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July 19, 2024

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

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

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

REPLY COMMENTS OF CENTERPOINT ENERGY MINNESOTA GAS

Dear Mr. Seuffert:

Pursuant to the Minnesota Public Utilities Commission's ("the Commission") May 7, 2024, Extended Notice of Comment Period ("Notice") in the above-captioned dockets, CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or "the Company") filed a Straw Proposal regarding additional filing requirements for gas utility resource planning in Minnesota on May 31, 2024. On June 28, 2024, several parties, including Building Decarbonization Coalition ("BDC"), Center for Energy and Environment ("CEE"), Clean Energy Organization ("CEO"), Citizens Utility Board ("CUB"), Department of Commerce ("DOC"), Office of the Attorney General – Residential Utilities Division ("OAG") (together referred to as "Parties"), as well as utilities Minnesota Energy Resources Corporation ("MERC"), Xcel Energy ("Xcel"), and CenterPoint Energy (together referred to as "Utilities") filed Initial Comments addressing the utilities' Straw Proposals.

These Reply Comments to the Parties' Initial Comments are submitted by the Company and are organized in a way to respond to specific topics as opposed to each individual filer of Initial Comments. Exclusion of specific topics from the Parties' Initial Comments within these Reply Comments does not represent agreement or disagreement with any particular topic.

Five Year Action Plan

In their Straw Proposal, Xcel requested "high-level details on what would be included in the five-year action plan to level expectations" and recommended including justification of need, resource mix, project scope, construction timeline, and cost estimates. In their Initial Comments CUB, DOC and CEE were supportive of Xcel's proposal. Additionally, CUB also recommended Utilities be required to include a narrative discussion of potential project equity impacts. Finally, CEO proposes an additional decision option to ensure Utilities are using a standardized cost comparison, as well as including the environmental externality values from Docket 14-643. The proposed decision option by CEO would read:

The Commission should require utilities to use a consistent methodology to calculate the “all-in” costs of resources to allow for an apples-to-apples comparison.

CenterPoint Energy agrees with Xcel’s Straw Proposal comments on this topic. The Company is not supportive of CEO’s additional proposed decision option to include “all-in” costs inclusive of externality costs in the five-year action plan. Specifically, operation and maintenance type of expenses will occur well beyond the Gas Integrated Resource Plan (“IRP”) planning horizon, and estimation of these costs will be subject to a assumptions and, therefore, variability as compared to the near-term infrastructure costs. Finally, CenterPoint Energy is also supportive of including an equity narrative of these projects as suggested by CUB.

Greenhouse Gas Emissions Reduction Goals

In their Initial Comments, CUB asks the Utilities to provide additional description of how emission factors from their Natural Gas Innovation Act (“NGIA”) plans will be considered in the resource analysis and provide a narrative of how their preferred IRP is estimated to meet net zero by 2050, or if it is not, why it is still the preferred plan. Meanwhile, CEO urges the Commission to adopt a decision option that would require Utilities to include in their resource plans a narrative description of how the Utilities’ preferred plan will enable them to serve the state’s greenhouse gas emission reduction goals. Furthermore, the DOC and CEE were supportive of Xcel’s proposed decision option that reads:

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

CenterPoint Energy believes Minnesota’s natural gas utilities play a critical role in supporting our state’s greenhouse gas reduction goals, recognizing that these goals are for the entire state economy. The Company supports Xcel’s expanded requirement from Commission Order Point 4 from the March 27, 2024, Order which states the scope of the IRP should consider the state’s economy-wide greenhouse gas reduction statutory goals. The Company does not support that each Utility’s IRP must meet the net zero by 2050 economy-wide state goal. Additionally, CenterPoint Energy supports the inclusion of lifecycle GHG emissions factors from filed NGIA plans in resource analysis included in Xcel’s proposed decision option. The Company agrees this is consistent with the Commission-established lifecycle greenhouse gas accounting framework in Docket No. G999/CI-21-566 and will provide consistency across the Company’s NGIA innovation plan and future IRP.

