



Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
www.minnesotaenergyresources.com

March 31, 2025

VIA ELECTRONIC FILING

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

Re: In the Matter of Recent Utility Cold Weather Rule Reports
Docket No. E,G-999/PR-25-02

Reply Comments of Minnesota Energy Resources Corporation

Dear Mr. Seuffert:

On February 28, 2025, the Minnesota Public Utilities Commission ("Commission") issued a Notice of Comment Period on Cold Weather Rule Reports for Regulated Gas and Electric Companies (the "Notice") in the above-referenced docket. The Notice requested comments on the following two general issues:

1. Should the Commission take any action on the residential customer status data reported in Docket No. E, G-999/PR-25-2, including service disconnections, payment arrangements, and various customer protections and assistance?
2. Should utilities be required to develop disconnection and payment arrangement policies and make them public? Once the policies are developed, should there be any other modifications made to them?

The Notice also listed topics for the gas and electric utilities to respond to:

- Per Appendix A, Request #1, would your utility submit a compliance filing in the instant docket detailing its current policies and practices on disconnections, service deposits, and payment agreements? ¹

¹ Appendix A, Request #1 of the February 28, 2025 Notice reads as follows: Require regulated utilities to submit a compliance filing in the instant docket detailing their current policies and practices on disconnections, service deposits, and payment agreements. Require regulated utilities to submit additional filings in Docket No. E,G-999/PR-YR-02 whenever there are changes to their disconnection, service deposit, and payment agreement

- Per Appendix A, Request #2, would your utility display its disconnection, service deposit, and payment agreement policies and practices on your website, and explain those procedures in clear, easy-to-understand language? ²
- Per Appendix A, Request #3, would your utility post the mock language from CUB and LSAP on its website? ³
- As Citizens Utility Board of Minnesota (“CUB”) and the Legal Services Advocacy Project (“LSAP”) have only recommended the actions listed in Appendix A⁴, and these actions have not been Ordered by the Commission, if your utility would not voluntarily comply with the Requests 1-3, please discuss why doing so is unfeasible or inappropriate.

Lastly, the Notice listed topics for comment based on questions the Commission regularly poses in Docket No. E,G-999/PR-YY-02 and interactions with the Commission’s Consumer Affairs Office (“CAO”):

- How do utilities currently communicate information on disconnection and payment arrangement policies to non-English language speakers, especially to people that do not read their native language?
- Considering Staff’s information request (“IR”) for Xcel filed on December 20, 2024 in Docket No. E, G-999/PR-24-22 and Xcel’s IR responses on February 7, 2025, are the utilities following the Cold Weather Rule (“CWR”) appeal process in Minn. Stat. 216B.096, Subd. 8?
- Are utilities’ heat-affected customers, particularly for customers with electricity service necessary to operate gas heating equipment, being provided with appropriate protections during CWR season (October 1-April 30), including site

policies and practices. For those companies requiring down payments or service deposits, these reports must include an explanation of how those amounts are determined.

² Appendix A, Request #2 of the February 28, 2025 Notice reads as follows: Require regulated utilities to display their disconnection, service deposit, and payment agreement policies and practices on their respective websites, and explain those procedures in clear, easy-to-understand language.

³ Appendix A, Request #3 of the February 28, 2025 Notice reads as follow: Require regulated utilities to post the following language on their respective websites in a conspicuous place:

- a. Under Minnesota law, [UTILITY NAME] customers are entitled to a payment agreement for the payment of overdue bills. This payment agreement must consider a customer’s financial circumstances and any extenuating circumstances of the household.
- b. If the payment agreement terms offered are not affordable to you, or if your household is facing financial or extenuating circumstances, you should contact a(n) [UTILITY NAME] customer account representative at [PHONE NUMBER and/or EMAIL ADDRESS].
- c. If you are unable to reach a mutually agreeable arrangement with a customer account representative, you may appeal the decision with the Minnesota Public Utilities Commission’s Consumer Affairs Office. The Consumer Affairs Office can be contacted at 651-296-0406 or 800-657-3782, or by email at consumer.puc@state.mn.us.

⁴ Comments filed jointly by CUB and LSAP in Docket No. E,G-999/PR-24-2 on January 31, 2025.

visits before any disconnections for non-payment? How are utilities ensuring that its records of heat-affected customers are accurate?

Minnesota Energy Resources Corporation (“MERC” or “Company”) submits these Comments in response to the above issues and topics in the Commission’s February 28, 2025 Notice.

Appendix A, Request #1; submit a compliance filing in the instant docket detailing its current policies and practices on disconnections, service deposits, and payment agreements

CUB and LSAP filed comments on January 31, 2025 in Docket No. E,G-999/PR-24-2. Commission Staff reproduced CUB and LSAP’s recommendations from those January 31, 2025 comments as Appendix A in the Notice.

CUB and LSAP’s request at Appendix A, Request #1 of the Notice reads as follows:

Require regulated utilities to submit a compliance filing in the instant docket detailing their current policies and practices on disconnections, service deposits, and payment agreements. Require regulated utilities to submit additional filings in Docket No. E,G-999/PR-YR-02 whenever there are changes to their disconnection, service deposit, and payment agreement policies and practices. For those companies requiring down payments or service deposits, these reports must include an explanation of how those amounts are determined.

MERC does not believe it is necessary to submit a compliance filing detailing current policies and practices on disconnections, service deposits and payment agreements, as MERC’s Commission-approved tariffs already contain the requested information:

- Tariff Sheet Nos. 8.22 through 8.34: policies and practices on disconnections
- Tariff Sheet Nos. 8.20, 8.21e, and 8.29 through 8.31: policies and practices on payment agreements
- Tariff Sheet No. 8.15: policies and practices for service deposits.

These Commission-approved tariffs follow Minnesota Statute and Administrative Rules. To require the Company to prepare and submit an additional filing to the Commission would be inefficient when this information has already been approved by the Commission and is readily available to all parties, including CUB and LSAP.

Additionally, a filing to the Commission is required any time the Company proposes a change to their Commission-approved tariffs. Therefore MERC does not believe it is necessary for the Commission to implement CUB and LSAP’s request that regulated utilities submit additional filings whenever there are changes made to policies and practices on disconnections, payment agreements and services deposits.

