

March 17, 2021

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. G008/M-20-889

Dear Mr. Seuffert,

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources in the following matter:

In the Matter of an Inquiry into CenterPoint Energy's Investments that May Assist in Minnesota's Economic Recovery from the COVID-19 Pandemic.

The petition was filed on December 18, 2020 by:

Amber Lee  
Director, Regulatory Affairs  
CenterPoint Energy  
505 Nicollet Mall  
PO Box 59038  
Minneapolis, MN 55459-0038

The Department recommends that the Minnesota Public Utilities Commission (Commission) **defer a decision until a full representation of the rate impact of the recent polar vortex is provided by CenterPoint.** The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE  
Rate Analyst Coordinator

SLP/ja  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G008/M-20-889

#### I. BACKGROUND

On May 20, 2020, the Minnesota Public Utilities Commission (Commission) opened an *Inquiry into Utility Investments that May Assist Minnesota's Economic Recovery from the COVID-19 Pandemic*, and issued a *Notice of Reporting Required by Utilities* (Docket No. E,G999/CI-20-492) seeking information from all rate-regulated electric and gas utilities in Minnesota on ongoing, planned or proposed investment projects that meet the following conditions:

- Provide significant utility system benefits;
- Are consistent with approved resource plans, approved natural gas distribution infrastructure or pipeline safety plans, triennial conservation plans and existing Commission orders;
- Reduce carbon or other pollutant emissions in the power sector or across energy sectors;
- Increase access to conservation and clean energy resources for Minnesotans;
- Create jobs or otherwise assist in economic recovery for Minnesotans; and
- Use woman, veteran, or minority owned businesses as much as possible and provide documentation of these efforts.

On December 18, 2020, CenterPoint Energy (CPE or the Company) filed a petition requesting Commission approval of seven<sup>1</sup> investment projects which the Company which would assist Minnesota's economic recovery and met the Commission's criteria.

On January 15, 2020, the Commission issued a *Notice of Comment Period*, seeking comment on the following:

- Should the Commission approve immediate implementation of one or more of CPE's proposed Tranche 1 investments?
- Should the Commission approve CPE's request for approval of deferred accounting for its Tranche1 investments?
- If deferred accounting is approved, should carrying costs be approved?
- Are additional reporting metrics needed?
- Are there other issues or concerns related to this matter?

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<sup>1</sup> CPE's petition contained seven projects; however, one of the projects, Advanced Metering infrastructure has been separately docketed in Docket No. G008/M-21-48.

## II. SUMMARY OF THE FILING

CenterPoint proposes a total of seven projects which it asserts represent incremental investment spending that the Company can move forward in assisting Minnesota's economy. The seven projects are:

1. Accelerated Pipe Replacement
2. Renewable Hydrogen Projects
3. High-Tech Demonstration Kitchen
4. Workforce Training and Development
5. Damage Prevention Campaign
6. Translation Project
7. Advanced Meter Project

Projects #1-6 will be discussed in these comments. Project #7 is separately docketed in G008/M-21-48. CenterPoint estimates total incremental investment spending on Projects #1-6 at \$53.8 million, resulting in an estimated 185 permanent and temporary jobs. A brief summary of the proposed projects follows.

### 1. *Accelerated Pipe Replacement*

In recent years, CenterPoint has undertaken to replace bare steel main and legacy polyethylene main pipeline as part of its distribution integrity management program (DIMP) and to comply with Federal pipeline standards. The Company proposes to accelerate its replacement project to assist Minnesota's recovery efforts from the COVID-19 pandemic. Specifically, CenterPoint proposes to increase its capital spending on pipe replacement by \$31.8 million, resulting in an estimated revenue requirement of \$2.9MM per year in 2022 and 2023.

### 2. *Renewable Hydrogen Projects*

CenterPoint currently has a 1 MW renewable hydrogen pilot project underway that it expects to begin operation in 2021. With the existing pilot, CenterPoint plans to purchase renewable electricity to produce hydrogen which it will use to blend into the Company's energy provided to customers. The Company proposed two additional renewable hydrogen pilot projects, one to be developed in 2022 and one in 2023, as part of its economic development spending.

