

March 27, 2026

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. G-008/M-23-215

Dear Ms. Bergman,

Attached are the supplemental comments of the Minnesota Department of Commerce (Department) in the following matter:

In the Matter of CenterPoint's Natural Gas Innovation Plan.

The Petition was filed by CenterPoint Energy on January 22, 2026.

The Department **recommends that the Commission eliminate CenterPoint's NGIA Pilot D.** The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

Analyst(s) TW/MZ/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G-008/M-23-215

I. INTRODUCTION

On March 17, 2026, CenterPoint Energy (CenterPoint or the Company) filed reply comments in regard to its request for approval of budget modification for its Natural Gas Innovation Act (NGIA) Pilot D.¹ The Company requested to increase the Pilot D budget by \$1,404,384 and to transfer this amount from either the Pilot C budget (the Company’s preferred option) or the reserve funds for R&D pilots.² The total requested budget increase includes an initial increase of \$468,412 and a contingency increase of \$935,972.³ CenterPoint’s reply comments responded to the Department’s questions regarding how the Company determined the contingency portion of its requested budget increase.⁴ CenterPoint also addressed in its reply comments other parties’ comments on the contingency increase, concerns about the ongoing cost-effectiveness of Pilot D, ongoing concerns regarding the Pilot as a whole, and requests for additional information.

II. PROCEDURAL BACKGROUND

June 26, 2021	Governor Walz signed Minnesota’s Natural Gas Innovation Act into law establishing a regulatory framework for natural gas utilities to contribute to meeting Minnesota’s greenhouse gas reduction and renewable energy goals through the development of “innovation plans” using “innovative resources.” ⁵
June 28, 2023	CenterPoint filed its Natural Gas Innovation Plan. ⁶
March 15, 2024	CenterPoint filed reply comments describing modifications to its Natural Gas Innovation Plan in response to parties’ comments and various changes to circumstances. ⁷

¹ *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, CenterPoint Energy, Reply Comments, March 17, 2026, Docket No. G-008/M-23-215, (eDockets) [20263-229381-01](#) (hereinafter, “CenterPoint Reply Comments”).

² Request for Approval of Budget Modification and Compliance Filing, CenterPoint Energy, January 22, 2026, Docket No. G-008/M-23-215, (eDockets) [20261-227270-01](#) (hereinafter, “Petition”) at 5-6.

³ *Id.*, at 6.

⁴ CenterPoint Reply Comments at 11.

⁵ Minnesota Laws 2021, 1st Special Session, ch.4, art. 8, §§ 20-21, 27.

⁶ CenterPoint Energy, Petition, June 28, 2023, Docket No. G-008/M-23-215, (eDockets) [20236-196995-01](#).

⁷ Reply Comments, CenterPoint Energy, March 15, 2024, Docket No. G-008/M-23-215, (eDockets) [20243-204399-04](#) (hereinafter, “CenterPoint Modified NGIA Plan”).

October 9, 2024	The Public Utilities Commission (Commission) approved CenterPoint's Natural Gas Innovation Plan. as described in CenterPoint's March 15, 2024 reply comments, with modifications. ⁸
May 30, 2025	CenterPoint Energy filed its first NGIA annual status report for activities during calendar year 2024. ⁹
March 6, 2025	The Commission accepted CenterPoint's annual status report, approving the continuation of all pilots within CenterPoint's plan without modification and requiring CenterPoint to file a notification if the Pilot D timeline is delayed in a way that may jeopardize the receipt of expected federal tax credits. ¹⁰
January 22, 2026	CenterPoint filed its request for approval of budget modification and compliance filing. The requested budget modification included an increase of the Pilot D budget by \$1,404,384 and a proposal to move this amount from either the Pilot C budget or the R&D reserve funds. ¹¹
January 30, 2025	The Commission issued a notice of comment period. ¹²
March 3, 2026	The Department, Fresh Energy, the Citizens Utility Board of Minnesota (CUB), and the Office of the Attorney General, Residential Utilities Division (OAG-RUD) filed their initial comments. ^{13,14,15,16}
March 17, 2026	CenterPoint filed its reply comments. ¹⁷

Topic(s) open for comment:

- Should the Commission approve, modify, or deny CenterPoint's request to increase its 5-year budget for its hydrogen blending pilot by \$1,404,384?

⁸ *Order Approving Natural Gas Innovation Plan with Modifications*, October 9, 2024, Docket No. G-008/M-23-215, (eDockets) [202410-21085-01](#) (henceforth, "Order Approving NGIA Plan with Modifications").