Regulatory Cost of Carbon Dioxide Emissions

In association with Order Point 15 in the Commission’s March 27, 2024, Order in this docket, CEE requested Parties’ comment on the appropriateness of applying either the regulatory cost of carbon established through Minnesota Statute § 216H.06 or the natural gas environmental compliance factor applied through Energy Conservation and Optimization (“ECO”) to natural gas IRPs through reply comments.

If the Commission were to consider guidance for the appropriate values or factors to apply to natural gas IRPs to estimate the costs of existing and future regulation of greenhouse gas

emissions, CenterPoint Energy recommends additional analysis and a regulatory proceeding would be necessary. To the Company's current knowledge, the ECO cost-effectiveness framework including consideration of environmental compliance costs associated with natural gas is the only framework created for natural gas utilities and would be the Company's preference based on existing frameworks. CenterPoint Energy has reservations applying the Commission-established range of regulatory costs of carbon dioxide emissions for electric IRPs, as they were created with the specific intent for electricity generation.

Externality Costs

In their Initial Comments, CUB asks the Utilities to share additional explanation of how, and to what extent, they intend to incorporate externality costs into their IRP analysis. Additionally, CEO recommends the following proposed decision option regarding externality costs to assist with an apples-to-apples comparison of the Expansion Alternative Analysis ("EAA"):

The Commission should clarify that [U]tilities should include externalities in scenarios in the same manner that electric utilities do to the greatest extent possible.

CenterPoint Energy, proposes to use the \$/short ton CO₂e as addressed in the Commission's January 26, 2024, Notice and the December 19, 2023, Commission Order in Docket No. E999/CI-14-643 as additional costs considered in the EAA the Company provides within the IRP. CenterPoint Energy recommends denial of this suggested CEO decision option, as it is the Company's understanding from discussions with other utilities that the electric utilities provide a range of sensitivity analysis on generation that is not applicable to the gas industry. Further, the Company is not aware of what tools are, or will be, available to address externalities and therefore does not want to limit what Utilities can do before the first IRP is filed.

Load Forecast

Regarding load forecasting, CUB recommends rejection of the Company's proposed decision option 40.a. citing the Company's characterization that its goal of ensuring reliability is not done through load forecasting and that additionally all forecast scenarios should consider resources in addition to natural gas. The DOC also recommends rejection of CenterPoint Energy's proposed decision option 40.a., specifically addressing the difference in planning horizons of the IRP versus other utility dockets.

Meanwhile, the OAG states it has no objection to using design day and sales forecasts approved by the Commission and offers the following modification to the Company's proposed decision option 40.a.:

40.a. Where the high load forecast may represent the **Company's Commission-approved** forecast for design day as provided in **their the utilities'** most recent demand entitlement filing, and **the Commission-approved** sales forecast as provided in the **utilities'** most recent rate case.

CEO recommended the Commission set parameters to ensure accurate load forecasts and, along with this recommendation, included the following proposed decision alternative:

Each integrated resource plan submitted by a gas utility must indicate how the utility load and customer forecasts incorporate, to the extent practicable, relevant

external factors including, but not limited to: (1) the effect of current or enacted state and local building codes and standards; (2) 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; (3) the effects of rate design and/or demand response programs; (4) changes in the utility's line extension policies, and the associated impact on gas customer growth; and (5) 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).

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

In response to the concerns raised by CUB and DOC, the Company has filed clarification in its Initial Comments clarifying that a variety of resources will be considered when meeting the demands of our customers, and addressing how the various planning horizons can work together. In these Reply Comments, the Company clarifies the true intent of this proposed Order Point is to not create conflicting forecasts in the variety of dockets that are filed by the Utilities. In further discussions with CUB, CUB clarified their expectation was for demand side resources to be compared to supply side resources, and not in the forecast scenarios. The Company appreciates CUB's further clarification in these discussions and notes the original proposal intended to address the demand side resources post-forecast scenarios consistent with Order Point 44 in the Commission's March 27, 2024, Order in this docket. Additionally, CenterPoint Energy is supportive of the OAG's recommended modifications to the Company's proposed decision option as it creates consistency with the Utilities' other dockets.

