



August 8, 2025

VIA eFILING

Mr. Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2116

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

Docket No. G999/CI-21-565

REPLY COMMENTS

Dear Mr. Bull:

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits the following reply comments in response to comments filed by various parties regarding the Minnesota Public Utilities Commission's ("Commission") Notice of Comment Period ("Notice") issued May 5, 2025. In its Notice, the Commission requests comment on what actions, if any, should the Commission take to modify existing gas line extension policies for rate regulated gas utilities, and included the following topics open for comment.

If you have questions, please contact us at Emily.Suppes@centerpointenergy.com or 612-321-5363 and Seth.DeMerritt@centerpointenergy.com or 612-321-4423.

Sincerely,

/s/ Emily Suppes

Director, Regulatory

/s/ Seth DeMerritt

Manager, Regulatory & Rates

Attachments

C: Service List

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

Katie Sieben	Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

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

Docket No. G999/CI-21-565

**CENTERPOINT ENERGY'S
REPLY COMMENTS IN RESPONSE TO
THE MINNESOTA PUBLIC UTILITIES
COMMISSION'S MAY 5, 2025, NOTICE**

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits the following reply comments in response to comments filed by various parties regarding the Minnesota Public Utilities Commission's ("Commission") Notice of Comment Period ("Notice") issued May 5, 2025. In its Notice, the Commission requests comment on what actions, if any, should the Commission take to modify existing gas line extension policies for rate regulated gas utilities.

CenterPoint Energy will not address all other parties' topics from their initial responses, but that does not reflect agreement with the comments not addressed in these reply comments. CenterPoint Energy will address the following topics to add further context to the discussion;

- Energy access,
- Economic model assumptions,
- Line extension policy legislation from other states,
- Minnesota legislation, and
- New area surcharge ("NAS").

Energy access and costs

Throughout the initial comments filed by parties in this docket, a consistent theme that was discussed was the benefits the natural gas industry has for low-income customers, and the importance of having fuel choice. As stated by the Laborers' International Union of North America ("LIUNA");

"While some energy advocates contend that electric alternatives are as cost-effective or reliable as gas heat, most of the developers, home buyers and businesses with skin in the game currently disagree, and their decisions determine whether homes and businesses are built and occupied, especially in ex-urban and rural areas where line extensions have the greatest impact."¹

Housing First reaffirms this statement with the following comments of their own;

"Maintaining access to natural gas as a reliable, efficient, and cost-effective energy source is vital to ensuring design flexibility and meeting the diverse needs of homeowners. Restricting this option—before scalable alternatives are available—reduces builder responsiveness and limits consumer choice. A successful transition must be driven by innovation and economic readiness, not rigid mandates."²

Additionally, other Minnesota natural gas distribution companies such as Minnesota Energy Resources Corporation ("MERC") and Xcel Energy ("Xcel") have raised the issue of line extension policy changes on low-income customers aligning with the Company's position. Xcel further raises the question about changes to line extension policies and the increased burden that could be placed on Greater Minnesota customers.³ MERC encouraged the Commission to not take a "one-size-fits-all" approach when it comes to determining line extension policies, as there are different needs of customers across all utilities in all areas of the state.⁴

¹ Docket No. G999/CI-21-565. Initial Comments Filing by Laborers' International Union of North America ("LIUNA").

² Docket No. G999/CI-21-565. Initial Comments Filing by Housing First.

³ Docket No. G999/CI-21-565. Initial Comments Filing by Xcel Energy ("Xcel").

⁴ Docket No. G999/CI-21-565. Initial Comments Filing by Minnesota Energy Resources Corporation ("MERC").

Finally, the OAG-RUD⁵, as well as the joint comments of Fresh Energy and Minnesota Center for Environmental Advocacy (“MCEA”)⁶, expresses concern about the impact of line extension policies and state extension policies potential impacts on low-income customers; therefore, any potential changes should take those negative potential impacts into consideration.

CenterPoint Energy agrees with the premise that low-income customers need to be considered when discussing line extension policies. As stated in the Company’s own initial comments, natural gas not only is the low-cost alternative for customers in Minnesota when it comes to heating their homes, but the access customers receive to the safe and reliable option of natural gas, as well as the access to low-income Energy Conservation and Optimization (“ECO”) and Gas Affordability Programs cannot be ignored.