Lastly, CUB and LSAP's request at Appendix A, Request #1 states for those companies requiring down payments or service deposits, these reports must include an explanation of how those amounts are determined. MERC's Commission-approved Tariff Sheet No. 8.15 explains how service deposits amounts are determined. In regard to down payment amounts, that explanation is as follows:

- During non-CWR months:
 - For non-low income customers, the Company initially requests a down payment equal to 40% of the arrears balance, with a payment plan time period of up to 18 months on the remaining account balance. If customers have extenuating circumstances, these terms can be adjusted.
 - For low-income customers, the Company initially offers the option of applying for the Company's Gas Affordability Program ("GAP").
- During CWR months:
 - For non-low income customers, the Company does not request a down payment, and monthly installments are determined based on the customer's arrears balance divided by number of months remaining for the CWR time period.
 - For low-income customers, the Company does not request a down payment, and the terms of the payment plan are determined based on income level. Monthly installments will not exceed 10% of their monthly income.
 - All CWR payment arrangements, whether a low income or non-low income customer, can be subject to additional considerations on a case-by-case basis depending on customer circumstances.
 - While the Company does not request a down payment from either low income or non-low income customers, if customers choose to do so, they are allowed to make a down payment that is within their financial means.

Appendix A, Request #2; display disconnection, service deposit, and payment agreement policies and practices on the utility's website in clear, easy-to-understand language

CUB and LSAP's request at Appendix A, Request #2 of the Notice reads as follows:

Require regulated utilities to display their disconnection, service deposit, and payment policies and practices on their respective websites, and explain those in procedures in clear, easy-to-understand language.

MERC provides its Commission-approved tariffs on its website⁵, and therefore already displays its policies and practices for disconnections, service deposits and payment policies.

Further, MERC has multiple web pages that provide the policies and procedures in clear, easy-to-understand language. Information regarding MERC's flexible payment plan options can be found at <https://www.minnesotaenergyresources.com/payment-bill/assistance>. This webpage provides customers with multiple options to set up a payment arrangement and/or contact the Company, along with providing to customers links to various energy assistance options.

Additional information on payment arrangements can be found by customers at <https://www.minnesotaenergyresources.com/payment-bill/arrangements>. Lastly, customers are provided the flexibility to tailor their payment arrangements through the Company's website when logging into their account. Below is a screenshot of the optionality that customers can see when tailoring their payment arrangements via the Company's website.

The screenshot displays the Minnesota Energy Resources website interface. At the top, there is a navigation bar with the company logo and links for "Payment & Billing", "Services & Programs", "Ways to Save", and "Safety". Below the navigation bar, a blue-bordered box contains a notice: "Eligible Minnesota customers are protected from natural gas disconnection. Review [Minnesota Cold Weather Rule](#) details to see if you qualify." Below this notice is a progress bar with three steps: "Terms" (highlighted with an orange circle), "Verify and submit", and "Confirmation". The main content area lists account details: "Account balance" (\$619.30), "Down payment" (\$248.00), "Down payment due" (3/22/2025), and "Remaining balance" (\$371.30). Under "Payment plan", there are three radio button options: "\$30.95/mo - 12 payments" (selected), "\$24.76/mo - 15 payments", and "\$20.63/mo - 18 payments" (marked as "BEST OFFER"). A link "Create custom payment plan" is also present. A disclaimer states: "You are required to pay your bill's amount due each month, which will include your new bill charges in addition to your payment arrangement installment for the remaining balance." At the bottom, there are two buttons: "Continue to step 2" and "Cancel".

MINNESOTA ENERGY RESOURCES

Payment & Billing Services & Programs Ways to Save Safety

Eligible Minnesota customers are protected from natural gas disconnection. Review [Minnesota Cold Weather Rule](#) details to see if you qualify.

Terms Verify and submit Confirmation

Account balance
\$619.30
Down payment
\$248.00
Down payment due
3/22/2025
Remaining balance
\$371.30
Payment plan
☒ \$30.95/mo - 12 payments
☐ \$24.76/mo - 15 payments
☐ \$20.63/mo - 18 payments **BEST OFFER**
[Create custom payment plan](#)

You are required to pay your bill's amount due each month, which will include your new bill charges in addition to your payment arrangement installment for the remaining balance.

Continue to step 2 Cancel

⁵ <https://www.minnesotaenergyresources.com/company/tariffs>

Appendix A, Request #3; post the mock language from CUB and LSAP on the utility's website

CUB and LSAP's request at Appendix A, Request #3 of the Notice reads as follows:

Require regulated utilities to post the following language on their respective websites in a conspicuous place:

- a. Under Minnesota law, [UTILITY NAME] customers are entitled to a payment agreement for the payment of overdue bills. This payment agreement must consider a customer's financial circumstances and any extenuating circumstances of the household.
- b. If the payment agreement terms offered are not affordable to you, or if your household is facing financial or extenuating circumstances, you should contact a(n) [UTILITY NAME] customer account representative at [PHONE NUMBER and/or EMAIL ADDRESS].
- c. If you are unable to reach a mutually agreeable arrangement with a customer account representative, you may appeal the decision with the Minnesota Public Utilities Commission's Consumer Affairs Office. The Consumer Affairs Office can be contacted at 651-296-0406 or 800-657-3782, or by email at consumer.puc@state.mn.us.

In general, MERC provides the information above via the Company's website and/or annual mailings. That being said, the Company can post the exact language detailed by CUB and LSAP on our website in a conspicuous place.

Current practices to communicate information on disconnection and payment arrangement policies to non-English language speakers, especially to people that do not read their native language

Based upon U.S. Census Bureau statistics, MERC determined that English and Spanish translations together would reach over 90% of Minnesota customers.⁶ MERC's website containing information on payment arrangements⁷ provides a hyperlink button that allows customers to view the website in Spanish. Additionally, Google Chrome has the

⁶ Docket No. E,G-999/CI-20-375, *In the Matter of an Inquiry into Actions by Electric and Natural Gas Utilities in Light of the COVID-19 Pandemic Emergency*; Compliance Filing of Minnesota Energy Resources Corporation, filed October 15, 2020, at pages 2-4. Based upon U.S. Census Bureau statistics, only 2.9% of the residents of Minnesota over the age of 17 speaks Spanish. These statistics do not segregate Spanish-only speaking residents from bilingual English-Spanish residents, so it is possible that much less than the total 2.9% do not speak English at all.

⁷ <https://www.minnesotaenergyresources.com/payment-bill/arrangements>

capability to translate any web page; as of March 2025, this feature supports translation of 240 unique languages and dialects.

Additionally, MERC has bilingual Care Center Agents available to assist non-English language speakers, and the Care Center also utilizes the Language Line Service, which provides translation services. Language Line Service is available 24 hours daily and provides translation for over 140 languages.

Are the utilities following the CWR appeal process in Minn. Stat. 216B.096, Subd. 8?