The proposed 2022 hydrogen project is expected to be a 1.0-1.5 MW electrolyzer. The Company estimates the total capital project would be \$2.5 MM, with \$69,000 in O&M expenses and a first-year energy supply costs of \$500,000. The total revenue requirement over the life of the project is estimated at \$63.8 MM.

The proposed 2023 hydrogen project is expected to be slightly larger at 1.5 – 2.0 MW, and to have a \$3.0 MM capital cost, \$79,000 in O&M expenses and first year energy supply costs of \$750,000. The total revenue requirement of the project is estimated at \$91.2.

3. *High-Tech Demonstration Kitchen*

CenterPoint proposes to replace its existing Commercial Foodservice Learning Center (CFLC) with the High-Tech Demonstration Kitchen. The Company states that office space at its current location is constrained, thus making expansion of the existing kitchen infeasible. Replacement of its existing kitchen would cost approximately \$ 6 million.

4. *Workforce Training and Development*

CenterPoint proposes to invest approximately \$2.5 million in additional spending on worker training and development. The Company proposes to provide funding and scholarships with area trade schools, and to work with non-profits to fund internships in the areas of energy efficiency. In addition, CenterPoint proposes to target funds towards improving workforce diversity in energy efficiency programs.

5. *Damage Prevention Campaign*

CenterPoint proposes to invest approximately \$1 million in capital and \$5 million in additional O&M to target damage prevention on its distribution system. Specifically, the Company proposes to:

1. spend \$3 million in O&M to audit excavators with the most locate requests and damage incidents;
2. Create an ambassador program for the top 20 cities by number of locate requests at a cost of \$2 million; and
3. Complete research and field verification to compile and verify service line information in the Company's geographic information system at a capital cost of approximately \$1 million.

6. *Translation Project*

CenterPoint proposes to issue an RFP to hire a contractor to translate customer information posted on its website, including rates and billing information, natural gas safety information, and energy efficiency program information into Spanish, Hmong, and Somali. The Company estimates the cost of translating its website information to be \$2 million in incremental O&M expenses.

Along with seeking Commission approval to proceed with each of these projects, the Company requests the Commission authorize deferred accounting of incremental operations and maintenance (O&M) expense incurred for the projects, and actual depreciation expense and return on capital investments at a return of 6.86 percent, the cost of capital agreed to in the Company's most recent rate case (Docket No. G008/GR-19-526). CenterPoint proposes to continue the deferral until approval of recovery of the balance in the Company's next rate case. In addition, the Company seeks approval of carrying costs on the tracker balance at the its most recently authorized cost of capital.

### III. DEPARTMENT ANALYSIS

The Department's comments are divided into three sections: 1) a discussion of each of CenterPoint's proposed investment projects; 2) a discussion of the Company's request for deferred accounting; and 3) a discussion of the proposed projects in light of the rate impact of the recent polar vortex.

The Department has relied on the directives contained in existing rules and statutes requiring investments to be in the public interest, ensure the provision of reliable service, and result in reasonable rates in its review of CenterPoint's proposed Tranche I projects. In general, the Department has focused its review on the reasonableness of each project and the balance between the benefits ratepayers may receive from improved reliability, and more energy savings with the added cost to ratepayers.

Since CenterPoint filed its Tranche I projects, energy markets have been roiled by a record cold snap that affected generation and transmission in parts of the country, and drove natural gas prices sky high. The Department will address recent events along with the Company's request for deferred accounting at the end of its comments.

#### A. CENTERPOINT PROPOSED TRANCHE I PROJECTS

##### 1. Accelerated Pipe Replacement

In recent years, CenterPoint has undertaken a Distribution Integrity Management Program (DIMP) to replace certain bare steel mains and legacy polyethylene mains to ensure reliability and Company compliance with federal pipeline standards. The Company proposes to accelerate its pipe replacement program with incremental capital spending of approximately \$31.8 million in 2021. The estimated revenue requirement of the accelerated spending is \$2.9 million in 2022 and in 2023.