⁹ CenterPoint Energy, Report, May 30, 2025, Docket No. G-008/M-23-215, (eDockets) [20255-219457-01](#).

¹⁰ *Order*, November 13, 2025, Docket No. G-008/M-23-215, (eDockets) [202511-224543-01](#).

¹¹ Petition.

¹² *Notice of Comment Period*, January 30, 2026, Docket No. G-008/M-23-215, (eDockets) [20261-227659-01](#).

¹³ Department, Comments, March 3, 2026, Docket No. G-008/M-23-215, (eDockets) [20263-228863-01](#) (hereinafter, "Department Initial Comments").

¹⁴ Fresh Energy, Comments, March 3, 2026, Docket No. G-008/M-23-215, (eDockets) [20263-228886-01](#).

¹⁵ CUB, Comments, March 3, 2026, Docket No. G-008/M-23-215, (eDockets) [20263-228883-01](#) (hereinafter, "CUB Initial Comments").

¹⁶ OAG-RUD, Comments, March 3, 2026, Docket No. G-008/M-23-215, (eDockets) [20263-228876-01](#).

¹⁷ CenterPoint Reply Comments.

- If the Commission approves CenterPoint's request to increase the pilot's 5-year budget, should the Commission order CenterPoint to use excess funds from Pilot C, R&D Reserve Funds, or another source to cover this increase?
- Is CenterPoint's updated 5-year budget for this pilot project reasonable?
- Are there any other issues or concerns related to this matter?

Below are the supplemental comments of the Department regarding the Petition.

III. DEPARTMENT ANALYSIS

A. FEED STUDY 25% RANGE

A.1. Department Request

CenterPoint derived the contingency portion of its budget increase request from an assumed 25 percent accuracy range included in its front-end engineering design (FEED) study for Pilot D.¹⁸ In other words, the full budget increase request, including the contingency, assumes capital costs 25 percent higher than estimated by the FEED study. In its initial comments, the Department requested that CenterPoint explain how the FEED study selected 25 percent for the accuracy range.¹⁹

A.2. CenterPoint's Reply

In its reply comments, CenterPoint explained that preliminary engineering estimates typically assume a 15 to 25 percent accuracy range.²⁰ Standby Systems, which completed the FEED study for CenterPoint, conservatively chose 25 percent given the developing state of the green hydrogen industry.²¹

CenterPoint also noted that, if the Commission were to approve CenterPoint's full budget increase request, the contingency budget increase and full budget increase would make up 15.4 percent and 23.2 percent of Pilot D's updated five-year plan budget, respectively.²² The Company noted that the Commission, in comparison, previously approved a 26.3 percent contingency budget for Xcel's electrolyzer pilot.

A.3. Department Analysis

The Department recognizes that, if the Commission were to approve CenterPoint's full budget increase request, then the contingency amount would comprise a relatively small portion of the total updated Pilot D budget compared to the contingency budget that the Commission approved for a comparable Xcel pilot. However, the Department remains concerned about the magnitude of the contingency portion, particularly given that CenterPoint did not request a contingency budget for Pilot D in its initial

¹⁸ Petition at 6.

¹⁹ Department Initial Comments at 5.

²⁰ CenterPoint Reply Comments at 11.

²¹ *Ibid.*

²² *Ibid.*

NGIA plan. CenterPoint did not indicate in its reply comments that the 25 percent uncertainty range in the FEED study was chosen based on new uncertainties that were not present at the time of the Company's initial cost estimate. Therefore, the Department is concerned that the Company's initial Pilot D budget, which the Commission approved in its October 9, 2024 Order,²³ did not properly reflect the pilot's level of cost uncertainty.

B. IMPACT OF INCREASED CAPITAL COSTS ON ANTICIPATED ITC BENEFIT

B.1. Department Request

In its initial comments, the Department noted that CenterPoint assumed Pilot D's anticipated investment tax credit (ITC) benefits would not be impacted by the increased capital costs in the contingency budget increase request.²⁴ This assumption resulted in a 28 percent contingency increase in revenue requirements for capital projects, despite only a 25 percent increase in capital costs.