MERC's Care Center Agents are trained to ensure the CWR appeal process in Minn. Stat. §216B.096, Subd. 8 is followed. The process taken by Care Center Agents in regard to the appeals process is included in Attachment B and Attachment C to these comments. As reiterated in these comments, the Company continues to be flexible in payment arrangement options; this is confirmed by a historically low amount of customers utilizing the CWR appeals process. The number of customers that have requested appeals can be viewed in the Company's Residential Customer Status Reports filed in Docket No. E,G-999/PR-YY-02.

Are utilities' heat-affected customers being provided with appropriate protections during CWR season, including site visits before any disconnections for non-payment? How are utilities ensuring that its records of heat-affected customers are accurate?

As shown in the information provided in Attachment B, MERC's heat-affected customers are being provided the appropriate protections during CWR season. Additionally, MERC conducts site visits and leaves door tags twice before disconnection to give customers the opportunity to enroll in a CWR payment arrangement.

Additionally, MERC conducts outreach to residential customers via a bill insert two times a year reminding customers of the CWR, the protections it affords, and encouraging them to participate. Also, in accordance with Minn. Stat. §216B.096, each year between August 15 and October 15, MERC provides all residential customers, personally or by first class mail, or electronically for those requesting electronic billing, a summary of rights and responsibilities. Such summary of rights and responsibilities is also provided to all new customers with MERC's customer welcome packet.

Designation of heating is assigned to a premise location when the meter for the premise is initially set. Therefore, if a customer moves into a premise designated as heating, the customer is considered a heating customer. Additionally, if an existing customer moves out of a premise designated as heating and a new customer moves in, the new customer would be considered a heating customer because the designation of heating

remains associated with the premise location. MERC does not have any reason to believe that its current designation of premise locations as heating are inaccurate, and a change of a premise location from heating to non-heating would be a significant and noteworthy event. For example, a change in a premise designated as heating to non-heating would require a customer to change their existing natural gas heating service to an alternative fuel source, such as electric, propane or wood heating, which would require significant modifications to the premise as well as a natural gas service shut-off request. Alternatively, a change in a premise designated as non-heating to heating would require installation of a natural gas furnace system along with notifying MERC that gas service needs to be installed. A change to the heating designation of a premise location is only made when it is brought to the Company's attention.

CUB and LSAP request at Appendix A, Request #4

CUB and LSAP's request at Appendix A, Request #4 of the Notice reads as follows:

Require regulated utilities to detail in their next annual safety, reliability and service quality reports the average down-payment amount received from customers – both as a percentage of arrears and as a total dollar value – during CWR and non-CWR months. Regulated utilities must also explain how they have implemented the statutorily required consideration of both financial and extenuating circumstances for payment agreements during CWR and non-CWR months.

In the Notice, Commission Staff stated it was their intent to address CUB and LSAP Appendix A, Request #4 in the utilities' respective Annual Service Quality reports. MERC respectfully disagrees with Commission Staff, CUB and LSAP, and believes that this information should be filed within Docket No. E,G-999/PR-YY-02, and not filed or addressed within the respective Annual Service Quality reports.

The data requested by CUB and LSAP in Appendix A, Request #4 is already provided by utilities on Tab 5 of the Residential Customer Status Report. Currently, Tab 5 allows utilities to state whether a down payment is required to restore service, and if yes, utilities are to provide the down payment amount, *either as a percent of the past due balance or the average amount*. MERC currently provides the average down payment amount as a percentage of arrears.

The data requested by CUB and LSAP in Appendix A, Request #4, is seeking *both* the average down payment amount and the average down payment amount as a percentage of arrears. MERC believes that it would be most efficient and remain aligned with the intent of data provided in Docket E,G-999/PR-YY-02 to modify Tab 5 the Residential Customer Status Report to include both pieces of data requested by CUB and LSAP. MERC has provided a mock-up to Tab 5 of the Monthly Residential Customer Status Report template in Attachment A with changes highlighted in yellow

demonstrating how this data could potentially be incorporated into monthly data reporting. The proposed addition of this data to the Residential Customer Status Report aligns with other monthly information that is already being provided by utilities on payment arrangements, service deposits, reconnection fees, and down payments.

Regarding CUB and LSAP's request that utilities explain how they have implemented the statutorily required consideration of both financial and extenuating circumstances for payment agreements during CWR and non-CWR months, MERC provides the following explanation. MERC's Care Center Agents are trained to ensure consideration of both financial and extenuating circumstances for payment agreements during CWR and non-CWR months. The flexibility to consider household financial circumstances is demonstrated in the process, script, and calculator options that Care Center Agents utilize when discussing payment plans with customers. The process, script and calculator options are included in Attachment B to these comments. The flexibility to consider extenuating circumstances is demonstrated by the fact that during 2024, MERC averaged a 34.75% down payment amount during non-CWR months, and averaged a 23.98% down payment amount during CWR months, when it is the Company's standard practice to initially request a down payment equal to 40% of the arrears balance.⁸

CUB and LSAP request at Appendix A, Request #5

CUB and LSAP's request at Appendix A, Request #5 of the Notice reads as follows:

Require regulated utilities to provide a discussion in their next safety, reliability and service quality reports about how they manage disconnections due to a landlord's failure to pay, consistent with the requirements of Minn. R. 7820.1400.

In the Notice, Commission Staff stated it was their intent to address CUB and LSAP Appendix A, Request #5 in the utilities' respective Annual Service Quality reports. MERC agrees with Commission Staff that this issue should be addressed in the Annual Service Quality report.

CUB and LSAP request at Appendix A, Request #6

CUB and LSAP's request at Appendix A, Request #6 of the Notice reads as follows:

Require regulated utilities to include in their next annual affordability program reports a description of their current outreach activities to low-income customers about free and low-cost ECO programs. Require

⁸ Based on MERC Residential Customer Status Report for December 2024, filed in Docket No. E,G-999/PR-24-02. See Tab 5, Down Payment Amount as a Percent of Past Due Balance.

utilities to propose methods for improving ECO outreach to affordability program participants.

In the Notice, Commission Staff stated it was their intent to address CUB and LSAP Appendix A, Request #6 in the utilities' respective Annual Affordability Program reports. MERC respectfully disagrees with Commission Staff, CUB and LSAP, and does not believe that this information should be required to be filed in the utilities' respective Annual Affordability Program reports, as it would be duplicative of information already filed by the Company in its Annual Status Reports on Energy Conservation and Optimization ("ECO").

MERC remains committed to providing low-income customers with programs and services to make their homes energy efficient. Low-income program offerings include no-cost services and energy efficiency measures, or increased rebates or enhanced program offerings. Outreach to the low-income community includes our implementation partners, coordination with Community Action Program ("CAP") agencies, partnership with other organizations that target and serve the low-income community, service providers, local governments, and other utilities. Further details on MERC's ECO programs can be found in the 2024-2026 Triennial ECO Plan and Status Reports in Docket No. G011/CIP-23-98.