In response to DOC IR No. 2, CenterPoint states that it currently plans to spend \$27.5 million on Bare Steel Main Replace and \$2.4 million on Legacy Plastic Service Line Replacement in 2021. The Department understands the spending proposed in this proceeding for pipe replacement would be in addition to the Company's planned spending. The Department recommends approval of CenterPoint's proposed accelerated pipe replacement project, and recommends the Company be directed to separately track accelerated pipe replacement expenditures from its existing pipe replacement spending.

##### 2. Renewable Hydrogen Projects

The Department recommends denial of CenterPoint's proposed renewable hydrogen projects. As noted in the Company's filing, the existing renewable hydrogen project is expected to begin operation in 2021. With respect to the existing renewable hydrogen pilot, the Company states,

The projected capital expenditures in 2021 for the pilot is \$1,988,000. The Company projects \$14,000 of O&M expenses, and \$100,000 for energy supply costs to be recognized via the PGA to occur in 2021. The Company projects the hydrogen will offset 21,000 Dekatherms of natural gas annually.<sup>2</sup>

CenterPoint's projected spending on the two proposed projects appears inconsistent with its projections for its existing project. For example, in response to DOC IR No. 3, the Company expects \$14,000 in O&M expenses for its current renewable hydrogen project, but between \$69,000 and \$79,000 in O&M expenses for its proposed projects. Before undertaking additional renewable hydrogen projects with the potential of a \$150 million revenue requirement over their lives, the Department recommends the Company evaluate the operation and performance of its existing project. The Department recommends denial of CenterPoint's proposed Renewable Hydrogen Project.

### 3. High-Tech Demonstration Kitchen

The Department has reviewed CenterPoint's proposal for its High-Tech Demonstration Kitchen, and recommends denial. CenterPoint has an existing kitchen that appears to be serving its needs at this time. In response to a Department IR asking about the Company's plans to modify its CIP goals or make program design changes to the Commercial & Industrial Training and Education program or to the Commercial Foodservice and Equipment Rebates Program, the Company responded that it expects any changes to occur once the kitchen is fully operational in 2023. In addition, CenterPoint noted that it,

may adjust participation goals and budget for the Commercial Foodservice Equipment Rebate program, but given current and ongoing economic uncertainties in the foodservice industry, adjustments to the Company's already ambitious participation and energy savings goals will need to depend on future market conditions.<sup>3</sup>

From CenterPoint's response, the Department concludes that while replacing the existing CFCL may be necessary at some future point in time, its current replacement will not necessarily result in additional participation or energy savings through the Company's CIP Programs. The Department acknowledges that spending on the High-Tech Kitchen is expected to result in a minimal residential ratepayer impact; however, the Department does not favor spending for its own sake. CenterPoint indicates that it already has "ambitious participation and energy savings goals" in place with their existing CFLC, and unless and until conditions improve in the foodservice industry these goals may not change. The Department recommends denial of the High-Tech Kitchen Project.

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<sup>2</sup> CenterPoint response to DOC IR No. 3, Attachment A.

<sup>3</sup> CenterPoint Response to DOC IR No. 6.

#### 4. Workforce Training and Development

CenterPoint proposes to invest approximately \$2.5 million to provide funding and scholarships for workforce training programs in weatherization programs, and to partner with non-profits to provide funding for internships, and to focus on increasing the number of participants from BIPOC communities. In response to DOC IR No. 8, CenterPoint states that goals for weatherization under its current 2021-2023 Triennial CIP plan are unlikely to be affected by the Company's funding for workforce training, but that such efforts and spending may influence goals in its 2024-2026 Triennial CIP Plan.

CenterPoint's spending proposal on workforce training can have an impact on future job opportunities for participants, and encourage additional spending on energy efficiency and weatherization in the future. The Department recommends approval.

#### 5. Damage Prevention Campaign

In 2020, CenterPoint's planned and actual spending on damage prevention costs were \$4.9 million and \$5.5 million, respectively. The Company states that the increase was the result of an increase in locate requests, and higher vendor contract costs. CenterPoint proposes to spend an additional \$5 million on a damage prevention campaign, including auditing excavators, creating a city ambassador program for the top 20 cities with the most locate requests, and \$1 million for completion of research and field verification to verify service line information in the Company's GIS system.

