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September 9, 2024

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

VIA ELECTRONIC FILING

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

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

Minnesota Energy Resources Corporation's Preferred Decision Options

Dear Mr. Seuffert:

On August 30, 2024, the Minnesota Public Utilities Commission (the "Commission") issued a Notice of Agenda Meeting for September 12, 2024 with the above-referenced dockets being placed on the agenda. Commission Staff filed Briefing Papers on August 29, 2024.

Minnesota Energy Resources Corporation ("MERC" or the "Company") thanks the parties for their efforts in this matter and Commission Staff for their comprehensive Briefing Papers and analysis.

In light of the significant number of decision options presented by Staff for the Commission to review, and in the spirit of efficiency, MERC is providing here the decision options the Company supports, and also calls out instances of substantive opposition to specific decision options. Again, in an effort to provide streamlined information to the Commission, MERC is not directing attention to decision options the Company does not oppose nor takes no position. While MERC understands some Parties will be filing joint comments on the decision options and MERC was invited to join those Parties, MERC was unable to do so because there were multiple decision options supported by those Parties that MERC does not support.

CEE Proposed Decision Option

Based on the Company's understanding from stakeholder discussions at the September 6, 2024 Gas Utility Innovation Roundtable meeting that Center for Energy and Environment ("CEE") is proposing one new, consolidated decision option (shown below), and that stakeholders are in agreement that the CEE Proposed Decision Option captures and consolidates the following decision options in Staff's August 29, 2024 Briefing Papers: 4, 5, 6, 7, 8, 9, 10, 33, 34, 35, 36, 37, 38, 98, and 99. Therefore MERC addresses the CEE Proposed Decision Option, and the Company does not address any of those decision options. MERC supports CEE's Proposed Decision Option:

New CEE Proposed Decision Option: *In developing their Integrated Resource Plan, the utilities will engage with stakeholder groups to provide information about the utilities' planning process and Expansion Alternative Analysis project selection, answer stakeholder questions, and seek stakeholder feedback to inform the resource plan. The stakeholder groups shall include, at minimum, relevant state agencies, clean energy advocates, consumer advocates, low-income and environmental justice advocates, organized labor, local governments, and business, and communities directly impacted by Expansion Alternative Analysis projects. In each resource plan, natural gas utilities will provide a narrative description of its outreach and engagement activities and a summary of stakeholder feedback.*

MERC Preferred Decision Options

1. Require gas utilities to include in their integrated resource plan a discussion of how equity was considered in the planning process.
14. Adopt a two-year cadence between the filings of the Initial Gas IRPs of Xcel on October 1, 2026, and CenterPoint Energy on October 1, 2028, and a one-year cadence for MERC to file its Initial Gas IRP on October 1, 2029. After all of the Gas Utilities have filed their initial Gas IRPs, the filing cadence would then follow the Commission's Order Point 21 from the March 27, 2024 Order.
15. Clarify that, as used in ordering paragraph 51 of the Commission's March 27, 2024 order in these dockets, "infrastructure costs" are the capital costs the utility would pay to do the project.
19. Replace the section title immediately preceding ordering paragraph 51 of the Commission's March 27, 2024 Order in these dockets with the following:
Expansion Alternatives Analysis
- 21, 21.C. Replace ordering paragraph 51 of the Commission's March 27, 2024 Order in these dockets with the following: Integrated resource plans shall include an

analysis of infrastructure projects related to individual projects, or a set of inter-related facilities needed to meet a specified capacity expansion need due to growth by existing or new customers and facilities at or above a threshold of [____].

C. \$1 million for MERC

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

61. Modified: To estimate environmental externality costs of resource options in gas IRPs, ~~require~~ ~~utilities to shall~~ use the most recent externality values adopted by the Commission in Docket No. E-999/CI-14-643.

68. Delegate authority to the Executive Secretary to open a comment period in Docket Number E999/CI-07-1199 to consider and determine the appropriate data source and values for the regulatory cost of greenhouse gas emissions for natural gas resource planning through the upcoming docket to update the regulatory cost of carbon for electric resource planning.