Xcel Energy stated in their initial comments, as the only dual-fuel utility and the largest electric utility serving Minnesota, that it is vitally important that all customers have equal access to the resource of natural gas, which can provide heat far more efficiently and cost-effectively than electricity. Conversely some responders in their initial comments, such as the American Council for an Energy-Efficient Economy (“ACEEE”) stated that a fully electric and well-insulated heat pump can deliver the lowest operating costs for Minnesotan’s which we address below.⁷

In their support of electrification, both ACEEE and Center for Energy and Environment (“CEE”)⁸ present cost comparisons between all-electric and mixed fuel homes based on building energy models of prototype homes in Minnesota. In the case of ACEEE, utility rates were applied to the ResStock dataset (based on DOE’s EnergyPlus software) published in 2024, whereas CEE used the closed-source Ekotrope software to perform similar simulations using its own field data for ASHP performance. Though CEE’s use of a black-box energy model Ekotrope provides limited opportunity for verification, the precision of EnergyPlus (used in ACEEE’s analysis) is more clearly characterized. In its technical documentation, the software’s authors quote an uncertainty in energy-use intensity and cost of 3-6%, which is on par with the ~3% difference in gas-electric cost reported by ACEEE. In ACEEE’s analysis they calculate a decrease in average annual costs of \$2,680 for customers using natural gas to \$2,591 under a winter discount time of use rate for fully electrified customers.⁹ In

⁵ Docket No. G999/CI-21-565. Initial Comments Filing by OAG-RUD.

⁶ Docket No. G999/CI-21-565. Initial Comments Filing by Fresh Energy and Minnesota Center for Environmental Advocacy (“MCEA”).

⁷ Docket No. G999/CI-21-565. Initial Comments Filing by American Council for an Energy-Efficient Economy (“ACEEE”).

⁸ Docket No. G999/CI-21-565. Initial Comments Filing by Center for Energy and Environment (“CEE”).

⁹ Docket No. G999/CI-21-565. Initial Comments Filing by ACEEE.

presenting only average annual utility bills, neither study adequately captures the total cost of ownership of heating equipment nor the wide variation in those costs across the population and efficiency class. It is important to note that ACEEE's annual bill calculation for natural gas is well over twice the amount that was calculated by CenterPoint Energy. In fact, in response to a data request from CenterPoint Energy, ACEEE supplied the natural gas rates used in their calculation, and assuming annual natural gas usage of 1,000 therms the total annual cost of natural gas comes to \$973.¹⁰ This 1,000 therm assumption is higher than the average 887 therms that an average residential customer of CenterPoint Energy uses in a year. Furthermore, it is important to note that the winter time-of-use rate is not a rate offered by all Minnesota electric utilities, nor is it completely clear if the electric rates used in this analysis contemplate the cost increases needed to support the additional generation, transmission, or distribution infrastructure necessary for the extra electricity demand and production needed to heat homes in Minnesota.

Meanwhile, the Citizens Utility Board ("CUB") referenced a June 2024 study by Synapse Energy Economics, Inc ("Study"). This Study, while concluding that full electrification is cheaper than no electrification, relies on projections well into the future, and very directly points out that "gas bills for any homes retaining gas connections grow exponentially as fewer and fewer homes are expected to bear the cost burden."¹¹ This end result will only exasperate the challenges faced by low-income customers and should be a cautionary tale of limiting line extensions and ultimately reducing natural gas customers to the detriment of low-income customers.

Additional challenges of relying on the Study is that it is full of unsubstantiated assumptions that do not have existing data to support projected market trends. For example, their leading assumption is that the gas system is losing customers and decreasing demand creating upwards pressure on gas rates. Regarding industrial usage, as stated in the report, "This pathway model projects a gradual decline in industrial gas use, on an energy basis, to about half of today's level by 2050".¹² As discussed, later in these comments, the natural gas industry continues to see growth in overall demand, and this assumption simply does not align with what the market is seeing today. Additionally, the Study states the assumption "that customer departures from the gas system would be largely clustered". While certainly convenient for a full energy source conversion, that assumption alone is disconcerting, as married with the previous assumption that industrial usage is declining but not disappearing, and that low-income household may not be able to afford to make the switch to electrification. Is the cluster transition any more likely to occur then gradual transition over scattered

¹⁰ Docket No. G999/CI-21-565. ACEEE Response to Information Request CNP-001 in Docket 21-565.