The Department recommends the Commission approve spending on the verification of line information in CenterPoint's GIS system, but reject the other spending components. CenterPoint indicates that it currently audits its locators, and has processes in place to reach out to excavators with frequent or recurrent issues. Consequently, the Department does not see significant benefit from additional spending on an audit. The City Ambassador Project is intended to assign CenterPoint personnel to work with specific city engineering and permitting departments to coordinate activity. As with the excavator audit, the Department does see sufficient additional benefit from the City Ambassador spending proposal over the Company's current processes.

Finally, the Department recommends the Commission approve spending on the verification of line information in CenterPoint's GIS system. The Company states that it has approximately 45,000 older records that have not yet been digitized and may require additional research before being input into the Company's digital records. The Department recommends approval of the approximately \$1 million in spending on this project. Ensuring the completeness and validity of the Company's service line information in the Company's GIS system will assist in damage prevention in the location and excavation work going forward.

### 6. Translation Project

CenterPoint currently has customer service personnel capable of assisting non-English speaking customers, the Company proposes to spend approximately \$2 million in additional O&M expense to translate information on its website into Spanish, Hmong, and Somali. The Company incurred \$1,248 in 2020 for translation expense related to Minnesota's Energy Assistance Program. The Department supports approval of CenterPoint's translation project because equitable access to information is important for all customers.

### 7. Summary of Department recommendations on Tranche I Projects

As discussed in detail below, the Department recommends the Commission defer a decision on all CenterPoint's Tranche I projects until a full understanding of the impact of the recent polar vortex on customer bills is understood. If and when the Commission moves forward with the Tranche I projects, the Department recommends Commission approval of the following projects:

- Accelerated Pipe Replacement;
- Workforce Training and Development;
- Completion of the Digitization of service line location component of the Damage Prevention Campaign;
- Translation Project.

The Department recommends denial of the following projects:

- Renewable Hydrogen Projects;
- High-Tech Demonstration Kitchen;
- The audit and City Ambassador components of the Damage Prevention Campaign

### *B. REPORTING*

The Department recommends CenterPoint be directed to submit annual compliance filings detailing the following information for each of the projects approved by the Commission:

- Separately track and report the amount of capital and O&M spending for each project;
- The scope of proposed work and scope of work completed;
- The total number of people hired for the project; a breakdown between company employees and outside contractors, permanent and part-time, and the number of women, veterans, and BIPOC employed;



### C. DEFERRED ACCOUNTING

CenterPoint is requesting to apply deferred account to future costs and revenues associated with its Tranche I projects. The Department addresses how deferred accounting treatment is typically used and its application to CenterPoint's Tranche I projects.

#### 1. Use of Deferred Accounting

The Commission has broad authority under Minn. Stat. Section 216B.10 to address the necessary accounting, reporting, and auditing of public utilities under the Commission's jurisdiction. Additionally, Minn. Rule 7825.0300, Subparts 1 and 2 confirm the adoption of the Federal Energy Regulatory Commission (FERC)<sup>4</sup> Uniform System of Accounts (USofA), with some clarifications. The USofA FERC Account 182.3 – *Other Regulatory Assets* allows for deferred accounting to create regulatory assets that result from the ratemaking actions of regulatory agencies.

Utilities have occasionally framed deferred accounting as an exception to the USofA under Minn. Rule 7825.0300, Subpart 4. Because the USofA – specifically, FERC Account 182.3 – does provide a mechanism for deferred accounting, the Department does not believe an exception to the USofA is needed. Nevertheless, the Code of Federal Regulations necessitates that utilities justify requests to use deferred accounting and obtain approval from the appropriate regulatory agency (in this instance, the Commission) in order to defer expenses and investments for possible future rate recovery under FERC Account 182.3.

The Commission has exercised its authority to approve or deny deferred accounting in cases where utilities have met a substantial burden to justify potentially imposing a higher financial burden on consumers, beyond recovery of the costs that the Commission has determined to be just and reasonable. In previous cases, the Commission has evaluated deferred accounting proposals using various criteria, as discussed below.

