

July 19, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Reply Comments of the Minnesota Department of Commerce
Docket Nos. G008, G002, G011/CI-23-117 and G999/CI-21-565

Dear Mr. Seuffert:

Attached are the Reply Comments of the Minnesota Department of Commerce (Department) in the matters listed above.

In a [Notice of Extended Comment Period](#) (NOC) dated May 7, 2024, the Minnesota Public Utilities Commission (Commission) requested Reply Comments on the Straw Proposals submitted by Xcel Energy, CenterPoint Energy, and Minnesota Energy Resource Corporation (collectively “Gas Utilities”) addressing filing requirements the Commission should adopt for these utilities’ natural gas integrated resource plans.

The Department addresses and provides recommendations on the Comments submitted by eight parties in addition to the Department in this proceeding, responding to the Straw Proposals submitted by the Gas Utilities, including: 1) Building Decarbonization Coalition; 2) Center for Energy and the Environment; 3) CenterPoint Energy Minnesota Gas; 4) Clean Energy Organizations¹; 5) Citizens Utility Board of Minnesota; 6) Minnesota Energy Resources Corporation; 7) the Office of the Attorney General Residential Utilities Division; and 8) Northern States Power Company doing business as Xcel Energy in the attached Reply Comments.

The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. Sydnie Lieb
Director of Regulatory Analysis

SL/JK/ar
Attachment

¹ The Clean Energy Organization includes: 1) Fresh Energy; 2) Minnesota Center for Environmental Advocacy and 3) Sierra Club.



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket Nos. G008, G002, G011/CI-23-117 and G999/CI-21-565

I. INTRODUCTION AND BACKGROUND

The Minnesota Department of Commerce (Department) appreciates the opportunity to provide reply comments regarding the Minnesota Public Utilities Commission’s Investigation (Commission, MPUC) into Gas Utility Resource Planning (Gas IRP) and the Future of Gas (FoG) dockets.

In a Notice of Comment Period (NOC) dated October 11, 2023, the Minnesota Public Utilities Commission requested comments on the scope of content for Xcel Energy, CenterPoint Energy, and Minnesota Energy Resource Corporation (MERC) natural gas resource plans.

On October 24, 2023, a Petition was filed by Brian Edstrom, Senior Regulatory Advocate, Citizens Utility Board of Minnesota.

On November 30, 2023, ten parties in addition to the Department submitted Comments in this proceeding: 1) Center for Energy and the Environment (CEE); 2) CenterPoint Energy Minnesota Gas (CenterPoint or CPE); 3) Clean Energy Organizations (CEO); 4) International Union of Operating Engineers Local 49 (IUOE); 5) Laborers’ International Union of North America (LIUNA); 6) Midwest Energy Efficiency Alliance (MEEA); 7) City of Minneapolis (Minneapolis); 8) Minnesota Energy Resources Corporation (MERC); 9) the Office of the Attorney General Residential Utilities Division (OAG-RUD) and 10) Northern States Power Company doing business as Xcel Energy (Xcel, XE).

By January 2, 2024, eleven parties in addition to the Department filed Reply Comments in this proceeding responding to the initial round of Comments: 1) Minnesota Building and Construction Trades Council; 2) CenterPoint; 3) OAG-RUD; 4) Minnesota IBEW State Council; 5) Xcel; 6) MERC; 7) CUB; 8) IUOE; 9) North Star Policy Action; 10) CEO; and 11) LIUNA.

On February 22, 2024 the Commission met to consider the matter and on March 27, 2024 the Commission issued its [Order](#) (Framework Order) establishing a framework for natural gas utility integrated resource planning.

On April 29, 2024, the Commission issued a [Notice of Comment](#) requesting the utilities file Straw Proposals for filing requirements of natural gas integrated resource plans. On May 7, 2024, the Commission filed a [Notice of Extended Comment](#) requiring these be filed by May 31, 2024, Comments on the Straw Proposals be filed by June 28, 2024, and Reply Comments filed by July 19, 2024.

On May 31, 2024, [CenterPoint](#), [Xcel](#), and [MERC](#) (collectively “Gas Utilities”) filed their Straw Proposals responding to the issues in the Notice of Comment.

On June 28, 2024, eight parties in addition to the Department submitted Comments in this proceeding responding to the Straw Proposals: 1) Building Decarbonization Coalition (BDC); 2) CEE; 3) CenterPoint; 4) CEO; 5) CUB; 6) MERC; 7) OAG-RUD; and 8) Xcel.