Lastly, a program requirement of MERC's GAP is that customers must have been qualified for and received assistance from the Low Income Home Energy Assistance Program ("LIHEAP"). Therefore the low-income program offerings contained within MERC's ECO program are being offered and promoted to GAP participants.

Conclusion

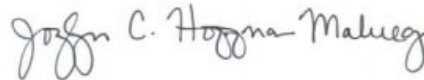
MERC believes that many of the recommendations made by CUB and LSAP in their January 31, 2025 comments are duplicative of information that utilities already file with the Commission, or is requesting information that is readily available on the Company's website. In summary, MERC takes the following positions on CUB and LSAP's recommendations:

- Appendix A, Request #1: The requested information is already detailed within MERC's Commission-approved tariffs, and already require a filing to the Commission by the Company in the event of proposed changes. Therefore the new compliance filing propose by CUB and LSAP would be duplicative and is not needed, and no action by the Commission is warranted.
- Appendix A, Request #2: MERC currently provides this information on its website in clear, easy-to-understand language, therefore no action by the Commission is required.
- Appendix A, Request #3: MERC agrees with CUB and LSAP's request to display the mock language on the Company's website in a conspicuous place.

- Appendix A, Request #4: MERC recommends that this issue be addressed by the Commission in Docket No. E,G-999/PR-YY-02, and recommends the average down payment amount, in dollars, be added to the Residential Customer Status Report monthly reporting template, on Tab 5, as shown in Attachment A to these Comments.
- Appendix A, Request #5: MERC agrees with Commission Staff in that this issue should be addressed in the utilities' Annual Service Quality reports.
- Appendix A, Request #6: Low-income program offerings contained within MERC's ECO program are offered and promoted to GAP participants. Information on MERC's ECO programs are filed with the Commission annually, and details on the current low-income programs are provided by the Company in the 2024-2026 Triennial ECO Plan and Status Reports in Docket No. G011/CIP-23-98. Therefore this request is duplicative and not needed, and no action by the Commission is warranted.

DATED: March 31, 2025

Respectfully submitted,



Joylyn Hoffman Malueg
Senior Project Specialist
Minnesota Energy Resources Corporation

Enclosure

cc: Service List

Residential Customer Status Report
Tab 5 - Payment Arrangements

# of customers with payment arrangements		Average Monthly Payment Amount	Average Number of Months in Current Payment Agreements					
Jan-25								
Feb-25								
Mar-25								
Apr-25								
May-25								
Jun-25								
Jul-25								
Aug-25								
Sep-25								
Oct-25								
Nov-25								
Dec-25								

Service Deposit Charged to Restore Service, Explain Practice (Y or N)	If yes, Service Deposit Amount, Average per Customer	Reconnection Fee Charged to Restore Service, Explain Practice (Y or N)	If yes, Reconnection Fee Amount, Average per Customer	Down Payment Required to restore service to start a payment arrangement, Explain Practice (Y or N), also list practice (i.e minimum of 10% of past due)	If yes, Average Down Payment Amount	If yes, Down Payment Amount, as Percent of Past Due Balance or Average Amount	Interest/ Penalties/Fees, Explain Practice (Y or N)	If yes, Interest/Penalties/Fee Amount, Average per Customer
Jan-25					\$	%		
Feb-25					\$	%		
Mar-25					\$	%		
Apr-25					\$	%		
May-25					\$	%		
Jun-25					\$	%		
Jul-25					\$	%		
Aug-25					\$	%		
Sep-25					\$	%		
Oct-25					\$	%		
Nov-25					\$	%		
Dec-25					\$	%		

*Practice is defined as when an action would be taken.

Residential Payment Arrangement Guidelines During Winter Moratorium MERC

Description: The Cold Weather Rule (CWR) can protect customers from disconnection during October 1 through April 30 as long as they are willing to enter into a Cold Weather Rule payment arrangement. **All customers need to be advised of the Cold Weather Rule.**

First verify, if the customer has had one broken Cold Weather Rule payment arrangement since Oct. 1 of the current season.

Example: Today's date is Oct. 10, check for broken Cold Weather Rule payment arrangements in the past 9 days. Or if today's date is Feb. 1, check for broken Cold Weather Rule payment arrangements since Oct. 1 of the prior year.

- If yes, the customer is not eligible for another CWR payment arrangement this season (Oct. 1 - April 30). Refer to **Not Eligible for Cold Weather Rule**.
- If no, offer a CWR payment arrangement. Refer to **Cold Weather Rule Eligible**.

If customer is interested in Gas Affordability Program (GAP), refer to the [Gas Affordability Program](#) page.

NOTE: My Account/Mobile App Bill Ready and Bill Due Date Approaching notifications communicate the full bill amount regardless of scheduled payments, posted payments or establishment of payment arrangements since the bill was issued.

Process:

Step	Action	
1. Access customer's contract.	1. Locate a Contract . 2. Review Contract Notes .	
2. Determine if customer has broken a previous CWR payment arrangement since October 1 of the current heating season.	IF:	THEN:
	Yes	Advise customer credit action will continue. Proceed to Step 3.
	No	Proceed to Cold Weather Rule Eligible .
	Review GAP eligibility as customer may be eligible.	

<p>3. Determine if customer is eligible for GAP.</p>	<p>NOTE: Refer to the Gas Affordability Program page for more details.</p> <ul style="list-style-type: none"> Has received Energy Assistance (EAP) in the most current heating season. Oct. 1 – Sept 30. Confirm account is not on ServiceChoice. <ul style="list-style-type: none"> If account is on ServiceChoice, the ServiceChoice will need to be transferred to a separate account. Refer to Create ServiceChoice Contract for Customers Enrolled in GAP. Agrees to make monthly payments. Explain that Minnesota Energy Resources Corp uses the income provided to EAP to calculate the GAP credit applied to the account. 	
	IF:	THEN:
	Eligible and customer would like to enroll	Proceed to Gas Affordability Program . Exit procedure.
	Not eligible or customer does not want to enroll	Proceed to Not Eligible for Cold Weather Rule .

Collapse All

Cold Weather Rule Eligible

Description: The Cold Weather Rule (CWR) can protect customers from disconnection during October 1 through April 30 as long as they are willing to enter into a Cold Weather Rule payment arrangement. **All customers need to be advised of the Cold Weather Rule.**

First verify, if the customer has had one broken cold weather rule payment arrangement since Oct. 1 of the current season.

Example: Today's date is Oct. 10, check for broken Cold Weather Rule payment arrangements in the past 9 days. Or if today's date is Feb. 1, check for broken Cold Weather Rule payment arrangements since Oct. 1 of the prior year.