Deferred accounting is special accounting treatment that is an exception to balanced and fair ratemaking. The Commission authorizes rates to allow a utility a reasonable opportunity to recover from consumers representative costs of providing utility service. Those rates remain in effect until the utility files a new rate case. Until then, utilities are not entitled to dollar-for-dollar recovery of all actual costs between rate cases; similarly, ratepayers receive no benefit when a utility reduces costs between rate cases. Instead, utilities are expected to make reasonable decisions to ensure that the funds they receive from consumers are spent prudently. Thus, normal ratemaking and allowing utilities to recover representative costs set in rate cases is the Commission's primary tool to ensure that utilities act in a prudent manner and that rates are just and reasonable, as required by Minnesota Statutes, §216B.03

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<sup>4</sup> The Federal Power Commission is the predecessor of the Federal Energy Regulatory Commission.

Deferred accounting, by contrast, allows a utility to postpone, or defer, the standard accounting treatment that would otherwise be required for the financial item or transaction in question. For example, for financial accounting purposes, a utility normally recognizes expenses as they are incurred, even if the expenses are incurred outside of a rate case test year and are not expressly included in established base rates. This approach is consistent with the ratemaking principles described above. Under deferred accounting, however, a utility would suspend the recognition of the relevant expense, record the expense in a separate deferral account (FERC Account 182.3 – *Other Regulatory Assets*), and subsequently seek recovery from ratepayers of the expense, typically over some amortization period, in a future rate case.

While an explicit statutory or rule-based test does not exist to evaluate public utility deferred accounting requests,<sup>5</sup> the Commission has previously described certain criteria and circumstances under which deferred accounting may be appropriately applied.<sup>6</sup> A prior Commission order addressing deferred accounting summarized some of these criteria and circumstances with the following statement:

Deferred accounting is a regulatory tool used primarily to hold utilities harmless when they incur out-of-test-year expenses that, because of their nature or size, should be eligible for possible rate recovery as a matter of public policy. Traditionally, deferred accounting has been reserved for costs that are unusual, unforeseeable, and large enough to have significant impact on the utility's financial condition. Deferred accounting has also sometimes been permitted when utilities have incurred sizeable expenses to meet important public policy mandates.<sup>7</sup>

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<sup>5</sup> The Commission has previously addressed its process for reviewing deferred accounting requests by stating that “While the Commission has allowed deferred accounting of manufactured-gas-plant cleanup costs in the past, these prior decisions do not bind the Commission. Rather, in each case the Commission must decide whether the specific facts and circumstances support a finding of good cause to allow cost fluctuations occurring outside of a rate-case test year to be accounted for in a future rate proceeding.” Commission’s October 17, 2018 *Order*, at 4, Docket No. G002/M-17-894, *In the Matter of the Petition of Northern States Power Company for Approval of Deferred Accounting for Manufactured-Gas-Plant Cleanup Costs*. In reference to deferred accounting decisions, the Commission has also stated that “Each decision is unique, and must be based on the particular set of facts present before the Commission.” Commission’s January 10, 2017 *Order*, Docket No. E015/M-16-648, at 5, *In the Matter of a Petition for Approval of Deferred Accounting Treatment of Costs Related to the 2016 Storm Response and Recovery*.

<sup>6</sup> Regarding its evaluation criteria for deferred accounting requests, the Commission has previously noted that “In the 1990s, the Commission permitted deferral of manufactured-gas-plant cleanup cost accounting in cases involving Minnegasco, Interstate Power Company, and Xcel. The Commission’s rationale varied from case to case, but the most important factors were that the costs involved were (1) unusual and unforeseen, (2) substantial, (3) related to utility operations, and (4) likely to provide a ratepayer benefit.” Commission’s October 17, 2018 *Order*, Docket No. G002/M-17-894, at 2, footnote 1.

<sup>7</sup> Commission’s October 17, 2018 *Order*, Docket No. G002/M-17-894, at 2.