The Department will attempt to summarize the eight parties' Reply Comments in this section using the six topic questions listed in the Commission's May 7, 2024, NOC. Not all parties commented on all issues or the same issues. If a party is not listed under a given issue, it is to be assumed they did not provide comment on it. This list, and the Comments, will focus primarily on the non-utility commenters – BDC, CEE, CEOs, CUB, and OAG-RUD – given the focus of this round of Reply Comments were these parties' and the Department's responses to the gas utilities' Straw Proposals submitted on May 31, 2024.

II. DEPARTMENT ANALYSIS

A. WHAT, IF ANY, ADDITIONAL FILING REQUIREMENTS SHOULD THE COMMISSION ADOPT FOR NATURAL GAS INTERGRATED RESOURCE PLANS (GAS IRPs)?

1) Commission Order Point 4 – State's economy wide greenhouse gas reduction statutory goals

The Commission's Framework Order Point 4 stated: "The scope of integrated resource planning considers the State's economy-wide greenhouse gas reduction statutory goal,"² and referenced Minnesota's adoption of a goal of net-zero greenhouse gas emission by 2050.³ Xcel in its Straw Proposal proposed a decision option to use 2020 as a baseline year for greenhouse gas reduction goals⁴ consistent with Natural Gas Innovation Act (NGIA) Plans.

CEE in its Comments supported Xcel's proposed clarification to Order Point 4,⁵ and that "the Commission consider lifecycle greenhouse gas emissions through natural gas IRPs, as well as statewide greenhouse gas emissions as defined in our statutory greenhouse gas reduction goals,"⁶ consistent with Xcel's proposal. CEE also identified a second issue, that being the difference in statutory baseline years for the GHG reduction goals (2005) and the Natural Gas Innovation Act (NGIA) (2020). CEE noted that natural gas use has increased almost 14 percent since 2020. This leads to a situation where the affected Gas Utilities would need to reduce emissions by some significant amount to reach the level of actual emissions used in the 2020 baseline year. CEE didn't provide a recommendation related to this second issue.

CUB also supported Xcel's proposal in its Comments "to use full lifecycle GHG emission factors when evaluating a resource, although CUB is still considering whether those emission factors should be taken from the utilities' filed NGIA plans."⁷ Though CUB noted Minn. Stat. § 216H.02 referenced by Xcel uses

² Framework Order, Page 7.

³ Framework Order, Page 5.

⁴ Xcel Straw Proposal, Page 2.

⁵ CEE Straw Proposal Comments, Page 4.

⁶ CEE Straw Proposal Comments, Page 6.

⁷ CUB Straw Proposal Comments, Page 3.

2005, and not 2020, as a baseline year, use of any baseline will be able to measure progress toward the 2050 goal.⁸ CUB further recommended “the Commission also require utilities provide a narrative description of how their preferred plan is estimated to meet the net zero by 2050 goal, or if it is not, why it is still the preferred plan.”⁹

The CEOs in their Comments stated Xcel’s proposal is “merely... a methodology to calculate emission reductions expected from its proposal,” which “will be helpful” but the “Commission must go further in its direction to utilities.”¹⁰ The CEOs recommend the Commission require the utilities to include in their Plans “a narrative description of how the utility’s preferred plan, including the 5-year action plan, will enable the utility to serve the State’s greenhouse gas emission goals, including achieving net zero emissions by 2050.”¹¹ The Comments additionally recommend including calculations of emissions from “different possible futures, including a utility’s preferred plan,” including estimates of methane leakage.¹² The CEOs present the following Proposed Decision Options it recommends the Commission adopt:

- (1) Each integrated resource plan submitted by a gas utility must include a narrative description of how its preferred plan will support and serve Minnesota’s greenhouse-gas-emission-reduction goals.
- (2) Each integrated resource plan submitted by a gas utility must include the projected emissions that will result from its preferred plan and the other resource mixes considered. Projected emissions should include all emissions from distribution system operations and upstream emissions associated with purchased gas using recognized reporting protocols and available tools.¹³

After reviewing CEE, CUB and the CEOs suggested refinements to this topic and having discussed the different options internally, the Department:

- Continues to support Xcel’s proposed Decision Option clarifying Framework Order Point 4.
- Doesn’t have adequate information to support CUB’s proposal to use emissions factors from non-NGIA sources.
- Supports CUB and CEO’s proposals to require a narrative that discusses how a utility’s preferred plan will meet Minnesota’s current statutory emissions reductions goals.
- Supports the CEOs proposal that the gas utility provide the projected emissions from its preferred plan and other resources assuming those emissions estimates are consistent with the Commission’s approve 10-year planning horizon.