Regarding CEO's decision option, the Company does not agree additional clarification of the Commission's March 27, 2024, Order regarding load scenarios is required prior to the Utilities completing their first IRP. The Utilities are required to include assumptions used to develop load forecasts in the IRP and the Company understands this direction to be clear to incorporate a broad list of potential factors. Therefore, the Company recommends rejection of CEO's proposed decision option.

Finally, the Company continues to have concerns regarding the likelihood of coordinating with electric utilities in a meaningful matter to incorporate those activities into any type of forecasting scenarios.

Energy Efficiency

CUB supports Xcel's two proposed decision options related to energy efficiency with a modification to Xcel's send-proposed decision option as redlined below, while the DOC and CEE supports Xcel's proposed decision options with no additional modifications. Additionally, CEE strongly encourages shell energy efficiency measures like air sealing and insulation.

Proposed decision option [1]: To treat energy efficiency alongside all other energy resource options, utility integrated resource plans should evaluate energy efficiency achievement scenarios including expected program achievement to maximum achievement.

Proposed decision option [2]: The appropriate and cost-effective level of future energy efficiency procurement shall correspond to the maximum program spending level that remains cost-effective when compared to ~~supply-side~~ alternatives.

CenterPoint Energy, is also supportive of Xcel's proposed decision options, inclusive of the CUB modification, and will continue to evaluate opportunities for air sealing and insulation.

EAA

CUB supports Xcel's recommendation that utilities be required to include a narrative discussion of the rationale for the projects selected for the EAA. Meanwhile, CEO includes the following proposed decision option as to not strictly prohibit safety and reliability projects from consideration for EAA:

Utilities shall employ a cost threshold that casts a wide net of projects for consideration for alternatives analyses for initial resource plans.

Additionally, CEO recommended the following decision options regarding discussion of why a project was selected or not selected for EAA:

For projects above the investment threshold for the expansion alternatives analysis, a utility shall provide a full alternatives evaluation or justify why the project was not selected for a full alternatives evaluation.

Each utility must include a summary of its discussions with stakeholders regarding the selection of projects for the expansion alternatives analysis.

Finally, CEO included the following proposed decision option for EAA to address the minimum elements to include in an alternatives analysis:

A full alternatives evaluation, as required by Order Point 54 of the Commission's March 27 Order, shall include non-pipeline alternatives and/or non-natural-gas alternatives; costs and benefits of those alternatives including the costs of direct investment, variable costs, and the social costs of carbon and methane for emissions due to or avoided by the alternative; a thorough and transparent explanation of the criteria used to rank or eliminate such alternatives; and an explanation of how equity was considered.

CenterPoint Energy is supportive of the recommendation to include a narrative discussion of the rationale for the EAA projects selected.

The Company is also agreeable to CEO's proposed decision option to include a summary of the discussions the Company held with stakeholders regarding the selection of projects in the EAA. Regarding CEO's proposed decision option to cast a wide net of projects for consideration, CenterPoint Energy recommends denial of this proposal. Each proposed project that a utility completes is unique and different. With each project there is a range of differences; this variation for each project type is shown in diversity in the project scope, project drivers and project timeline for example. While the Company believes there should be various types of learnings in the EAA process, too broad a net adds unclear direction, noting variety is already captured in projects eligible in the Company's proposed cost threshold of \$15 million. To the extent that there doesn't appear to be diversity in projects selected for the EAA, the Company

noted in our May 31, 2024, Straw Proposal that CenterPoint Energy would consider a lower threshold and be prepared to have those conversations in the aforementioned stakeholder meetings to ensure project diversity.