The Department agrees with the Commission that deferred accounting treatment can be a valuable regulatory tool when applied using strict standards, and we believe that it can be useful in addressing extraordinary circumstances that call for a departure from standard accounting principles. The Department supports granting deferred accounting when a utility meets its burden of demonstrating that it has met the criteria applied by the Commission in various prior proceedings to determine whether the costs for which deferred accounting is requested are (1) unusual, unforeseeable, and/or extraordinary (2) financially significant in amount, (3) related to utility operations, and (4) likely to provide or did provide ratepayer benefit.<sup>8</sup> Using a specific set of criteria to evaluate utility requests for deferred accounting is likely to result in more consistent analyses and outcomes across time and among proceedings than evaluations that are made without considering a set of criteria. The Department is also aware of circumstances in which the Commission has approved deferred accounting for significant expenses incurred pursuant to public policy mandates,<sup>9</sup> as the Commission

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<sup>8</sup> For example, while the Commission's evaluation criteria differed among the following listed dockets, the factors of primary importance were that the relevant costs were a combination of (1) unusual, unforeseen, and/or extraordinary (2) significant or substantial in amount, (3) related to utility operations, and (4) likely to provide or did provide ratepayer benefit:

- Commission's July 16, 2012 *Order* in Docket No. E002/M-11-1263, *In the Matter of Xcel Energy's Petition for Deferred Accounting for Property Tax Costs*;
- Commission's January 10, 2017 *Order* in Docket No. E015/M-16-648 *In the Matter of a Petition for Approval of Deferred Accounting Treatment of Costs Related to the 2016 Storm Response and Recovery*;
- Commission's November 30, 2017 *Order* in Docket No. G011/M-17-409, *In the Matter of a Petition by the Minnesota Energy Resources Corporation for Approval of Farm Tap Customer-Owned Fuel Line Replacement Plan, Tariff Amendments, and Deferred Accounting*. At pages 9 – 10 of this *Order*, the Commission explained that in addition to meeting the other criteria, the relevant costs were intended to serve public policy goals and would be subject to review for reasonableness and prudence in a future rate case. The Department notes however, that the process of creating a regulatory asset through deferred accounting automatically provides for a future opportunity for regulators to review the relevant costs for reasonableness and prudence, as recovery of these deferred costs are approved through a separate proceeding, such as a general rate case.

<sup>9</sup> For example, the Commission approved deferred accounting in the following dockets for utility costs incurred pursuant to a Commission mandate:

- Commission's February 25, 2005 *Order* in Docket No. E002/M-03-1462, *In the Matter of Northern States Power Company's Petition for Approval of Deferred Accounting for Costs Incurred for the Web Tool and Time-of-Use Pilot Project*. At page 5 of this *Order* the Commission not only considered the fact that Xcel incurred costs to meet a Commission mandate, but the Commission also found that the "costs incurred were reasonable" and this was "not a case where the Company...should have foreseen [incurring these costs] in its last rate case."
- Commission's January 20, 1994 *Order* in Docket No. G011/M-91-989, *In the Matter of Peoples Natural Gas Company's Request to Establish a Tariff for Repairing and Replacing Farm-Tap Lines*. In this *Order*, deferred accounting was granted in lieu of the current cost recovery requested by the utility for costs incurred in implementing a Commission-required safety inspection program.

has previously stated, these approvals have "...generally been in cases where the Commission itself mandated the expenditure."<sup>10</sup>

In addition, because deferred accounting has the potential to increase the financial burden on consumers, beyond the levels that the Commission previously determined to be just and reasonable, any request to defer costs should be offset by any and all sources of higher revenues, tax rebates, credits or other relevant sources of funds.

The Department notes that the wording and description of the criteria used in evaluating deferred accounting requests sometimes varies among the records in previous dockets. Thus, the Department emphasizes that its analysis of the applicable criteria in the instant docket is not intended to either capture every prior iteration or one specific instance of evaluating deferred accounting requests. Instead, our objective is to present the Commission with an analysis that captures the core ideas and considerations previously used and potentially relevant to the deferred accounting decision before the Commission in the current Petition.