⁸ Ibid.

⁹ Cub Straw Proposal Comments, Page 4.

¹⁰ CEO Straw Proposal Comments, Page 1.

¹¹ CEO Straw Proposal Comments, Pages 1-2.

¹² CEO Straw Proposal Comments, Page 4.

¹³ CEO Straw Proposal Comments, Page 5.

The Department appreciates the detail that CEE brought to this topic. As to CEE's concern regarding the appropriate baseline year, the Department recognizes the validity of CEE's concern, but doesn't believe the topic rises to the level of requiring a change to Xcel's proposed 2020 baseline year consistent with the NGIA. The net-zero by 2050 goal will require a large amount of effort to reduce emissions no matter what the baseline year for the emissions is selected.

2) Commission Order Points 11 and 12 – Energy efficiency

These Order Points from the Framework Order require the inclusion of energy efficiency in a gas utility's IRP analysis.

In its Straw Proposal, Xcel proposed to analyze energy efficiency across three tiered scenarios – a “base case” incorporating the amount of energy efficiency included in the current Energy Conservation and Optimization (ECO) Plan; “intermediate scenarios” including “incremental cost at higher or lower spending levels and the expected impact of resulting incremental achievement” from the base case, and a “maximum scenario” initially setting a maximum spend at 100 percent of incremental capital costs.¹⁴ Xcel included a proposed decision option “To treat energy efficiency alongside all other energy resource options, utility integrated resource plans should evaluate energy efficiency achievement scenarios including expected program achievement to maximum achievement.”¹⁵ Xcel additionally proposed a decision option that “The appropriate and cost-effective level of future energy efficiency procurement shall correspond to the maximum program spending level that remains cost-effective when compared to supply-side alternatives.”¹⁶

CEE in its Comments supported Xcel's proposed decision options above,¹⁷ and additionally recommended the utilities and stakeholders in the Gas Utility Innovation Roundtable (GUIR) work together “to gather and incorporate input on the assumptions used for energy efficiency in their natural gas IRPs.”¹⁸

CUB in its Comments also supported both of Xcel's proposed decision options, but for the inclusion of “supply-side” in the second option. CUB recommended modifying Xcel proposed language “to ensure that energy efficiency is not limited to only competing against supply-side alternatives” and to read:

The appropriate and cost-effective level of future energy efficiency procurement shall correspond to the maximum program spending level that remains cost-effective when compared to ~~supply-side~~ alternatives.¹⁹

¹⁴ Xcel Straw Proposal, Page 3.

¹⁵ Ibid.

¹⁶ Xcel Straw Proposal, Page 4.

¹⁷ CEE Straw Proposal Comments, Pages 6-7.

¹⁸ CEE Straw Proposal Comments, Page 7.

¹⁹ CUB Straw Proposal Comments, Pages 6-7.

The Department continues to recommend the Commission adopt Xcel's proposed decision options. Regarding the inclusion of "supply-side," in the second of these options, the Department does not oppose CUB's proposal to remove that language.

3) *Commission Order Points 15 and 30 – Regulatory cost of carbon and methane emissions scope*

CEE in its Comments discussed the regulatory cost of carbon in relation to Order Point 15 of the Commission's Framework order requiring utilities "address risk and uncertainty of demand, availability, and price for all resource options included in resource plans, and costs to comply with any regulation of greenhouse gas emission."²⁰ As CEE noted in its Comments, the Commission has established a range of regulatory costs of carbon dioxide emissions in electric resource planning and other electric dockets, and that "ECO cost-effectiveness framework includes consideration of environmental compliance costs associated with natural gas."²¹ CEE recommended the utilities and other parties "comment on the appropriateness of applying either the regulatory cost of carbon established through Minnesota Statute §216H.06 or the natural gas environmental compliance factor applied through ECO to natural gas IRPs through reply comments to this docket."²²

The Department appreciates CEE identifying this issue. The Department has had questions regarding the appropriate manner to incorporate the costs of methane emissions in the gas IRP process and CEE's discussion helped to clarify the situation. The Department agrees that the Commission should modify the regulatory cost of carbon included in gas IRPs such that it includes the estimated regulatory cost of methane emissions. The Department notes that the regulatory cost of carbon established through Minnesota Statutes § 216H.06 is specific to electric regulatory carbon costs and is likely not appropriate for gas emissions. We therefore suggest using the natural gas environmental compliance factor applied through ECO to natural gas IRPs.