- If yes, the customer is not eligible for another CWR payment arrangement this season (Oct. 1 - April 30). Refer to [Not Eligible for Cold Weather Rule](#).

- If no, continue with the below process, as a CWR payment arrangement needs to be offered.

NOTE: If customer agrees to the CWR payment arrangement:

- We will not require a down payment when setting up the payment arrangement.
- We would put through a [Reconnection](#) for those customers disconnected for non-payment

Process:

Step	Action	
1. Determine if the customer's Low Income attribute is set to Y.	<ul style="list-style-type: none">• View Customer Information. <p>Say: "Cold Weather Rule is available through April 30th. This payment arrangement provides protection for residential customers from being shut off if they cannot pay their bills in full.</p> <p><i>If you would provide me your monthly income I can see if you would be eligible for our low income CWR payment plan. If you are not eligible for the low income CWR payment plan, we also have a Cold Weather Rule payment plan for customer who are over income including customers who are disconnected.</i></p> <p><i>As long as you maintain your monthly payments during the CWR period, your services will be protected from disconnection.</i></p> <p><i>If you are at or below 50% of the state median income you will not be required to pay more the 10% of your monthly income towards your bill each month. If you believe you may be eligible and you have not yet received Energy Assistance, we encourage you to apply for this assistance."</i></p>	
	IF:	THEN:
	Yes	Proceed to Step 2.
	No	<p>Verify if the customer's income is at or below the LIHEAP guidelines. Refer to MERC Low Income Guidelines for those guidelines.</p> <p>Scripting: "If your income falls within the income guidelines for energy assistance, you may qualify for the Low Income Cold Weather Rule period payment arrangement. Can you share with me your monthly or yearly income?"</p>

		<ul style="list-style-type: none"> • If the customer qualifies, suggest they apply for EAP as they may be able to provide additional assistance. Proceed to Step 2. • If the customer does not qualify, proceed to Step 3.
2. Calculate monthly fixed payment amount for low income customer .	<ul style="list-style-type: none"> • Enter either customer's monthly or annual income into the CWR Low Income Payment Calculator to determine 10% and 5% of their income for a monthly fixed payment. • Review with customer if they will pay either the 10% or 5% fixed payment or if they agree to pay more. NOTE: We cannot require more than 10% payment, but the customer can agree to pay more. <p>NOTE: If customer states they currently have no income, advise the customer we can offer the minimum payment of \$20 per month until April 30.</p>	
	IF:	THEN:
	Customer agrees to fixed payment arrangement	<p>1. Before establishing the payment arrangement, if the customer is currently on the Gas Affordability Program (GAP) but chooses a CWR payment arrangement, inform customer the GAP percent of income credit and arrears forgiveness would stop. NOTE: The customer cannot be on both programs.</p> <ul style="list-style-type: none"> • Discuss the Cold Weather payment arrangement with customer and verify what the agreed upon monthly payment. • Add an Immediate Work Item. <ul style="list-style-type: none"> ○ Type: Refer to CAA ○ Workgroup: Low Income Support ○ New Remarks: Remove customer from GAP • Add a Contract Note indicating the customer agreed to a CWR payment arrangement and the payment arrangement terms. Add any additional pertinent information discussed with the customer. NOTE: Once Back Office removes the

		<p>customer from GAP they will setup the payment arrangement as documented in the contract notes.</p> <p>2. If there is a pending promised payment, do the following:</p> <ul style="list-style-type: none"> • Make note of all of the promised payment details, including the Vendor, Fund Source and Amount. • Cancel the pending promised payment. Refer to Assistance Agency Verbal Promise to Pay <p>3. Add a Payment Arrangement.</p> <p>NOTE: If the message "Message #200 "The task could not be completed. Contact technical support." is received, refer to the PDD/PPD Payment Arrangement Error Workaround</p> <ul style="list-style-type: none"> • Template: Cold Weather Rule • Type: Fixed • Enter number of installments. Installments should protect the customer through April 30 <i>Example:</i> The last installment due date may be after April 30, however cannot be before. <ul style="list-style-type: none"> ○ Enter the sum of all installments in the Original Amount field. <i>Example:</i> If six installments of \$50 enter \$300. If four installments of \$100 enter \$400. ○ Enter the appropriate # of installments. <p>OR</p> <p>If unable to set up a CWR payment arrangement because the contract is new and there is no billing or meter reading associated with the contract, do the following:</p> <ul style="list-style-type: none"> • Add a Contract Note.
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		<ul style="list-style-type: none"> ○ New Remark: Fixed amount of customer payment • Add a Note Follow-up <ul style="list-style-type: none"> ○ Work item type: Refer to CAA ○ Workgroup: Low Income Support ○ Instructions: Add CWR payment arrangement <terms/installment amount> once Turn On is completed. • Direct Transfer Finalled Contract Balance if NPSO account is not written off and/or assigned to a collection agency. <p>OR</p> <p>Create a work items to have the debt transferred if the NPSO account is written off and/or assigned to a collection agency. Refer to Bad Debt Inquiries.</p> <p>4. Re-enter the promised payment, if cancelled to establish payment arrangement. Refer to Assistance Agency Verbal Promise to Pay</p> <p>5. Advise customer:</p> <ul style="list-style-type: none"> • If payments are not received each month, they may no longer be protected from collection activity, up to and including disconnection. • Also remind customer, once the CWR payment is complete (if they still have arrears) they should contact us to discuss additional payment arrangement options to prevent future collection activity, including disconnection. <p>6. If NPSO order is scheduled but not for today, cancel the NPSO. Refer to Cancel an Order.</p> <p>OR</p> <p>If NPSO order is scheduled for today, do the following:</p> <ul style="list-style-type: none"> • Advise the customer: <i>"The disconnection of your service is scheduled for today. Your service may have been</i>
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disconnected already or could be in the process of being disconnected. I can accept your payment/and or arrangement, but am unable to guarantee your service has not already been disconnected or will be disconnected. I will attempt to stop the disconnection; however if it has already occurred or is in the process, you will need to call back to get reconnected."

- Contact leader/Chat SR.
NOTE: Leader/Chat SR will reach out to Dispatch to have the order cancelled.

OR

If disconnected, enter a [Reconnection](#) order.

- A reconnection fee will be assessed and appear on the customer's next bill. Refer to [Charges for Specific Services](#).
- MERC reconnects within the next 24 hours year-round.
NOTE: MERC CWR is Oct. 1 - April 30.
 - Prior to 1 p.m. CT., schedule the order for the same day:
 - Enter today's date in the **Wanted Date** field.
 - Select **Normal Completion** from the **Completion Method** drop down list.
 - After to 1 p.m. CT., schedule the order for the next day:
 - Enter tomorrow's date in the **Wanted Date** field.
 - Select **Normal Completion** from the **Completion Method** drop down list.