87. Modified: Allow utilities deferred accounting treatment of costs associated with ~~developing and implementing~~ a Gas IRP ~~for costs that are above and beyond what are being recovered in base rates. process for reporting, conducting a Gas IRP, the costs associated with the regulatory process for the Gas IRP filings, and implementing a Gas IRP once approved by the Commission.~~

MERC continues to request the Commission allow deferred accounting treatment for costs associated with the Gas IRP. Given that the Gas IRPs will be an on-going, iterative process that will evolve over time, and that the Gas Utilities could potentially have filed rate cases inclusive of costs associated with the Gas IRP during the on-going timeframe, MERC recommends a Modified Decision Option 87, as shown above.

94. Modify ordering paragraph 36 of the March 27, 2024 Order in these dockets as follows: A utility shall include in its resource plan filing a nontechnical summary, not exceeding 25 pages in length, describing the utility's resource needs, the resource plan created by the utility to meet those needs, the process and analytical techniques used to create the plan, activities required over the next five years to implement the plan, and the likely effect of plan implementation on ~~electric~~ rates and bills.

96. Clarify that for purposes of gas IRPs, "near-term" means within five years.

101. Authorize the Executive Secretary to create a "Comprehensive Gas IRP Requirements" document which reconciles the gas IRP requirements established

in the Framework Order filed March 27, 2024, and the additions and modifications to those requirements made above, and issue the document as an attachment to the Order. Delegate continuing authority to the Executive Secretary to update the Comprehensive Gas IRP Requirements document to reflect any future modifications or additions to the gas IRP requirements established in future Commission decisions, to be filed as an attachment to future orders establishing such changes.

MERC Opposed Decision Options

12: Require the gas utilities required to file gas IRPs to plan for the establishment of decommissioning trust funds and maintain sufficient decommissioning funds to cover any future liabilities arising from abandonment of gas infrastructure.

Such an order point here is not required because in the normal course of establishing depreciation rates, utilities establish a cost of removal reserve to cover the cost of decommissioning facilities upon their retirement. Any adjustment to those amounts are more appropriately included a depreciation rate docket.

24, 24A-C.: Require each utility to follow the following process to create a project pool for its EAA:

- A.** First, the preliminary screening of forecasted infrastructure investments identifies projects for alternatives analyses that are more likely to be feasible and executable based on safety, cost, and timing.
- B.** Next, to assess whether an alternatives project is technically viable, a utility procures and assembles eligible resources into a portfolio.
- C.** Finally, a utility evaluates the alternatives portfolio using a benefit-cost test, qualitative vendor criteria, and equity analysis.

MERC does not agree with such a prescriptive approach at this point in time. As has been stated earlier this docket, the IRP process will be iterative in nature and as the utilities, Parties and the Commission gain experience with IRPs the additional elements can be added *after* that experience is gained.

26: Encourage utilities to consider expansion alternatives for projects related to safety and reliability, public works accommodation, routine maintenance, and integrity.

Decision Option 26 is in direct conflict with the Commission's March 27, 2024 Order Point 55 in the above-referenced dockets, which explicitly does not include such projects in the scope of IRPs and reads "*Distribution system investments related to*

routine maintenance, public works accommodation, integrity, reliability, and safety are not part of the integrated resource planning process or analysis.”

30, 30A-C.: Require that an expansion alternatives analysis consider the following, adapted from requirements for new business and capacity expansion projects in Colorado's Gas Infrastructure Plans

A. one or more applicable clean heat resources;

B. a cost-benefit analysis including the costs of direct investment and the social costs of carbon and methane for emissions due to or avoided by the alternative, and other costs determined appropriate by the Commission;
and

C. available employment metrics associated with each alternative, including a projection of gas distribution jobs affected by the alternative and jobs made available through the alternative, opportunities to transition any affected gas distribution jobs to the alternative, pay and benefit levels of the affected gas distribution.