¹¹ Docket No. G999/CI-21-565. Initial Comments Filing by Citizens Utility Board ("CUB").

¹² *Id.*

locations, and if the latter is more realistic, what does that do to the energy transition cost estimate? This assumption in the Study raises further questions as to why investments in the natural gas industry prove costly, but no additional costs are anticipated in their modeling for the electric system to meet clean energy transition goals and customer load growth. If the question to be evaluated in their Study is to genuinely analyze holistic customer energy costs, narrowing in on one system instead of looking at the total potential customer costs is not realistic and concerning.

As referenced by many parties in this docket, the history of line extensions is predicated on adding additional customers which help offset the fixed costs of the natural gas system. The counter argument is the expectation is we will see a reduction in the number of customers using natural gas and natural gas use, and therefore the new customers will only add costs that will eventually be assigned to low-income customers who are unable to fully electrify. However, as discussed later in these reply comments, states which have limited line extensions legislatively have not yet recognized lower natural gas usage as a result. Furthermore, the current trends of overall natural gas usage in the United States continue to increase as discussed by the following statement; “Natural gas consumption in the United States amounted to 33.11 trillion cubic feet in 2024. This was a record high, up from 30.6 trillion cubic feet in 2020. Figures increased notably from 2018 onward.”¹³

CenterPoint Energy supports the multitude of comments regarding low-income customers and ensuring that they are aptly protected. However, the contention that low-income customers need to be protected due to declining natural gas usage is not supported by data. CenterPoint Energy specifically has seen an increase in annual weather normalized dekatherm sales from 171,665,900 in 2014 to 198,487,400 in 2024 as reported in the Company’s annual jurisdictional reports. Additionally, as stated in the OAG-RUD comments, CenterPoint Energy has seen an average annual customer growth of 10,145 from 2018-2024.¹⁴ And while the OAG-RUD calculates an increase in rate base over 40 years of \$445,000,000 discounted to 2024 dollars, which equates to about 21% of the 2024 Test Year rate base approved in Docket G008/GR-08-173, due to this customer growth. The offset to that is the 10,145 annual customers increases the customer base by 44% over that same 40-year period. Based upon the customer and sales growth that the natural gas industry continues to see, the addition of customers not only increase the customer base to spread fixed costs across, but also support the regulated utility low-income programs that are currently offered.

¹³ Statista Research Department. Consumption of natural gas in the United States from 1995 to 2024 (July 10, 2025). <https://www.statista.com/statistics/184329/energy-consumption-from-natural-gas-in-the-us-from-1995/>

¹⁴ Docket No. G999/CI-21-565. Initial Comments Filing by OAG-RUD.

Economic Model

Some commenters such as Fresh Energy and MCEA, as well as the OAG-RUD, addressed concerns about the utility's costs of adding customers to the system as well as overestimating the customers' future gas use. Specifically, the OAG-RUD recommends periodic review of the following issues regarding extension allowances¹⁵:

1. Whether the utility's free footage or service extension allowance included the majority of all new extensions with only the extremely long extensions requiring a CIAC.
2. Whether the utility's free footage or extension allowance ensures that existing customers will benefit from new customers additions to the system within a reasonable time period. Utilities should include a determination that:
 - a. The assumed revenues from the new customer include a reasonable estimate of use per customer that accounts for potential declining customer usage from energy efficiency and electrification of heating and appliances.
 - b. All costs of serving the new customer are included in the calculation.
 - c. The length of the payback period and the methodology used to calculate it are reasonable.
3. If offered, whether the utility's extension charge refund policy is appropriate.
4. Whether the utility's extension allowance should be measured in number of feet (i.e. free footage) or be based on an estimate of the customer's estimated usage (taking into account square footage, number of gas appliances, non-gas heating equipment, etc.).
5. Whether offering free footage or an extension allowance continues to be reasonable in light of current and forecasted gas-system utilization, advances in technology, state and federal policy, and risks to ratepayers of stranded assets or an overbuilt system.