		<p>7. Modify a Contract Attribute, if necessary.</p> <ul style="list-style-type: none"> Select Yes from the Customer is Low Income drop down list. <p>8. Add a Contract Note, indicating that this is a CWR payment arrangement and the arrangement terms. Add anything else pertinent that was discussed with the customer. <i>Example:</i> If the customer was on GAP but requested a CWR payment agreement and advised GAP would be removed.</p> <p>Exit procedure.</p>
	<p>Customer does not agree to fixed payment arrangement</p>	<ul style="list-style-type: none"> Review Gas Affordability Program as an option for the customer. <ul style="list-style-type: none"> Explain that the GAP credit cannot be provided at this time, as it is determined by the enrollment center. If customer would like to enroll in GAP, proceed to Gas Affordability Program. If the customer is not interested in GAP: <ul style="list-style-type: none"> Advise customer they have the right to appeal to the Minnesota Public Utilities Commission. <ul style="list-style-type: none"> Customer can appeal after October 1 and cannot appeal a broken CWR payment arrangement. To appeal the customer needs to file an appeal with the Public Utility Commission. <ul style="list-style-type: none"> The customer will need to share the payment arrangement they are proposing. Transfer customer to a leader.

		<ul style="list-style-type: none"> ▪ The leader will follow the Appeal process. NOTE: If a leader is not available, refer to the Complaint Management process and issue a Customer Contact - Supervisor Callback form on the Customer Care Center site. • If customer chooses not to appeal, advise customer that the collection process will continue. • Add a Contract Note, include that the customer did not agree to the CWR payment arrangement and that they were provided with the appeal process details. <p>Exit procedure.</p>
<p>3. Calculate monthly Fixed + Current payment amount for non-low income customer.</p>	<p>Negotiate a Fixed + Current payment arrangement around the customers current bill due date using the CWR Non Low Income Payment Calculator.</p> <ul style="list-style-type: none"> • Monthly payments to consist of current bill plus a fixed payment on the arrears until April 30. • Installments should protect the customer through April 30 <i>Example:</i> The last installment due date may be after April 30, however cannot be before. 	
	<p>IF:</p>	<p>THEN:</p>

	<p>Customer agrees to Fixed + Current payment arrangement</p>	<p>1. If there is a pending promised payment, do the following :</p> <ul style="list-style-type: none"> • Make note of all of the promised payment details, including the Vendor, Fund Source and Amount. • Cancel the pending promised payment. Refer to Assistance Agency Verbal Promise to Pay <p>2. Add a Payment Arrangement. NOTE: If the message “<i>Message #200 “The task could not be completed. Contact technical support.”</i>” is received, refer to the PDD/PPD Payment Arrangement Error Workaround</p> <ul style="list-style-type: none"> • Template: Cold Weather Rule • Type: Fixed + Current • Monthly payments to consist of current bill plus a fixed payment on the arrears until April 30. Installments should protect the customer through April 30. <i>Example:</i> The last installment due date may be after April 30, however cannot be before <ul style="list-style-type: none"> ○ Enter the sum of all installments in the Original Amount field. <i>Example:</i> If six installments of \$50 enter \$300. If four installments of \$100 enter \$400. ○ Enter the appropriate # of installments. ○ Remove amount from the Down Payment Amount field. <p>OR</p> <p>If unable to set up a CWR payment arrangement because the contract is new and there is no billing or meter reading associated with the contract, do the following:</p> <ul style="list-style-type: none"> • Add a Contract Note <ul style="list-style-type: none"> ○ New Remark: Fixed amount of customer payment
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		<ul style="list-style-type: none"> • Add a Note Follow-up <ul style="list-style-type: none"> ○ Work item type: Refer to CAA ○ Workgroup: Low Income Support ○ Instructions: Provide detailed information regarding the exact amounts to be setup on the payment arrangement once it can be established. • Direct Transfer Finalled Contract Balance if NPSO account is not written off and/or assigned to a collection agency. <p>OR</p> <p>Create a work items to have the debt transferred if the NPSO account is written off and/or assigned to a collection agency. Refer to Bad Debt Inquiries.</p> <ol style="list-style-type: none"> 3. Re-enter the promised payment, if cancelled to establish payment arrangement. Refer to Assistance Agency Verbal Promise to Pay 4. Advise customer: <i>"Please be aware the terms we've discussed are in addition to all new and current charges. All new bills must be paid in full by the due date stated on the bill. If the terms are not kept as promised, your account may be removed from the Cold Weather Rule protection. Your account will then start the collections process and you will not be eligible for Cold Weather Rule protection for the remained of the season."</i> NOTE: Do not advise customers of the specific due date for each monthly installment. Payment should be made on or before the due date on each monthly billing statement. 5. Add a Contract Note, indicating that this is a CWR payment arrangement and the arrangement terms. Add anything else pertinent that was discussed with the customer 6. Advise customer: <ul style="list-style-type: none"> • If payments are not received each month, they may no longer be protected from collection activity, up to and including disconnection.
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		<ul style="list-style-type: none"> Also remind customer, once the CWR payment is complete (if they still have arrears) they should contact us to discuss additional payment arrangement options to prevent future collection activity, including disconnection. Scripting: <i>"Once you've received your April bill, we would encourage you to call back to set up arrangements on the remaining balance to ensure your account is not subject to disconnection after the end of the Cold Weather Rule period."</i> <p>7. If NPSO order is scheduled but not for today, cancel the NPSO. Refer to Cancel an Order.</p> <p>OR</p> <p>If NPSO order is scheduled for today, do the following:</p> <ul style="list-style-type: none"> Advise the customer: <i>"The disconnection of your service is scheduled for today. Your service may have been disconnected already or could be in the process of being disconnected. I can accept your payment/and or arrangement, but am unable to guarantee your service has not already been disconnected or will be disconnected. I will attempt to stop the disconnection; however if it has already occurred or is in the process, you will need to call back to get reconnected."</i> Contact leader/Chat SR. NOTE: Leader/Chat SR will reach out to Dispatch to have the order cancelled. <p>OR</p> <p>If disconnected, enter a Reconnection order.</p> <ul style="list-style-type: none"> A reconnection fee will be assessed and appear on the customer's next bill. Refer to Charges for Specific Services. MERC reconnects within the next 24 hours year-round. NOTE: MERC CWR is Oct. 1 - April 30. <ul style="list-style-type: none"> Prior to 1 p.m. CT., schedule the order for the same day:
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		<ul style="list-style-type: none"> ▪ Enter today's date in the Wanted Date field. ▪ Select Normal Completion from the Completion Method drop down list. ○ After to 1 p.m. CT., schedule the order for the next day: <ul style="list-style-type: none"> ▪ Enter tomorrow's date in the Wanted Date field. ▪ Select Normal Completion from the Completion Method drop down list. <p>8. Add a Contract Note, indicating that this is a CWR payment arrangement and the arrangement terms. Add anything else pertinent that was discussed with the customer. <i>Example:</i> If the customer was on GAP but requested a CWR payment agreement and advised GAP would be removed.</p> <p>Exit procedure.</p>
	Customer does not agree to fixed payment arrangement	<ul style="list-style-type: none"> • Advise customer they have the right to appeal to the Minnesota Public Utilities Commission. <ul style="list-style-type: none"> ○ Customer can appeal after October 1 and cannot appeal a broken CWR payment arrangement. ○ To appeal the customer needs to file an appeal with the Public Utility Commission. <ul style="list-style-type: none"> ▪ The customer will need to share the payment arrangement they are proposing. ○ Transfer customer to a leader. <ul style="list-style-type: none"> ▪ The leader will follow the Appeal process. NOTE: If a leader is not available, refer to the Complaint