Additionally, regarding CEO's proposed decision option to provide justification of why a project was not selected, the Company's agreement to this is dependent on the threshold ultimately set by the Commission. The Company continues to support the higher threshold of \$15 million to focus its efforts for alternatives analysis on a limited number of projects as we begin the process of filing the Company's first IRP. The Company will consider lowering the threshold to \$10 million if the number of projects eligible for the EAA is limited to five projects. The three gas utilities are all very unique, with differentiations in the size of the utility as well as the system itself. CenterPoint Energy continues to request the Commission consider utility-specific cost threshold levels. In further discussions with Parties, there is growing concern that a lower threshold will lead to significant analysis and review regarding not only the EAA for the two to three projects selected but also the explanation needed to justify why projects were not selected for the EAA eligible at the lower cost threshold. The Company has concerns that this additional work will convolute the intent of the IRP to help gas utilities adapt to increasing extreme weather events and cause secondary issues, such as project selection criteria, to become the focus of the IRP.

Finally, CenterPoint Energy recommends Commission denial of the proposed decision option regarding the minimum elements to be included in the EAA. There is no guarantee that all EAA projects selected would include such items as a non-pipeline alternative, and these additional requirements seem overly restrictive and could reduce the number of projects selected for the EAA.

Timeline

CUB and CEE recommend Xcel file the first IRP in late 2026, CenterPoint to follow in late 2027, and finally MERC in late 2028. Additionally, the DOC recommends the same order of IRP filings as CUB and CEE but states the filing date of the IRP should be October 1 of each year.

CenterPoint Energy is supportive of order of IRP filings and also supports a filing due date of October 1.

Equity

CUB supports CenterPoint Energy's discussion to evaluate ways to incorporate public data and mapping tools for low-income residents or disadvantaged communities in the IRP process, and CEO proposes the following decision option to integrate mapping into the alternative analysis criteria:

To integrate equity into alternatives analyses, utilities shall evaluate ways to overlay maps of proposed capital projects and resource acquisitions across maps of environmental justice and disadvantaged communities in the utilities' service areas.

Additionally, BDC proposes the following decision option regarding equity discussions within the Utilities' IRP filings:

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Would the project be completed full or in part within an Environmental Justice Area as defined by state statute [Minn. Stat. § 116.065, subd. 1\(e\) \(2023\)](#)

Finally, CEE recommends the Great Plains Institute incorporate an equity-focused component to the Gas Utility Innovation Roundtables to inform the development of natural gas IRPs.

CenterPoint Energy is appreciative of CUB's comments, and also support CEO's and BDC's proposed decision options as well as CEE's recommendation.

Conclusion

Finally, CEE does recommend the Commission require the Utilities to work closely with stakeholders in the development of the IRPs. Generally speaking, CenterPoint Energy is in agreement with this proposal, but would like to see a defined approach to these meetings to ensure meaningful conversations.

Please feel free to contact me at 612-393-6216, seth.demerritt@centerpointenergy.com, or emily.suppes@centerpointenergy.com, 612-321-5363, with any questions.

Sincerely,

/s/ Seth DeMerritt

Manager, Regulatory and Rates

/s/ Emily Suppes

Director, Regulatory Affairs

C: Service Lists

CERTIFICATE OF SERVICE

On Friday, July 19, 2024, Melodee Carlson Chang certifies that she served the attached Reply Comments of CenterPoint Energy in Docket Nos. G008,G002,G011/CI-23-117 and G999/CI-21-565 to all persons at the addresses indicated on the attached service lists by having the document delivered via electronic filing, or if indicated, via U.S. Mail.