In general, CenterPoint Energy appreciates the OAG-RUD's approach to their analysis. For example, CenterPoint Energy agrees with the assumption that overall throughput use per individual residential customer is continuing to decline due to advances in energy efficiency. However, there may be some discrepancies between parties on what level of energy usage per customer is decreasing. While correctly pointed out by the OAG-RUD, as well as other parties, ECO programs have been successful in reducing the overall energy needs of consumers, and that fact should be taken into account. The Company restates its position from the initial comments that although a

¹⁵ *Id.*

significant number of new customers are for new homes, there is still an equally significant number of new customers that are in existing homes, transitioning to natural gas from delivered fuels. The OAG-RUD also considers the assumption in the modeling that new customer consumption will be constant over time. The Company acknowledges that this is an additional consideration that could be evaluated.

There is no data to support the claim that there will be stranded natural gas distribution system assets. The Company challenges OAG-RUD's statement that "ratepayers could be responsible for hundreds of millions of dollars over the next forty years if line extensions continue at a similar pace as the past half decade and then become unused or under-utilized."¹⁶ It appears that in reviewing the OAG-RUD's calculations for Attachment 6 included in their initial comments, that they arbitrarily selected a 5% decrease in the number of new customers year over year, but do not provide any support of how the 5% figure is derived. It would be helpful if the OAG-RUD would explain this portion of their analysis in Supplemental Comments. Also, in the event that customers are added at the reduced rate as modeled by the OAG-RUD, that does not deter from the fact that additional customers at any level should still offset the fixed costs for the current customers of the natural gas system.

Furthermore, the calculations as supported by the OAG-RUD need to be further reviewed and confirmed as there are some concerns with the calculations regarding the exclusion of deferred federal taxes and property taxes, as well as how the return calculation was performed. Additionally, the length of the payback period to use in the extension model needs further discussion in terms of what is a reasonable payback to support existing customers. While as stated in CenterPoint Energy's initial comments, the amount of time supported by the current free footage allowances the Company uses targets three to five years, this time frame is a very conservative estimate when thinking about the life of the assets used to support the customer. With asset lives extending 40 – 50 years, a payback period of about half that could be deemed a reasonable amount of time.

Other States Line Extension Policies

Several parties such as the Citizens Utility Board ("CUB"), Department of Commerce ("Department")¹⁷, and Fresh Energy & MCEA noted that other states have moved towards limiting the extension allowances for new customers. Highlighting only a small group of states have changed directions of the 48 states which have historically had a version of line extension policies¹⁸. While these few states have imposed stricter applications of line extension policies, they seemingly have a different set of facts.

¹⁶ *Id.*

¹⁷ Docket No. G999/CI-21-565. Initial Comments Filing by Department of Commerce ("Department").

¹⁸ American Gas Association, The Current State of Natural Gas Utility Line Extension Policies (July 10, 2024), https://www.aga.org/wp-content/uploads/2024/07/The-Current-State-of-Natural-Gas-Utility-Line-Extension-Policies_FINAL.pdf

First and foremost, the few states that have enacted a change in line extension policies tend to not have the cold winters that Minnesota experiences. Secondly, Minnesota is not competing directly with these states in regard to being competitive in attracting business or having similar natural resources, industries, or economies. Thirdly, and as discussed in a later section of these Reply Comments, each of those states that have imposed stricter line extension policies, have done so with legislative guidance.

States that have enacted more restrictive line extension policies, such as California, Colorado, Oregon, and Washington, have average coldest temperatures of 46.2, 25.8, 34.0, and 33.0 respectively.¹⁹ With the exception of Colorado, the temperature profiles of the states that have restricted line extension policies do not match what the residents of Minnesota experience with an average coldest temperature of 12.4 degrees. Adopting similar line extension policies of states that don't have similar climates to Minnesota will only harm Minnesota residents and businesses from realizing the benefits of natural gas to keep residents warm, as further discussed later in these comments.