B.2. CenterPoint's Reply

In its reply comments, CenterPoint explained that Pilot D's ITC benefit depends on the solar components of the project, not the project's overall capital costs.²⁵ Since the solar industry is relatively well established and therefore solar capital costs are relatively certain, the Company assumed that the 25 percent accuracy range in the FEED study was attributed to hydrogen-related components. These components would not be eligible for additional ITCs.²⁶

B.3. Department Analysis

The Department appreciates CenterPoint's explanation for its assumption of unchanged ITC amounts in the initial and contingency budgets. The Department agrees that CenterPoint can expect the contingency portion of the budget to address hydrogen-related components of the project, and not solar components. The Department does not have any further concerns in this matter.

C. CONTINUATION OF PILOT D

In its initial comments, CUB recommended that the Commission eliminate Pilot D rather than approving CenterPoint's budget increase request.²⁷ This recommendation aligns with the Department's recommendation to reject Pilot D in its January 16, 2024 comments.²⁸ Since the Commission approved the pilot, the Department chose not to readdress concerns with the pilot in its initial comments and instead focused only on the budget increase request.²⁹ However, at this time the Department revisits its concerns given the analysis provided by other parties and the Company's responses.

²³ Order Approving NGIA Plan with Modifications, at 33.

²⁴ Department Initial Comments at 6.

²⁵ CenterPoint Reply Comments at 11.

²⁶ *Ibid.*

²⁷ CUB Initial Comments at 4.

²⁸ Department, Comments, January 16, 2024, Docket No. G-008/M-23-215, (eDockets) [20241-202261-02](#) (hereinafter "NGIA Comments").

²⁹ Department Initial Comments at 3.

For example, in CenterPoint’s budget increase request, the company cited the need for a higher-cost custom-built electrolyzer, instead of the packaged unit assumed in its original cost estimate, as a reason for higher estimated costs.³⁰ The Company explained that available packaged units would fail to meet cold-weather conditions at the Pilot site. CUB noted in its initial comments that CenterPoint could have used its experience with its existing Minneapolis Green Hydrogen unit to avoid this misstep in its original cost estimate.³¹ CenterPoint explained in its reply comments that packaged systems were not designed to withstand colder climates at the time of the original cost estimate, but that, based on conversations with manufacturers, the Company expected suitable packaged solutions to become available by the start of the pilot’s development.³² CenterPoint emphasized that manufacturers were only willing to provide high-level cost estimates and maintained key technical information as proprietary when Standby was conducting its original cost estimate.³³ Given the uncertainties around cold-weather performance of packaged units and the lack of complete information from manufacturers, the Department questions why CenterPoint did not include contingency funds in its initial cost estimate. As noted in Section A.3 and further supported by the discussion on packaged systems, the Department concludes that the Commission made its decision to accept Pilot D based on incomplete information about the pilot’s cost uncertainties.

In the Department’s January 16, 2024 comments, it noted that proposed pilot was estimated to cost \$66/Dth, or around triple the cost of the proposed renewable natural gas projects (RNG), which by themselves are already far more expensive per DTH than geologic gas.³⁴ The increases in costs for Pilot D, and the introduction of a contingency portion due to cost uncertainties, exacerbates the already low cost effectiveness of this pilot without a clear picture of what additional learnings the Company would obtain that CenterPoint is not already able to obtain from its existing hydrogen facility. CenterPoint’s updated cost-effectiveness analysis,³⁵ which indicates that the pilot would cost \$974 to \$1,088 per metric ton of CO₂e reduced,³⁶ further underscores the Department’s concern.

For these reasons **the Department recommends that the Commission eliminate Pilot D rather than increase the budget to accommodate the increase in cost.**

D. CENTERPOINT’S BUDGET INCREASE REQUEST

In this section the Department discusses its recommendations in the event that the Commission does not eliminate Pilot D.

³⁰ Petition at 3-4.

³¹ CUB Initial Comments at 4.

³² CenterPoint Reply Comments at 10.

³³ CenterPoint Reply Comments at 6.

³⁴ NGIA Comments at 40-41.

³⁵ CenterPoint Reply Comments at 13.

³⁶ These costs incorporate the FEED study capital cost estimate and the FEED study capital cost estimate + 25% (i.e., the initial and full budget increase requests) with tax credit assumptions consistent with the Petition. CenterPoint also provided estimates using the lower bound of the FEED study uncertainty range (capital cost estimate -25%) and with alternative tax credit assumptions.