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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
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_23-117_Official List
Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce	401 N Robert Street Suite 150 St Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
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
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_23-117_Official List
Robert	Lems	administration@dm-cgs.com	DMT Clear Gas Solutions	19125 SW 125th Ct Tualatin, OR 97062	Electronic Service	No	OFF_SL_23-117_Official 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_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_23-117_Official List
Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_23-117_Official List
Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_23-117_Official 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_23-117_Official List
Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute	N/A	Electronic Service	No	OFF_SL_23-117_Official List
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-117_Official 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_23-117_Official List
Taylor	McNair	taylor@gridlab.org		668 Capp Street San Francisco, CA 94110	Electronic Service	No	OFF_SL_23-117_Official List
Sarah	Mead	sarah.mead@wecenergygroup.com	MERC	N/A	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
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_23-117_Official 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_23-117_Official List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_23-117_Official List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official 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_23-117_Official List
Alan	Muller	alan@greendel.org	Energy & Environmental Consulting	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_23-117_Official List
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
M. William	O'Brien	bobrien@mojaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Ric	O'Connell	ric@gridlab.org	GridLab	2120 University Ave Berkeley, CA 94704	Electronic Service	No	OFF_SL_23-117_Official List
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_23-117_Official List
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
Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC	3330 Washington Blvd Ste 400 Arlington, VA 22201	Electronic Service	No	OFF_SL_23-117_Official 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_23-117_Official List
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-117_Official List
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_23-117_Official List
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
Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, MN 55117	Electronic Service	No	OFF_SL_23-117_Official 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_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
Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth	500 East Grant Street 1207 #1207 Minneapolis, MN 55404	Electronic Service	No	OFF_SL_23-117_Official List
Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications	2378 Wilshire Blvd. Mound, MN 55364	Electronic Service	No	OFF_SL_23-117_Official List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_23-117_Official List
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	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
Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center	8421 Wayzata Blvd Ste 300 Golden Valley, MN 55426	Electronic Service	No	OFF_SL_23-117_Official List
Patrick	Serfass	pserrfass@ttcorp.com	American Biogas Council	1211 Connecticut Ave NW Ste 650 Washington, DC 20036	Electronic Service	No	OFF_SL_23-117_Official List
Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council	1211 Connecticut Ave NW Ste 650 Washington, DC 20036	Electronic Service	No	OFF_SL_23-117_Official List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-117_Official List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_23-117_Official List
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_23-117_Official List
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_23-117_Official List
Edyta	Sitko	esitko@ucsusa.org	Union of Concerned Scientists	1 N Lasalle Ave CHICAGO, IL 60602	Electronic Service	No	OFF_SL_23-117_Official List
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	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
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, CA 94105	Electronic Service	No	OFF_SL_23-117_Official List
Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth	1961 Premier Dr Ste 100 Mankato, MN 56001	Electronic Service	No	OFF_SL_23-117_Official List
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Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_23-117_Official List
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Mark	Spurr	mspurrr@fvbenergy.com	International District Energy Association	222 South Ninth St., Suite 825 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
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
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_23-117_Official List
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	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
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Kent	Sulem	ksulem@mmua.org	MMUA	3131 Fernbrook Ln N Ste 200 Plymouth, MN 55447-5337	Electronic Service	No	OFF_SL_23-117_Official List
Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_23-117_Official List
Matthew	Tomich	tomich@energy-vision.org	Energy Vision	138 E 13th St New York, NY 10003	Electronic Service	No	OFF_SL_23-117_Official List
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_23-117_Official List
Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC	700 Universe Blvd Juno Beach, FL 33408	Electronic Service	No	OFF_SL_23-117_Official List
Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas	1017 L Street #513 Sacramento, CA 95814	Electronic Service	No	OFF_SL_23-117_Official 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_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group	605 Highway 169 N Ste 1200 Plymouth, MN 55441	Electronic Service	No	OFF_SL_23-117_Official 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_23-117_Official List
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