The Gas Technology Institute ("GTI") completed a case study analysis of Future Residential Energy Use Scenarios in Leading Low-Carbon Regions²⁰ for California and New York in 2018. Their research aimed to quantify energy use, environmental impact, and cost-trade-offs of potential governmental policy scenarios for residential energy use in both California and New York, specifically focusing on the role of natural gas and electricity in traditional home applications: space heating, water heating, cooking, and clothes drying. Their findings show that natural gas pathways offered appreciable carbon emissions reductions with lower costs to consumers and society – including being on par with electrification scenarios in terms of percent carbon emission decreased.

Additionally, they found all-electric homes are a much more expensive carbon abatement approach – from \$200 to over \$400/metric ton of carbon emissions reduction in California and New York, respectively. The benefit/cost ratio of all-electric homes were negative, due to the large increase in annual consumer energy costs through electrification. The economics at the time were even less favorable if electric price increases were required to finance major power generation, transmission, and distribution system upgrades. They also found that home electrification is particularly costly in colder weather regions such as New York.

In contrast, the direct use of natural gas offers several cost-effective scenarios for appreciable reductions in CO₂e emissions by (1) expanding the market penetration of mature natural gas energy efficiency equipment, (2) developing and deploying natural

¹⁹ Winter Temperature Averages for Every State.

<https://www.currentresults.com/Weather/US/average-state-temperatures-in-winter.php>

²⁰ Case Studies of Future Residential Natural Gas and Electrification Scenarios in Leading Low-Carbon Regions (June 2018). [Future-Residential-Natural-Gas-and-Electrification-in-Low-Carbon-Regions-Technical-Paper_Liss-Jun2018.pdf](#)

gas heat pumps for space and water heating, and (3) blending renewable natural gas with conventional natural gas to reduce the carbon intensity of natural gas supply.

The Company notes that there are likely incremental changes that may impact this data since its creation in 2018, but provides a brief summary of these findings to showcase that there are multiple different analyses and pathways that the nationwide energy community is exploring to continue to reduce emissions while balancing not only customer costs, but societal costs. The forward-looking analyses are drawing different conclusions between GTI and additional party positions laid out in this docket, driven in large part by the direct customer impacts still being unknown of policy changes. States making policy changes have not seen attributable impacts to date. Eliminating line extension policies that benefit customers is premature based on conflicting projections and unverified outcomes. CenterPoint Energy respectfully encourages the Commission to look at gas line extensions policy as a tool to enable access to all opportunities for cost-effective energy efficiency and carbon-emissions reductions, with the understanding that the future will likely combine together many different pathways to meet the state's energy goals.

In addition to the benefit residential customers see associated with natural gas to stay warm during the winters, Minnesota's commercial and industrial customers have many of the same benefits. This is ever so important as businesses are subject to competition between states and their overall legislative policies. For example, businesses are impacted by overall building costs as discussed in the Company's initial comments. Minnesota is currently ranked 44th out of the 50 states in terms of the Tax Foundation's State Business Tax Climate Index²¹ putting them below and at a disadvantage as compared to Iowa, Illinois, Michigan, and Wisconsin. These business cost concerns can be greater exacerbated in Greater Minnesota, where the natural gas system is not as built out as the metropolitan areas.

By limiting natural gas expansion opportunities and limiting line extension policies pushing more costs onto the new businesses in the state, business will only continue to be put at a competitive disadvantage to like businesses in neighboring states.

Minnesota Legislation

A number of commenters including CUB, Fresh Energy and MCEA, and the Department referenced the state's energy goals for GHG emissions.²² The contention of these comments is that natural gas, and the current line extension policies themselves, are in direct opposition to the state's emissions goals. Additionally, commentators have highlighted the efforts of the state and support of natural gas alternatives in the form of the Natural Gas Innovation Act ("NGIA"), as well as the continued work of utility Energy Conservation and Optimization ("ECO") program as a

²¹ Tax Foundation. 2024 State Business Tax Climate Index (October 24, 2023).
<https://taxfoundation.org/research/all/state/2024-state-business-tax-climate-index/>

²² Docket No. G999/CI-21-565.

basis for reducing access to natural gas and moving away from the current the line extension policy.

It is important to note that legislative goals themselves do not give legislative direction to move away from natural gas. Instead, natural gas utilities across the state of Minnesota have continued to be supporters and are an important component to meet the goals of the state. Minnesota utilities are able to support the states emission reduction goals by implementing innovative ideas via NGIA and ECO. Without the natural gas utilities, the state would lose an important asset to meet their goals.