		<p>Management process and issue a Customer Contact - Supervisor Callback form on the Customer Care Center site.</p> <ul style="list-style-type: none"> • If customer chooses not to appeal, advise customer that the collection process will continue. • Add a Contract Note, include that the customer did not agree to the CWR payment arrangement and that they were provided with the appeal process details. <p>Exit procedure.</p>
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Not Cold Weather Rule Eligible

Description: The MERC winter moratorium is Oct. 1 through April 30. This process is for customers who are not eligible for a Cold Weather Rule (CWR) payment arrangement, as they already had a broken CWR payment arrangement since Oct. 1.

If a customer has not had a broken Cold Weather Rule payment arrangement since Oct. 1, then one needs to be offered. Refer to [Cold Weather Rule Eligible](#).

NOTES:

- If the customer is requesting to be set up on Budget Billing, the full balance must be included in an active payment arrangement first. Advise the customer that the down payment must be made for the payment arrangement to become active and then Budget Billing will be setup.
- Payment arrangements should include service charges only. Do not include non-service charges.
- Payment arrangements should not be established on the same date an account is scheduled to bill.
- ServiceChoice customer cannot be more than one month delinquent in order to issue a service order.
- There is an issue with the Pay Agreements tab only displaying the Copay template for some accounts. If this occurs, establish the payment arrangements with the Copay template and complete the remaining steps of the process as normal.

Payment Arrangement Terms Summary

The following are the minimum down payment amounts and maximum monthly installments that can be offered to customers:

Customer/Premise Type	Down Payment	Normal Installments	New Installments
Residential	40%	6	18
Commercial	65%	3	6
Commercial Flex: negotiate down to 40%, if needed	65%	3	6

* Customer must speak with an agent for low-income terms.

NOTE: If commercial with living quarters, **during moratorium** follow Residential guidelines above.

Process:

Step	Action	
1. Access customer's contract.	1. Locate a Contract. 2. Review Contract Notes.	
2. Determine if customer has broken a previous CWR payment arrangement since October 1 of the current heating season.	IF:	THEN:
	No	Refer to Cold Weather Rule Eligible.
	Yes	Proceed to Step 3.
	IF:	THEN:

<p>3. Determine if today is past the MPO due date.</p>	<p>Yes</p>	<ul style="list-style-type: none"> • The MPO offering is no longer applicable. • Offer customer a payment arrangement. Negotiate down to minimum down payment of 40% AND installments up to 18 months on the balance. • Advise customer: <ul style="list-style-type: none"> ○ The disconnection may be scheduled at any time and unable to guarantee service. ○ Contact us once the down payment has been made and we'll verify payment and attempt to stop NPSO. ○ If the down payment is received by the expected date, a confirmation e-mail (if on file) or letter will be sent with the terms of the payment arrangement • If applicable, also advise customer of the Gas Affordability Program (GAP) and suggest for customer to apply for energy assistance. • Encourage the customer to use one of our convenient self-service options to establish payment arrangements in the future. <ul style="list-style-type: none"> ○ Advise the customer, he/she will need the account number, name as it appears on the bill and the last 4-digits on the SSN, and will be required to make a down payment and select the number of months to pay the remaining balance. • If customer makes the required payment, take the following action based on the scenario: <ul style="list-style-type: none"> ○ NPSO order is scheduled but not for today, cancel the NPSO
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	<p>order. Refer to Cancel an Order.</p> <ul style="list-style-type: none">○ If NPSO order is scheduled for today, do the following:<ul style="list-style-type: none">▪ Advise the customer: <i>"The disconnection of your service is scheduled for today. Your service may have been disconnected already or could be in the process of being disconnected. I can accept your payment/and or arrangement, but am unable to guarantee your service has not already been disconnected or will be disconnected. I will attempt to stop the disconnection; however if it has already occurred or is in the process, you will need to call back to get reconnected."</i>○ Contact leader/Chat SR. NOTE: Leader/Chat SR will reach out to Dispatch to have the order cancelled. <p>OR</p> <p>If disconnected, enter a Reconnection order.</p> <ul style="list-style-type: none">• A reconnection fee will be assessed and appear on the customer's next bill. Refer to Charges for Specific Services.• Add a Contract Note <p>Exit procedure.</p>
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	No	<ul style="list-style-type: none">• Customer must pay MPO amount in full prior to disconnection notice due date to guarantee service.• Advise customer if down payment not paid by the disconnection notice due date, disconnection process/credit activity will continue.• If applicable, also advise customer of the Gas Affordability Program (GAP) and suggest for customer to apply for energy assistance.• Encourage the customer to use one of our convenient self-service options to establish payment arrangements in the future.<ul style="list-style-type: none">○ Advise the customer, he/she will need the account number, name as it appears on the bill and the last 4-digits on the SSN, and will be required to make a down payment and select the number of months to pay the remaining balance.• Add a Contract Note <p>Exit procedure.</p>
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CWR Low Income Payment Calculator

Customer provides Monthly
Income Amount:

	10 % of Income	5 % of Income
Input Customer's Monthly Income Amount	\$0.00	\$0.00
This Amount is the Calculated Monthly Fixed Payment	\$0.00	\$0.00

Customer provides Annual
Income Amount:

	10% of Income	5 % of Income
Input Customer's Annual Income Amount	\$0.00	\$0.00
This Amount is the Calculated Monthly Fixed Payment	\$0.00	\$0.00

MERC Low Income Guidelines

Description: These guidelines indicate if a customer is considered low income. Eligibility for Energy Assistance and Cold Weather Rule is based on customers' household size and income.