32: For projects above the investment threshold for the expansion alternatives analysis, require the utility to explain why the projects selected for a full alternatives evaluation were prioritized over the projects that were not selected for a full alternatives evaluation.

42: Require utilities when selecting projects for EAAs to consider the disparate impacts of gas system emissions on various communities, and whether low- and moderate-income households will benefit from an alternative through bill savings, air quality improvements, or other direct benefits.

43: Require utilities required to file gas IRPs to prioritize rural low-income communities for clean heating options when replacing propane, fuel oil, or wood heating.

44: Instate a moratorium on expansion into low-income communities.

45: Require an EAA for each expansion project proposed in an environmental justice community with significant numbers of BIPOC residents, low-income residents, or any expansion in Indian Country or indigenous communities.

Regarding decision options 30, 30A-C, 32, 42, 43, 44, and 45, MERC does not agree with such a prescriptive approach at this point in time. As has been stated earlier this docket, the IRP process will be iterative in nature and as the utilities, Parties and the Commission gain experience with IRPs the additional elements can be added *after* that experience is gained.

50: Require utilities to fully account for historic impacts on low-income communities and communities of color as a part of their gas IRPs

If the Commission's objective in requiring gas utilities to complete and file Gas IRPs is to determine what *future* investments are needed to serve customers reliably and economically, such a historic view would provide no relevant record evidence and would therefore increase the costs and efforts of filing utilities and Parties without commensurate benefit.

53: Require gas utilities required to file gas IRPs to work with gas suppliers to improve transparency in reporting of upstream methane emissions.

Imposing such a requirement on the gas utilities where they don't have any direct control over would be unreasonable. For example, if one utility were to have a supplier that was not able to or refused to provide such information what would its remedy be? If the Commission were to desire such information be provided, a more reasonable approach would be to require the utilities to present public-available information made available by their suppliers.

55: After discussing with stakeholders, utilities required to file gas IRPs shall explain how they are measuring and defining distribution, upstream, and lifecycle emissions. Utilities shall provide this information in a compliance filing made within 90 days of the issuance of this Order.

Please see response to decision option 53.

57: Require **each utility** in its gas IRP to report on all emissions from distribution system operations and upstream emissions using recognized reporting protocols and available tools, including the EPA's protocol Subpart W referenced by Xcel and the Department, as well as additional data from the National Energy Technology Laboratory, Energy Information Administration, GREET model, and other sources.

Please see response to decision option 53.

60: Require utilities required to file gas IRPs to select a preferred plan that advances climate goals.

As a regulated natural gas utilities, under Minnesota law, the Gas Utilities are required to provide safe, reliable and affordably service to its customers. Such a decision option ignores those and could result in IRPs that do not meet those requirements.

67: Require utilities required to file gas IRPs to use the regulatory cost of carbon emissions established in response to Minn. Stat. § 216H.06 to account for future regulation of carbon emissions.

A. Utilities required to file gas IRPs shall also add 1.4% to the commodity cost of gas to account for methane regulatory costs.

While MERC does not oppose Decision Option 67, it believes that Decision Option 67 A is too prescriptive and may not be an accurate reflection of costs for a particular supplier or all suppliers over time.

72: Require utilities to include in each gas IRP an analysis of the mortality and morbidity caused by continued gas use in residences and businesses.

73: Delegate authority to the Executive Secretary to issue a Notice of Comment to set indoor gas use externality values based on the current medical science reflecting the serious damage done to the most vulnerable members of our society by continued indoor gas combustion.

Regarding decision options 72 and 73, MERC does not agree with such a prescriptive approach at this point in time. As has been stated earlier this docket, the IRP process will be iterative in nature and as the utilities, Parties and the Commission gain experience with IRPs the additional elements can be added *after* that experience is gained.

75: Require utilities required to file gas IRPs to collaboratively develop forecast methodologies with stakeholders through Great Plains Institute's Gas Utility Innovation Roundtable.