Order Point 30 of the Framework Order requires utilities to "submit an update on its most recently approved resource plan on an annual basis,"²³ which must be submitted on the anniversary of the order approving the utility's last resource plan unless otherwise approved by the Commission. Xcel in its Straw Proposal proposes "reporting methane emissions from natural gas distribution system operations in the annual gas IRP update or within the integrated resource plan during years when a plan is filed" and proposed a decision option to codify this.²⁴

In its Comments, CEE stated it "believes that it is appropriate for the Commission to provide guidance on whether and how Xcel Energy should estimate methane leakage emissions associated with its gas system and supply"²⁵ and that it will review other parties' Comments before making a recommendation on this matter.

²⁰ Framework Order, Page 7.

²¹ CEE Straw Proposal Comments, Pages 7-8.

²² CEE Straw Proposal Comments, Page 8.

²³ Framework Order, Page 10.

²⁴ Xcel Straw Proposal, Page 7.

²⁵ CEE Straw Proposal Comments, Page 17.

CUB requested in its Comments that “MERC, CenterPoint and Xcel provide an update on availability of their upstream methane emissions data in reply comments.”²⁶

The Department believes there is value in Xcel providing estimates of the methane emissions resulting from the distribution function and to the extent possible from upstream sources. These estimates will help to determine the efficiency of Xcel’s distribution function relative to methane emissions and potentially some upstream methane emissions estimates of reasonable value. The Department continues to support Xcel’s proposed decision option to use the EPA’s Mandatory Greenhouse Gas Reporting Rule for the time being until better upstream methane emissions estimates are available. The Department will review any additional information Xcel provides in its reply comments as well. Depending on the extent of that information, the Department may provide an additional recommendation or recommendations.

4) Commission Order Point 17 – Environmental externalities

Order Point 17 of the Framework Order states “Utilities should estimate the environmental externality costs of resource options.”²⁷ In their Straw Proposals, Xcel, and CenterPoint both proposed adopting the already-approved externality costs adopted by the Commission in Docket No. E-999/CI-14-643.

CEE in its Comments supported Xcel’s and CenterPoint’s recommendation, which it stated, “will ensure that natural gas utilities use up-to-date, consistent externality values in the natural gas IRP process.”²⁸

CUB in its Comments also supported the recommendation, which “will provide an adequate representation of societal impacts.”²⁹ CUB additionally requested the utilities “share additional explanation of how, and to what extent, they intend to incorporate these costs in their plan analyses.”³⁰

The CEOs in their Comments stated, “the Commission should clarify that utilities should include externalities in scenarios in the same manner that electric utilities do.”³¹ The CEOs agreed with the recommendation to utilize environmental externality values from Docket No. E-999/CI-14-643, as recommended by Xcel and CenterPoint, and additionally recommended “the Commission clarify that the NGIA equivalence factor should be used in gas IRP dockets” to better capture lifecycle emissions.³² Lastly on this topic, the CEOs recommended the Commission “provide some guidance about how those values should be incorporated into analyses.”³³ The CEOs presented the following proposed Decision Options regarding capture of externalities:

²⁶ CUB Straw Proposal Comments, Page 11.

²⁷ Framework Order, Page 8.

²⁸ CEE Straw Proposal Comments, Page 9.

²⁹ CUB Straw Proposal Comments, Page 4.

³⁰ Ibid.

³¹ CEO Straw Proposal Comments, Page 5.

³² CEO Straw Proposal Comments, Page 6.

³³ Ibid.

- (3) The Commission should require utilities to use a consistent methodology to calculate the “all-in” costs of resources to allow for an apples-to-apples comparison.
- (4) The Commission should clarify that utilities should include externalities in scenarios in the same manner that electric utilities do to the greatest extent possible.”³⁴

The Department continues to support Xcel and CenterPoint’s proposed Decision Option aligning environmental externality costs in gas IRPs with the EPA’s social cost of GHG adopted by the Commission. The benefits of administrative efficiency resulting from this approach are significant. The Department also does not oppose CUB’s proposal that utilities explain in their IRPs how these externality values were incorporated into their analyses. Regarding the CEO proposal, the Department also doesn’t oppose the inclusion of those requirements.

5) Order Point 36 - Clarification

Order Point 36 of the Commission’s Framework Order references “...the likely effect of plan implementation on **electric** rates and bills”³⁵ (emphasis added). In their Straw Proposals, both MERC³⁶ and CenterPoint³⁷ request the Commission strike “electric” from the Order Point.