Annual Income Guidelines (2024 - 2025)

For household size 1-16, based on 50% State Median Income (SMI). For household size 17 - 20, based on Federal Poverty Guidelines (FPG).

Household Size	Annual Income	One-month Maximum
1	\$35,799	\$2,983
2	\$46,814	\$3,901
3	\$57,829	\$4,819
4	\$68,845	\$5,737
5	\$79,860	\$6,655
6	\$90,875	\$7,572
7	\$92,940	\$7,745
8	\$95,006	\$7,917
9	\$97,071	\$8,089
10	\$99,136	\$8,261
11	\$101,202	\$8,433
12	\$103,267	\$8,605
13	\$105,332	\$8,777
14	\$107,398	\$8,949
15	\$109,463	\$9,121
16	\$111,528	\$9,294
17	\$113,594	\$9,466
18	\$117,173	\$9,764
19	\$123,091	\$10,257
20	\$129,009	\$10,750

CWR Non-Low Income Enrollment

Enter Arrears

\$0.00

The month the customer calls corresponds to a calculated Fixed Payment amount to be added to the monthly current bill.	Month customer calls	1st Offer	2nd Offer	3rd Offer
	Oct - Nov	\$0.00	\$0.00	\$0.00
	Dec	\$0.00	\$0.00	\$0.00
	Jan	\$0.00	\$0.00	\$0.00
	Feb - April 15	\$0.00	\$0.00	\$0.00

MERC Cold Weather Rule Escalated Call and Appeal

Description: Care Center Supervisors process. During the winter months (Oct. 1 - April 30) customers can request to be set up on a Cold Weather Rule (CWR) payment arrangement. If the customer does not agree to the payment terms negotiated by the supervisor, we must advise the customer of an appeal process. Customers can appeal beginning Oct. 1. During this timeframe, the customer has 10 days to submit the appeal.

- During this 10 days the customer will not be disconnected.
- There is no limit as to how many times a customer can appeal, but they cannot appeal once a payment arrangement has been broken this heating season.
NOTE: If the customer has a broken payment arrangement this heating season they are not eligible to appeal.

Care Center supervisors will send the customer an appeal form that needs to be filed with the Public Utility Commission. If the Public Utility Commission does not receive the form within 10 business days, the account will start over in the collections path. Refer to [Cold Weather Rule](#).

Process:

Step	Action	
1. Verify customer name and location.	1. Locate a Contract . NOTE: Do not to rely on screen pops for an address. 2. Select appropriate contract in Results group box, if necessary.	
2. Attempt to negotiate a payment arrangement.	Review payment arrangement offered to customer and attempt to negotiate.	
	IF:	THEN:
	Customer does not want to appeal.	Advise customer that the collection process will continue. Exit procedure.
	Customer would like to appeal	Proceed to Step 3.

<p>3. Provide appeal information and send appeal form.</p>	<ol style="list-style-type: none">1. Verify if mailing address is correct, if form will be mailed.2. Modify a Contract Attribute.<ul style="list-style-type: none">• Select WPP-MI Reqst App from the Assigned to Credit attribute drop down list. NOTE: This prevents the customer from going through credit activity for 1- days. Open-clS automatically removes the attribute after 10 days.3. Complete the Escalate Support form with the required information, including the customer's e-mail address or mailing address.4. Add a Contract Note.<ul style="list-style-type: none">• New Remark: What payment arrangement was offered to the customer and that they declined the offer. Include how the form was sent.
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CERTIFICATE OF SERVICE

I, Colleen T. Sipiorski, hereby certify that on the 31st day of March, 2025, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of MERC Reply Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 31st day of March, 2025.

/s/ Colleen T. Sipiorski

Colleen T. Sipiorski

Last Name	First Name	Email	Organization	Agency	Delivery Method	Alternate C	View Trade Service List
Anderson	Kristine	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		Electronic Service	No	PR-25-2
Baumtrog	Ryan	ryan.baumtrog@state.mn.us		Minnesota Dept of Housing	Electronic Service	No	PR-25-2
Brodin	Matthew	mbrodin@allete.com	Minnesota Power		Electronic Service	No	PR-25-2
Commerce Attorneys	Generic	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Electronic Service	Yes	PR-25-2
Crawford	Brandon	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		Electronic Service	No	PR-25-2
Dahlberg	Beverly	bevdahlberg@nweco.com	Northwestern Wisconsin Electric Co.		Electronic Service	No	PR-25-2
Dockter	Bridget	bridget.dockter@xcelenergy.com			Electronic Service	No	PR-25-2
Edstrom	Brian	briane@cubminnesota.org	Citizens Utility Board of Minnesota		Electronic Service	No	PR-25-2
Elwood	Ron	relwood@mnlsap.org	Legal Services Advocacy Project		Electronic Service	No	PR-25-2
Ferguson	Sharon	sharon.ferguson@state.mn.us		Department of Commerce	Electronic Service	No	PR-25-2
Glumack	Jenny	jenny@mrea.org	Minnesota Rural Electric Association		Electronic Service	No	PR-25-2
Heinen	Adam	aheinen@dakotaelectric.com	Dakota Electric Association		Electronic Service	No	PR-25-2
Jacobson	Travis	travis.jacobson@mdu.com	Great Plains Natural Gas Company		Electronic Service	No	PR-25-2
Kegel	Jack	jkegel@mmua.org	MMUA		Electronic Service	No	PR-25-2
Kremeier	Collin	ckremeier@otpc.com	Otter Tail Power Company		Electronic Service	No	PR-25-2
Levenson Falk	Annie	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		Electronic Service	No	PR-25-2
Loos	Jason	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		Electronic Service	No	PR-25-2
Moe	Darrick	darrick@mrea.org	Minnesota Rural Electric Association		Electronic Service	No	PR-25-2
Moeller	David	dmoeller@allete.com	Minnesota Power		Electronic Service	No	PR-25-2
Peterson	Jennifer	jjpeterson@mnpower.com	Minnesota Power		Electronic Service	No	PR-25-2
Residential Utilities Division	Generic Notice	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Electronic Service	Yes	PR-25-2
Schinzing	Jodi	jodischinzing@nweco.com	Northwestern Wisconsin Electric Company		Electronic Service	No	PR-25-2
Schultz	Lori	lorischultz@minncap.org	Minnesota Community Action Partnership		Electronic Service	No	PR-25-2
Seuffert	Will	will.seuffert@state.mn.us		Public Utilities Commission	Electronic Service	Yes	PR-25-2
Stasik	Richard	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		Electronic Service	No	PR-25-2
Teiken	Katherine	katherine.teiken@state.mn.us			Electronic Service	No	PR-25-2

Name