The Company believes that including the topic of developing forecast methodologies in the Gas IRP dockets is beyond the scope of the IRP docket as defined by the Commission. Gas Utilities are required to provide forecasts in many other dockets (rate cases, demand entitlement, etc.) and adding such a requirement in this docket would likely lead to disconnected forecasts that could have unintended consequences in other dockets that directly impact customer costs.

79: Require utilities to express demand as a function of heating needs in their gas IRPs.

Commercial and industrial customers rely upon natural gas service for their business needs; it would not be accurate to express demand as a function of heating needs.

80 and subparts A-E.: Require utilities, in each gas integrated resource plan, to indicate how the utility load and customer forecasts incorporate, to the extent practicable, relevant external factors including, but not limited to:

A. the effect of current or enacted state and local building codes and standards;

B. building electrification, efficient fuel-switching, and energy efficiency programs or incentives offered by both the gas utility and the local electric

utility or local, state, or federal entities that overlap with the utility's gas service territory;

C. the effects of rate design and/or demand response programs;

D. changes in the utility's line extension policies, and the associated impact on gas customer growth; and

E. the price elasticity of demand (e.g., the impact of reduced throughput and rate increases on sales and peak demand requirements and impacts of commodity prices).

MERC does not agree with such a prescriptive approach at this point in time. As has been stated earlier this docket, the IRP process will be iterative in nature and as the utilities, Parties and the Commission gain experience with IRPs the additional elements can be added *after* that experience is gained.

92: Require each utility, in its first gas IRP, to evaluate ways to incorporate public data and mapping tools for low-income residents or disadvantaged communities in this IRP process.

MERC views decision option 92 as being duplicative of decision options 40 and 41.

93: Require utilities to delineate the extent to which their resource plans will impact environmental justice communities, including the portion of project emissions that would be located within environmental justice communities.

MERC does not agree with such a prescriptive approach at this point in time. As has been stated earlier this docket, the IRP process will be iterative in nature and as the utilities, Parties and the Commission gain experience with IRPs the additional elements can be added *after* that experience is gained.

95: Require Xcel, CenterPoint Energy, and MERC to work with electric utilities in their service territories to understand, to the extent possible, the electric system impacts on resource options in the natural gas IRPs.

MERC does not agree with this approach at this point in time due to being administratively burdensome. As stated and shown in Figure 1 of MERC's November 30, 2023 Comments filed in the above-referenced dockets, natural gas service territory overlaps with the electric service territories of over 175 municipalities, cooperatives, and investor-owned utilities ("IOUs") in the State of Minnesota. To request the natural gas utilities to work with all of the electric utilities in their service territories regarding all resource options depicted in the Gas IRP would be extreme.

If the Commission chooses for the gas utilities to conduct outreach efforts with electric utilities, MERC recommends that the Commission limit such efforts to only the EAA. This approach would reduce the amount of cost and effort required, and also remains in

alignment with the IRP process being iterative in nature, and as the utilities, Parties and the Commission gain experience with IRPs additional elements can be added after that experience is gained. As such, MERC proposes a Modified 95 decision option:

MERC Modified 95: Require Xcel, CenterPoint Energy, and MERC to work with electric utilities in their service territories to understand, to the extent possible, the electric system impacts on **EAA** resource options in the natural gas IRPs.

97: Require each utility to use a consistent methodology in its gas IRPs to calculate the “all-in” costs of resources to allow for an apples-to-apples comparison.

MERC does not believe this decision option is needed, as it is redundant with various decision options presented by Staff in their August 29, 2024 Briefing Papers filed in the above-referenced dockets which detail cost inclusions for the Gas IRP.¹ Additionally, based on the Company’s understanding from stakeholder discussions at the September 6, 2024 Gas Utility Innovation Roundtable meeting, Citizens Utility Board of Minnesota (“CUB”) and CEE are proposing a new decision option “A” that would also provide clarification of costs to be included in the Gas IRP. Lastly, the Company points out that approving decision option 97 may cause unneeded confusion and misalignment within the Gas IRP process dependent upon the Commission’s approval or denial of these various proposed decision options that are proposing detailed costs inclusions. Therefore MERC does not believe decision option 97 is necessary.