Meanwhile, while CUB, Fresh Energy and MCEA, and the Department all address the states GHG emission goals, they do not address other legislative policies and goals regarding home ownership and affordable housing as addressed in the comments of Housing First. Specifically, Housing First addresses the building code requirements that every dwelling unit shall be provided with heating facilities capable of maintaining a room temperature of not less than 68 degrees Fahrenheit. As stated in Housing First's comments "dependable fuel sources like natural gas are not only a matter of comfort and cost – they are a matter of safety and code compliance in Minnesota."²³ Because of the cold climate in Minnesota, the state's building codes are designed to protect customers from the cold and keep them safe. CenterPoint Energy takes this responsibility most seriously and looks forward to continuing to provide safe and reliable heating for all Minnesotans.

CEE Recommendation for Single-family new construction Energy Conservation and Optimization ("ECO") program

CenterPoint Energy updated its programs for residential new construction in the Company's 2024-2026 ECO triennial²⁴. Most builders participate in the more comprehensive and holistic High-Efficiency Home program, but the New Home Construction Rebates program provides an opportunity for builders and customers to participate in ECO through prescriptive rebates. Starting in 2024, the Company began offering the same Efficient Fuel-Switching ("EFS") measures throughout its residential and low-income programs including the High-Efficiency Homes and the New Home Construction Rebates program serving the new construction sector. In the approved 2024-2026 ECO Triennial, EFS is subject to the same requirements as the rest of its programs, with new construction projects needing to be the Company's customer.

Although CenterPoint Energy appreciates CEE's efforts to find compromise positions for free footage allowances in their July 8th, 2025, Initial Comments in this docket, the Company does not support and has concerns with CEE's proposal to require rate-regulated natural gas utilities that offer a free footage allowance through line extension

²³ Docket No. G999/CI-21-565, Initial Comments Filing by Housing First.

²⁴ Docket No. G-008/CIP-23-95.

tariffs to file a comprehensive single-family new construction ECO program with the Department. The most concerning of the recommendations is the required installation of an air source heat pump (ASHP) in lieu of a central air conditioner to be eligible for the program. CenterPoint Energy interprets this recommendation in violation with Minnesota Statute Sec. 216B.241 Subd. 2(c)²⁵, as ECO must provide free choice for customers. The Company recognizes CEE's preference to encourage ASHP adoption, however this recommendation goes beyond building code requirements and could likely lead to customer and participant dissatisfaction. This recommendation would stray from historic practice, likely causing customer and trade ally confusion with natural gas utilities in essence banning certain electric equipment.

Additionally, the Company does not support the recommendation to remove the High-Efficiency Home requirement for the installation of natural gas appliances to be eligible for all the program's tiers of incentives. CenterPoint Energy is the only gas-only utility to provide EFS rebate measures for its customers, but it is important to note, that all CenterPoint Energy customers socialize those costs. This is a fundamental element of the program structure, dividing program participation between gas and electric utilities and preserving program cost-effectiveness between the programs based on gas or electric utility energy savings. The Company is not supportive of policy that has the potential for CenterPoint Energy customers to pay for rebate measures for resident properties that are not CenterPoint Energy customers. If a customer is not putting in natural gas appliances, they are likely not going to be a CenterPoint Energy customer, so this situation seems more appropriate for an electric utility program to provide support. The Company notes that this potential change could result in the program becoming more difficult to navigate, which could lead to lower participation in ECO programs or double counting of savings at utility customer expense.

Finally, the Company notes that CEE's requirement that homes must achieve a minimum efficiency of at least 10% energy savings is already a part of the High-Efficiency Home program. However, the Company also notes that with increasing residential energy codes and standards requirements that is a possibility that using 10% as a permanent requirement may be a barrier to program participation and contribute to program decline.

New Area Surcharge

In addition to discussion regarding line extension policies, Fresh Energy and MCEA also recommend that the Commission revisit the New Area Surcharge ("NAS") policy.²⁶ CenterPoint Energy does not support opening this topic in the Future of Gas docket.

²⁵ Minnesota Statute §216B.241. Public Utilities; Energy Conservation and Optimization.

²⁶ Docket No. G999/CI-21-565. Initial Comments Filing by MCEA.

