter	Nelson	peter.nelson@americanexperiment.org	Center of the American Experiment		8441 Wayzata Boulevard Suite 350 Golden Valley MN, 55426 United States	Electronic Service		No	7- 1199Official
21	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	7- 1199Official
22	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351	Electronic Service		No	7- 1199Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
23	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	7-1199Official
24	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	7-1199Official
25	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	7-1199Official
26	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	7-1199Official
27	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	7-1199Official
28	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	7-1199Official
29	Karen	Tyler	ktyler@nd.gov	Industrial Commission of North Dakota		14th Floor 600 E. Boulevard Avenue, Dept. 405 Bismarck ND, 58505 United States	Electronic Service		No	7-1199Official
30	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	7-1199Official
31	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	7-1199Official