Please contact me at (414) 221-3685 or Richard.Stasik@wecenergygroup.com if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely,



Richard F. Stasik
Director—State Regulatory Affairs

cc: Service Lists

¹ Decision Options: 15, 61, 63, 64, 65, 66, 67, 69, 70, and 71.

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

Docket No. G008, G002, G011/CI-23-117

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

Docket No. G999/CI-21-565

CERTIFICATE OF SERVICE

I, Kristin M. Stastny hereby certify that on the 9th day of September, 2024, on behalf of Minnesota Energy Resources Corporation (“MERC”), I electronically filed a true and correct copy of the enclosed Letter on www.edockets.state.mn.us. This document was also served via U.S. mail and electronic service as designated on the attached service lists.

Dated this 9th day of September, 2024.

/s/ Kristin M. Stastny

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Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-565_Official Service List
Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce	401 N Robert Street Suite 150 St Paul, MN 55101	Electronic Service	No	OFF_SL_21-565_Official Service List
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-565_Official Service List
Robert	Lems	administration@dm-tcgs.com	DMT Clear Gas Solutions	19125 SW 125th Ct Tualatin, OR 97062	Electronic Service	No	OFF_SL_21-565_Official Service List
Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello	505 Walnut St Ste 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_21-565_Official Service List
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-565_Official Service List
Amy	Liberkowsky	amy.a.liberkowsky@xcenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-565_Official Service List
Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-565_Official Service List
Emily	Marshall	emarshall@mojlaw.com	Miller O'Brien Jensen, PA	120 S. 6th Street Suite 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute	N/A	Electronic Service	No	OFF_SL_21-565_Official Service List
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-565_Official Service List
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, MB R3C 2P4 CANADA	Electronic Service	No	OFF_SL_21-565_Official Service List
Taylor	McNair	taylor@gridlab.org		668 Capp Street San Francisco, CA 94110	Electronic Service	No	OFF_SL_21-565_Official Service List
Sarah	Mead	sarah.mead@wecenergygroup.com	MERC	N/A	Electronic Service	No	OFF_SL_21-565_Official Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-565_Official Service List
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-565_Official Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-565_Official Service List
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David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-565_Official Service List
M. William	O'Brien	bobrien@mojaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
Ric	O'Connell	ric@gridlab.org	GridLab	2120 University Ave Berkeley, CA 94704	Electronic Service	No	OFF_SL_21-565_Official Service List
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-565_Official Service List
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-565_Official Service List
Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC	3330 Washington Blvd Ste 400 Arlington, VA 22201	Electronic Service	No	OFF_SL_21-565_Official Service List
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-565_Official Service List
Bret	Pence	bretpence@mnipl.org	Minnesota Interfaith Power and Light	106 Waverly Place Duluth, MN 55803	Electronic Service	No	OFF_SL_21-565_Official Service List
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-565_Official Service List
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Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, MN 55117	Electronic Service	No	OFF_SL_21-565_Official Service List
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_21-565_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_21-565_Official Service List
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_21-565_Official Service List
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Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications	2378 Wilshire Blvd. Mound, MN 55364	Electronic Service	No	OFF_SL_21-565_Official Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Andrew R.	Shedlock	Andrew.Shedlock@KutakRock.com	Kutak Rock LLP	60 South Sixth St Ste 3400 Minneapolis, MN 55402-4018	Electronic Service	No	OFF_SL_21-565_Official Service List
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_21-565_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas	1017 L Street #513 Sacramento, CA 95814	Electronic Service	No	OFF_SL_21-565_Official Service List
Nicole	Westling	nicole.westling@state.mn.us	Department of Commerce	85 7th Place E Suite 280 St Paul, MN 55001	Electronic Service	No	OFF_SL_21-565_Official Service List
Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group	605 Highway 169 N Ste 1200 Plymouth, MN 55441	Electronic Service	No	OFF_SL_21-565_Official Service List
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_21-565_Official Service List
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
Tim	Wulling	t.wulling@earthlink.net		1495 Raymond Ave. Saint Paul, MN 55108	Electronic Service	No	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_21-565_Official Service List
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	ross.abbey@us-solar.com	United States Solar Corp.	100 North 6th St Ste 222C Minneapolis, MN 55403	Electronic Service	No	OFF_SL_23-117_Official List