While not overly used, CenterPoint Energy’s NAS tariff is another important tool to provide safe and reliable energy service to Greater Minnesota by working directly with these communities that come to the Company looking to expand their energy access. Greater Minnesota areas currently experience higher than average heating costs when not being served by natural gas, and for all of the reasons the Company lays out above, reevaluating this approved tariff option would further limit these communities’ opportunity to reduce their energy burden.

Topics Open for Comment

1. Should the Commission consider any modifications to how gas utilities calculate free footage allowance and other costs related to gas main and service line extensions? If so, what factors or conditions would justify changes? And how would any proposed changes affect new connecting customers and other ratepayers?

CenterPoint Energy does not recommend the Commission consider any modifications to how gas utilities calculate free footage allowance and other costs related to gas main and service line extensions.

2. If the Commission should make modifications to regulated gas utilities’ gas line extension policies, how would rules, statutes, and Commission orders justify those modifications?

The Company does not support modification to line extension policies.

3. Which proposed modifications, if any, would necessitate gas utilities to coordinate and/or consult with electric utilities in the service territory where a gas line extension is being contemplated?

The Company agrees with MERC’s sentiments, that although the Commission required coordination with electric utilities on impacts on *resource-level* options in Natural Gas Integrated Resource Plans²⁷, detailed coordination at the level of *individual* customer line extensions is not reasonable. Additionally, it is the Company’s position that customers have the right to evaluate and determine their own energy needs.

4. How should the Commission consider the results of Minnesota Energy Resource Corporation’s Line Extension Policy Study in this matter?

²⁷ Docket Nos. G008, G002, G011/23-117, and G999/21-565, Order Clarifying and Expanding Framework for Natural Gas Integrated Resource Planning, October 28, 2024, Order Point 30.

CenterPoint Energy does not take an initial position on this matter.

5. What lessons should the Commission consider from proceedings in other states related to this matter?

CenterPoint Energy continues to encourage the Commission to focus on regional, cold-weather state energy policy, if prioritizing other states proceedings related to this matter.

6. Should any distinctions be made between different customer classes when considering modifications?

The Company's current policies consider customer classes in line extension policies and supports maintaining those considerations.

7. How should the Commission consider the needs of low-income customers and other areas of equity in this matter?

CenterPoint Energy strongly supports the Commission consider the needs of low-income customers in this matter, and for this reason, does not support modifications to current line extension policies that reduce energy access.

8. Are there other issues or concerns related to this matter?

CenterPoint Energy reserves the right to address additional matters in supplemental comments, if necessary.

Conclusion

Parties that have shown opposition to current line extension policies base their positions on natural gas not being an option for home heating in the future due to their vision of how to meet the state's clean energy goals. As discussed in these reply comments, current data for actual energy usage and projected market trends support the use of the natural gas system in the long-term. Minnesota's energy future will likely look to balance the many pertinent state legislative goals, affordable housing, increasing customer energy efficiency, building out economic development and advancing climate goals.

Simply put, as stated by Xcel in the introduction of their initial comments, "It is important to allow customers, especially low-income and rural customers, to have affordable access to the resource of natural gas, which can provide heat and power more efficiently and cost-effectively than electricity in cold weather."

CERTIFICATE OF SERVICE

I, Christina Benning, certify that on Friday, August 8, 2025, I served the attached Reply Comments Filing of CenterPoint Energy in Docket No. G999/CI-21-565 to all persons at the addresses indicated on the attached service list by having the document delivered via electronic filing.