In its initial comments, the Department recommended that the Commission approve CenterPoint's initial budget increase request (not including the contingency portion) but did not make a recommendation on whether to approve the Company's full budget increase request.³⁷ The Department notes that, if the Commission were to only approve the Company's initial budget increase request, the Company could file an additional request in the future should it need to further increase the Pilot D budget. Therefore, based on the factors discussed above, **the Department recommends that if the Commission does not eliminate Pilot D, it approve only CenterPoint's initial budget increase request and require the Company to file an additional budget increase request should Pilot D's capital costs increase above the baseline costs estimated by the FEED study.**

Further, **the Department recommends that if the Commission does not eliminate Pilot D and the Commission approves the full budget increase request, it require CenterPoint to report on any use of the contingency portion of the budget and to provide evidence of cost increases beyond the Company's control. As noted by CenterPoint in its reply comments, this reporting could be incorporated into the Company's annual NGIA status reports.**³⁸

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the Petition and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

C. CONTINUATION OF PILOT D

- C.1. The Department recommends that the Commission eliminate Pilot D rather than increase the budget to accommodate the increase in cost.

D. CENTERPOINT'S BUDGET INCREASE REQUEST

- D.1. The Department recommends that if the Commission does not eliminate Pilot D, it approve only CenterPoint's initial budget increase request and require the Company to file an additional budget increase request should Pilot D's capital costs increase above the baseline costs estimated by the FEED study.
- D.2 The Department recommends that if the Commission does not eliminate Pilot D and the Commission approves the full budget increase request, it require CenterPoint to report on any use of the contingency portion of the budget and to provide evidence of cost increases beyond the Company's control. As noted by CenterPoint in its reply comments, this reporting could be incorporated into the Company's annual NGIA status reports.

³⁷ Department Initial Comments at 5.

³⁸ CenterPoint Reply Comments at 5.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of people by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Supplemental Comments**

Docket No. G008/M-23-215

Dated this **27th** day of **March 2026**

/s/Sharon Ferguson

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73	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official
74	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	23-215Official
75	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
76	Betsy	Lang	betsy.lang@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Ave Mall, 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
77	Samuel	Lehr	sam.lehr@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L St #513 Sacramento CA, 95814 United States	Electronic Service		No	23-215Official
78	Robert	Lems	administration@dmr-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	23-215Official
79	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-215Official
80	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	23-215Official
81	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-215Official
82	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	23-215Official
83	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
84	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-215Official
85	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
86	Emily	Marshall	emarshall@ourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
87	Nicholas	Martin	nicholas.f.martin@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th floor Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
88	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	23-215Official
89	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
90	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	23-215Official
91	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-215Official
92	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	23-215Official
93	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	23-215Official
94	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	23-215Official
95	Ana Sophia	Mifsud	amifsud@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-215Official
96	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
97	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	23-215Official
98	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-215Official
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	23-215Official
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	23-215Official
101	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351	Electronic Service		No	23-215Official

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						Cedar Rapids IA, 52406-0351 United States				
102	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	23-215Official
103	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-215Official
104	Logan	O'Grady	logrady@mNSEIA.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	23-215Official
105	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-215Official
106	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official
107	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	23-215Official
108	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	23-215Official
109	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	23-215Official
110	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
111	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	23-215Official
112	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-215Official
113	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	23-215Official
114	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul MN, 55102 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
115	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	23-215Official
116	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	23-215Official
117	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-215Official
118	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	23-215Official
119	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	23-215Official
120	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
121	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	23-215Official
122	Rebecca	Schultz	rebecca.schultz@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
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	23-215Official
124	Patrick	Serfass	policy@americanbiogascouncil.org	American Biogas Council		1126 I Street SE Washington DC, 20003 United States	Electronic Service		No	23-215Official
125	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	23-215Official
126	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	23-215Official
127	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	23-215Official
128	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						4018 United States				
129	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-215Official
130	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-215Official
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	23-215Official
132	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-215Official
133	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-215Official
134	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
135	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
136	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
137	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	23-215Official
138	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
139	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	23-215Official
140	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
141	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	23-215Official
142	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-215Official
143	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable		1017 L Street #513	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Natural Gas		Sacramento CA, 95814 United States				
144	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- 215Official
145	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	23- 215Official
146	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- 215Official
147	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23- 215Official
148	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23- 215Official
149	Donald	Wynia	donald.wynia@centerpointenergy.com	CenterPoint Energy		CenterPoint Energy 505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23- 215Official
150	Grant	Zimmerman	gzimmerman@ampamericas.com	Amp Americas		811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States	Electronic Service		No	23- 215Official
151	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23- 215Official
152	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 215Official