## 2. *Deferred Accounting for CenterPoint's Tranche I Projects*

CenterPoint's Tranche I projects were filed in response to a Commission request utility proposed investment projects that could assist in Minnesota's recovery from the economic impact of the COVID-19 pandemic. The Commission specifically sought spending that would be incremental to the Company's planned spending. The Company just recently received Commission approval of a 4.7 percent rate increase in its 2019 rate case.<sup>11</sup> CenterPoint has historically filed rate increase requests every two years, and indicates in its filing in this proceeding its plan to file a multi-year rate case in late 2021.<sup>12</sup>

As noted above, the Department supports the use of deferred accounting when spending is (1) unusual, unforeseeable, and/or extraordinary (2) financially significant in amount, (3) related to utility operations, and (4) likely to provide or did provide ratepayer benefit. Whether the spending is pursuant to a public policy mandate is also a relevant factor to contemplate when evaluating a deferred accounting request. The Department considered how each of these criteria/factors apply to the instant matter, and we provide the following corresponding discussion:

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<sup>10</sup> Commission's October 17, 2018 *Order*, Docket No. G002/M-17-894, at 5.

<sup>11</sup> *In the Matter of the Application by CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas for Authority to Increase Natural Gas Rates in Minnesota*, Order Accepting and Adopting Agreement Setting Rates, and Initiating Development of Conservation Programs for Renters, Docket No. G008/GR-19-524, March 1, 2021.

<sup>12</sup> Initial Filing, Exhibit B, Summary Tab.

- Unusual/unforeseeable/extraordinary: In this case, the projects being proposed are unusual only in their timing in that they reflect spending that was likely to be proposed at some future time. The Department does not consider these projects to be unusual/unforeseeable/ extraordinary since they are a part of normal course of business operations.
- Financially significant in amount: In total the projects may be financially significant, but not necessarily as individual projects. The Department notes that a utility’s base rates are not intended to achieve dollar-for-dollar cost recovery; instead, it is expected that a utility’s capital and non-capital expenditures would fluctuate somewhat between rate cases, resulting in a relatively balanced combination of minor under- and over-recovery. For a large utility such as CenterPoint, spending one million dollars on either the translation project or the GIS portion of the Damage Prevention Project would be well-within the range of expected expenditure fluctuation between rate cases. The accelerated pipe replacement project while sizeable financially could also be addressed in CenterPoints’s next rate case which is anticipated to be filed later this year.
- Related to utility operations: As noted in the first bullet point in this list, CenterPoint’s proposed projects are unusual only in their timing, but not in their purpose or nature. Even without the Commission solicitation for utility spending in the instant docket, the Company would still plan to pursue these projects as a part of its normal utility operations, albeit over a longer time period.
- Likely to provide ratepayer benefit: CenterPoint details the benefits of these projects including job creation, avoided gas costs, reduced greenhouse gas emissions, and improved access, equity and engagement. In addition, the Company summarized the potential residential rate impact per year for the projects. Table 1, below, summarizes the estimated residential rate impact of the projects for which the Department recommends approval.

**Table 1: Summary of Estimated Annual Average Residential Bill Impacts**

Year	Pipe Project	Workforce Training	GIS portion of Damage Prevention*	Translation	Total Est. Annual Avg. Residential Bill Impact
2022	\$1.92	--	\$0.06	--	\$1.98
2023	\$1.91	\$0.96	\$0.06	\$0.77	\$3.70
2024	\$1.86	\$0.96	\$0.06	\$0.77	\$3.65
2025	\$1.76	--	\$0.06	--	\$1.82

\* The Department recommends approval of only the GIS update portion of the Damage Prevention Project. The Company’s estimated rate impact ranged from \$0.06 to \$1.98 per year. The GIS component is the least costly component of the Project.

Pursuant to public policy mandate: On May 20, 2020, the Minnesota Public Utilities Commission (Commission) opened an *Inquiry into Utility Investments that May Assist Minnesota's Economic Recovery from the COVID-19 Pandemic*, and issued a *Notice of Reporting Required by Utilities* the Commission's (Docket No. E,G999/CI-20-492) seeking information from all rate-regulated electric and gas utilities in Minnesota on ongoing, planned or proposed investment projects that meet the following conditions:

- Provide significant utility system benefits;
- Are consistent with approved resource plans, approved natural gas distribution infrastructure or pipeline safety plans, triennial conservation plans and existing Commission orders;
- Reduce carbon or other pollutant emissions in the power sector or across energy sectors;
- Increase access to conservation and clean energy resources for Minnesotans;
- Create jobs or otherwise assist in economic recovery for Minnesotans; and
- Use woman, veteran, or minority owned businesses as much as possible and provide documentation of these efforts.