James	Worlobah	james.worlobah@state.mn.us	Public Utilities Commission	121 7th Place E, Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
Tim	Wulling	t.wulling@earthlink.net		1495 Raymond Ave. Saint Paul, MN 55108	Electronic Service	No	OFF_SL_23-117_Official List
Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts	700 K St NW Washington, DC 20001	Electronic Service	No	OFF_SL_23-117_Official List
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_23-117_Official List
Grant	Zimmerman	GZIMMERMAN@AMPAMERICAS.COM	Amp Americas	811 W Evergreen Ave Ste 201 Chicago, IL 60642	Electronic Service	No	OFF_SL_23-117_Official List
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	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
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_21-565_Official Service List
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_21-565_Official Service List
Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource	15669 WATERLOO CIR TRUCKEE, CA 96161	Electronic Service	No	OFF_SL_21-565_Official Service List
Gary	Ambach	Gambach@slipstreaminc.org	Slipstream, Inc.	8973 SW Village Loop Chanhassen, MN 55317	Electronic Service	No	OFF_SL_21-565_Official Service 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_21-565_Official Service List
Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato	P.O. Box 3368 Mankato, MN 560023368	Electronic Service	No	OFF_SL_21-565_Official Service List
Mara	Ascheman	mara.k.ascheman@xcenergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-565_Official Service List
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_21-565_Official Service List
Randall	Beck	RBeck3@wm.com	Waste Management Renewable Energy, L.L.C.	1021 Main St Houston, TX 77002	Electronic Service	No	OFF_SL_21-565_Official Service List
David	Bender	dbender@earthjustice.org	Earthjustice	1001 G Street NW Suite 1000 Washington, DC 20001	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
Alicia	Berger	Alicia.E.Berger@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-565_Official Service List
Tracy	Bertram	tbertram@ci.becker.mn.us		12060 Sherburne Ave Becker City Hall Becker, MN 55308-4694	Electronic Service	No	OFF_SL_21-565_Official Service List
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
Mike	Boughner	Michael.I.boughner@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-565_Official Service 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_21-565_Official Service List
Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.	180 South Clinton Avenue Rochester, NY 14646	Electronic Service	No	OFF_SL_21-565_Official Service List
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-565_Official Service List
Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy	10 2nd St NE Ste. 400 Minneapolis, MN 55413	Electronic Service	No	OFF_SL_21-565_Official Service List
Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
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_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_21-565_Official Service 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_21-565_Official Service List
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_21-565_Official Service List
Sheri	Comer	Sheri.comer@fr.com	Frontier Communications Corporation	1500 MacCorkle Ave SE Charleston, WV 25396	Electronic Service	No	OFF_SL_21-565_Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-565_Official Service List
Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350	729 6th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-565_Official Service List
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-565_Official Service List
Seth	DeMerritt	Seth.DeMerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-565_Official Service List
Tom	Dicklich	tdicklich@mnrades.org	Minnesota Building & Construction Trades Council	353 W. 7th St Rm 105 Saint Paul, MN 55102	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
J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Ste 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-565_Official Service List
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-565_Official Service List
John	Farrell	jfarrell@ilsr.org	Institute for Local Self- Reliance	2720 E. 22nd St Institute for Local Self- Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-565_Official Service List
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_21-565_Official Service List
Mike	Fiterman	mikefiterman@libertydiversi fied.com	Liberty Diversified International	5600 N Highway 169 Minneapolis, MN 55428-3096	Electronic Service	No	OFF_SL_21-565_Official Service List
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_21-565_Official Service List
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_21-565_Official Service List
BEAU	GRIFFEY	bgriffey@id8energy.com	iD8 Energy Group, LLC	1799 County Rd 90 N Maple Plain, MN 55395	Electronic Service	No	OFF_SL_21-565_Official Service List
Edward	Garvey	edward.garvey@AESLcons ulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_21-565_Official Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	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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Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-565_Official Service List
Laura	Haight	lhaight@pfpi.net	Partnership for Policy Integrity	POB 2513 Amherst, MA 01004	Electronic Service	No	OFF_SL_21-565_Official Service List
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-565_Official Service List
Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.	570 Colonial Park Drive Suite 305 Roswell, GA 30075-3770	Electronic Service	No	OFF_SL_21-565_Official Service List
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-565_Official Service List
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-565_Official Service List
Joylyn C	Hoffman Malueg	Joylyn.hoffmanmalueg@weceenergygroup.com	Minnesota Energy Resources	2685 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_21-565_Official Service List
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-565_Official Service List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	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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Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_21-565_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-565_Official Service List

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