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Jorge	Alonso	jorge.alonso@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
Jose	Alvillar	jose@unidos-mn.org	Unidos-MN	N/A	Electronic Service	No	OFF_SL_23-117_Official List
Gary	Ambach	Gambach@slipstreaminc.org	Slipstream, Inc.	8973 SW Village Loop Chanhassen, MN 55317	Electronic Service	No	OFF_SL_23-117_Official List
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_23-117_Official List
Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato	P.O. Box 3368 Mankato, MN 560023368	Electronic Service	No	OFF_SL_23-117_Official List
Mara	Ascheman	mara.k.ascheman@xcenergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-117_Official List
James H.	Barkley	james.barkley@bakerbotts.com	Baker Botts	910 Louisiana Street Houston, TX 77002-4995	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Randall	Beck	RBeck3@wm.com	Waste Management Renewable Energy, L.L.C.	1021 Main St Houston, TX 77002	Electronic Service	No	OFF_SL_23-117_Official List
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Alicia	Berger	Alicia.E.Berger@xcelenerg y.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-117_Official List
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Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_23-117_Official List
Jocelyn	Bremer	jocelyn.bremer@minneapol ismn.gov	City of Minneapolis	350 S Fifth St Ste 210 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_23-117_Official List
Tim	Brinkman	tim.brinkman@gvtel.net	Garden Valley Telephone Company - Coop	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org		Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_23-117_Official List
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_23-117_Official List
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_23-117_Official List
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Sheri	Comer	Sheri.comer@ftr.com	Frontier Communications Corporation	1500 MacCorkle Ave SE Charleston, WV 25396	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-117_Official List
Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350	729 6th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_23-117_Official List
Noah	Cordoba	noah@buildingdecarb.org	Building Decarbonization Coalition	33594 Herring View Drive Lewes, Delaware 19958	Electronic Service	No	OFF_SL_23-117_Official List
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_23-117_Official List
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 St. Paul, MN 55104	Electronic Service	No	OFF_SL_23-117_Official List
Seth	DeMerritt	Seth.DeMerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-117_Official List
Tom	Dicklich	tdicklich@mnrtrades.org	Minnesota Building & Construction Trades Council	353 W. 7th St Rm 105 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_23-117_Official List
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
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Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_23-117_Official List
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Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_23-117_Official List
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BEAU	GRIFFEY	bgriffey@id8energy.com	iD8 Energy Group, LLC	1799 County Rd 90 N Maple Plain, MN 55395	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_23-117_Official List
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David	Kailbourne	EDK@REVLNG.COM	REV LNG, LLC	1002 Empson Rd Ulysses, PA 16948	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Frank	Kohlasch	frank.kohlasch@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N. St. Paul, MN 55155	Electronic Service	No	OFF_SL_23-117_Official List
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
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Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce	401 N Robert Street Suite 150 St Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
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Andrew	Larson	andrew.m.larson@state.mn.us	Public Utilities Commission	121 7th Place E., #350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-117_Official List
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Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello	505 Walnut St Ste 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Taylor	McNair	taylor@gridlab.org		668 Capp Street San Francisco, CA 94110	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_23-117_Official List
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Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
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Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-117_Official List
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_23-117_Official List
Jessica	Palmer Denig	jessica.palmer- Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_23-117_Official List
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J. Gregory	Porter	greg.porter@nngco.com	Northern Natural Gas Company	1111 South 103rd St Omaha, NE 68124	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_23-117_Official List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-117_Official List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_23-117_Official List
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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