CenterPoint's Tranche I Projects were submitted in response to the Commission's directive.

The Department concludes that CenterPoint's proposals do not meet the majority of the typical criteria used to evaluate deferred accounting requests. However, if the Commission wishes to approve the projects under the public policy requirement, we recommend the Commission limit deferred accounting to the three full projects and one partial project discussed above. In addition, as discussed in the next section, the Department recommends the Commission defer its final approval of projects until a full understanding of the rate impact of the recent polar vortex on customer bills is known.

#### *D. RATE IMPACT OF THE RECENT POLAR VORTEX*

In early February, record cold weather across the middle section of the United States led to price spikes in natural gas prices. Although Minnesota was not affected by outages as experienced in Texas, natural gas price increases will ultimately pass through to Minnesota customers. Until the Commission has a full understanding of the rate impact natural gas prices resulting from the polar vortex will have on Minnesota customers, the Department recommends deferring approval on any of CenterPoint's Tranche I projects. CenterPoint customers have experienced a 4.7 percent rate increase as a result of the Company's recent rate case (Docket No. G008/GR-19-524), and are likely to see another rate case filed by the Company later this year.<sup>13</sup> Although the Company has not proposed current recovery for any of its Tranche I spending and instead proposes deferred accounting, the Department is hesitant to recommend approval of future spending projects without a fuller understanding of the rate impact of the polar vortex. Any rate increase, whether the result of the recent rate case, cold weather and higher natural gas prices, or the result of deferred recovery on Tranche I projects will impact customers already struggling under tough economic conditions. The Department recommends the Commission

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<sup>13</sup> Initial Filing, Exhibit B, Summary Tab.

defer a decision on CenterPoint's Tranche I projects until it has a full understanding of the customer rate impact of the recent polar vortex.

#### **IV. DEPARTMENT RECOMMENDATIONS**

The Department recommends that the Commission defer approval of any of CenterPoint's Tranche I projects until a full understanding of the customer rate impact of the recent polar vortex is provided.

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## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons 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  
Comments**

**Docket No. G008/M-20-889**

**Dated this 17<sup>th</sup> day of March 2021**

**/s/Sharon Ferguson**



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-889_Official Service List 20-889
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Seth	DeMerritt	Seth.DeMerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Bridget	Dockter	Bridget.Dockter@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Michelle	Dreier	mdreier@electricalassociation.com		N/A	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101  Saint Paul, MN 55114	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James C.	Erickson	jerricksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
James	Garness	james.r.garness@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Anita	Grace	anita@gracemulticultural.com	GRACE Multicultural	12959 196th LN NW  Elk River, MN 55330	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Bill	Grant	billgrant@minncap.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Dr Ste 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East  St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street  Farmington, MN 550249583	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
MJ	Horner	mj.horner@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889

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Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St  Bismarck, ND 58501	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave.  Marathon, FL 33050	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889

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Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Erica	Larson	erica.larson@centerpointenergy.com	CenterPoint Energy	505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_20-889_Official Service List 20-889
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
John	Pacheco	johnpachecojr@gmail.com		N/A	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ben	Passer	Passer@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Jose	Perez	jose@hispanicsinenergy.com		1017 L Street #719  Sacramento, CA 95814	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road  St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-889_Official Service List 20-889
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390  St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-889_Official Service List 20-889
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St  Green Bay, WI 54307	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Jamez	Staples	jstaples@renewableenergypartners.com	Renewable Energy Partners	3033 Excelsior Blvd S  Minneapolis, MN 55416	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Thomas	Tynes	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East  Washington, DC 20001	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Analeisha	Vang	avang@mpower.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-889_Official Service List 20-889