/s/ Christina Benning

Senior Regulatory Paralegal
CenterPoint Energy

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	21-565Official Service List
2	Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource		15669 WATERLOO CIR TRUCKEE CA, 96161 United States	Electronic Service		No	21-565Official Service List
3	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	21-565Official Service List
4	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
5	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	21-565Official Service List
6	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
7	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
8	Randall	Beck	rbeck3@wm.com	Waste Management Renewable Energy, L.L.C.		1021 Main St Houston TX, 77002 United States	Electronic Service		No	21-565Official Service List
9	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	21-565Official Service List
10	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	21-565Official Service List
11	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
12	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
13	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
14	Tim	Brinkman	tim.brinkman@gvtel.com	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	21-565Official Service List
15	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
16	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	21-565Official Service List
17	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	21-565Official Service List
18	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
19	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	21-565Official Service List
20	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
21	Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org			Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
22	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
23	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	21-565Official Service List
24	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	21-565Official Service List
25	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	21-565Official Service List
26	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	21-565Official Service List
27	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
28	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
29	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
30	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
31	Tom	Dicklich	tdicklich@mntrades.org	Minnesota Building & Construction Trades Council		353 W. 7th St Rm 105 Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
32	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
33	Brian	Edstrom	briane@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
34	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	21-565Official Service List
35	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	21-565Official Service List
36	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	21-565Official Service List
37	Mark	Foster	mark@housingfirstmn.org	Housing First Minnesota		2960 Centre Pointe Drive Roseville MN, 55113 United States	Electronic Service		No	21-565Official Service List
38	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	21-565Official Service List
39	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	21-565Official Service List
40	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
41	Debbie	Goettel	debbie.goettel@hennepin.us	Partnership on Waste and Energy		2785 White Bear Ave N Ste 350 Maplewood MN, 55109 United States	Electronic Service		No	21-565Official Service List
42	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
43	Laura	Haight	lhaight@pfpi.net	Partnership for Policy Integrity		POB 2513 Amherst MA, 01004 United States	Electronic Service		No	21-565Official Service List
44	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
45	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	21-565Official Service List
46	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	21-565Official Service List
47	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
48	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	21-565Official Service List
49	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
50	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-565Official Service List
51	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
52	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21-565Official Service List
53	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
54	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
55	Brendan	Jordan	bjordan@gpsid.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	21-565Official Service List
56	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	21-565Official Service List
57	D	Kalmon	dkalmon@mwmo.org	Mississippi Watershed		2522 Marshall St NE	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Management Organization		Minneapolis MN, 55418-3329 United States				Service List
58	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	21-565Official Service List
59	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
60	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	21-565Official Service List
61	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	21-565Official Service List
62	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
63	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
64	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
65	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	21-565Official Service List
66	Robert	Lems	administration@dmr-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	21-565Official Service List
67	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	21-565Official Service List
68	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
69	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-565Official Service List
70	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
71	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21-565Official Service List
72	Emily	Marshall	emarshall@ourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
73	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	21-565Official Service List
74	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
75	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	21-565Official Service List
76	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	21-565Official Service List
77	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-565Official Service List
78	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	21-565Official Service List
79	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
80	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-565Official Service List
81	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
82	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
83	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
84	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
85	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
86	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-565Official Service List
87	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
88	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	21-565Official Service List
89	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
90	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
91	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	21-565Official Service List
92	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	21-565Official Service List
93	Bret	Pence	bretpence@mnipl.org	Minnesota Interfaith Power and Light		106 Waverly Place Duluth MN, 55803 United States	Electronic Service		No	21-565Official Service List
94	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List
95	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	21-565Official Service List
96	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	21-565Official Service List
97	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
98	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	21-565Official Service List
99	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	21-565Official Service List
100	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	21-565Official Service List
101	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	21-565Official Service List
102	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
103	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-565Official Service List
104	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	21-565Official Service List
105	Patrick	Serfass	pserfass@ttcorp.com	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
106	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
107	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	21-565Official Service List
108	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	21-565Official Service List
109	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	21-565Official Service List
110	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
111	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
112	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	21-565Official Service List
113	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	21-565Official Service List
114	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
115	Mark	Spurr	mospurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
116	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
117	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List
118	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
119	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
120	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-565Official Service List
121	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	21-565Official Service List
122	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	21-565Official Service List
123	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L Street #513 Sacramento CA, 95814 United States	Electronic Service		No	21-565Official Service List
124	Nicole	Westling	nicole.westling@state.mn.us		Department of Commerce	85 7th Place E Suite 280 St Paul MN, 55001 United States	Electronic Service		No	21-565Official Service List
125	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Plymouth MN, 55441 United States				Service List
126	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	21-565Official Service List
127	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
128	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	21-565Official Service List
129	Grant	Zimmerman	gzimmerman@ampamericas.com	Amp Americas		811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States	Electronic Service		No	21-565Official Service List
130	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	21-565Official Service List
131	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List