In their Comments, CEE did “not oppose” striking “electric” and recommended “CenterPoint Energy and MERC work with electric utilities in their service territories to understand, to the extent possible, the electric system impacts of resource options in the natural gas IRPs.”³⁸

CUB in their Comments supported the recommendation to strike “electric.”³⁹

The Department agrees with CenterPoint and MERC’s proposed correction to Order Point 36 and recommends the Commission modify Order Point 36 by removing the word “electric.”

6) Order Point 40 – Load forecast scenarios

Order Point 40 of the Framework Order requires utilities to “prove a high, medium, and low load forecast, along with relevant assumptions, in their resource plans.”⁴⁰

CenterPoint in its Straw Proposal proposed an additional Order Point 40.a. regarding load forecasting scenarios stating: “Where the high load forecast may represent the Company’s forecast for design day

³⁴ CEO Straw Proposal Comments, Pages 6-7.

³⁵ Framework Order, Page 10.

³⁶ MERC Straw Proposal, Page 4.

³⁷ CenterPoint Straw Proposal, Page 3.

³⁸ CEE Straw Proposal Comments, Page 10.

³⁹ CUB Straw Proposal Comments, Page 11.

⁴⁰ Framework Order, Page 11.

as provided in their most recent demand entitlement filing, and sales forecast as provided in the most recent rate case.”⁴¹

CEE in its Comments stated this topic was discussed in the June 18, 2024 meeting of the Gas Utility Innovation Roundtable (GUIR) that “Stakeholders clarified with CenterPoint Energy that the load forecast referred to in Order Point 40 should be a fuel-neutral forecast of energy loads served by the natural gas utility,” and would incorporate “electricity, energy efficiency, and gaseous fuels.”⁴² Thus, CEE believes “this proposed decision option may no longer be relevant.”⁴³

OAG-RUD in its Comments recommended the Commission clarify the Order Point “to reflect that any changes to a utility’s demand entitlement or rate case forecasts approved by the Commission should be the starting point for the high-load forecast,” and proposed a modified Order Point 40.a. reading:

40.a. Where the high load forecast may represent the ~~Company’s~~ Commission-approved forecast for design day as provided in ~~their~~ the utilities’ most recent demand entitlement filing, and the Commission-approved sales forecast as provided in the utilities’ most recent rate case.”⁴⁴

As mentioned at the stakeholder meeting on July 12, 2024, the Department notes that the Commission approved sales forecasts would not be appropriate given that at times these rate case sales forecasts have resulted from Settlements.

CUB in its Comments recommended the Commission reject the proposed decision option, stating load forecasts “do not, on their own, seek to ensure reliability or explain how the utility will provide adequate supply,” that all load scenarios including high load forecast should include resources in addition to natural gas, and that demand entitlement filings may not align IRP forecasting.⁴⁵ CUB further added a recommendation to clarify Xcel’s proposed Decision Option regarding scenario and sensitivity analysis, suggesting it read as below, “to eliminate redundancy”:

In initial integrated resource plans, utilities shall, at minimum, analyze scenarios and sensitivities as specified in the March 27, 2024 Order in this docket. ~~The Commission may later order additional scenarios and sensitivities.~~⁴⁶

⁴¹ CenterPoint Straw Proposal, Page 4.

⁴² CEE Straw Proposal Comments, Page 11.

⁴³ Ibid.

⁴⁴ OAG-RUD Straw Proposal Comments, Page 3.

⁴⁵ CUB Straw Proposal Comments, Page 5.

⁴⁶ CUB Straw Proposal, Page 6.

The CEOs in their reply Comments recommended the Commission “adopt additional requirements for utility load and customer forecasting... informed by Colorado’s Gas Infrastructure Plan rules.”⁴⁷ In their Comments, they present the following proposed Decision Option:

- (5) Each integrated resource plan submitted by a gas utility must indicate how the utility load and customer forecasts incorporate, to the extent practicable, relevant external factors including, but not limited to: (1) the effect of current or enacted state and local building codes and standards; (2) building electrification, efficient fuel-switching, and energy efficiency programs or incentives offered by both the gas utility and the local electric utility or local, state, or federal entities that overlap with the utility’s gas service territory; (3) the effects of rate design and/or demand response programs; (4) changes in the utility’s line extension policies, and the associated impact on gas customer growth; and (5) the price elasticity of demand (e.g., the impact of reduced throughput and rate increases on sales and peak demand requirements and impacts of commodity prices).⁴⁸

CenterPoint also expanded on this proposed Order Point in their June 28, 2024, Straw Proposal Comments. CPE also referenced the June 18, 2024, GUIR meeting discussion, noting it “is not proposing to restrict forecasting methodologies to current rate cases or demand entitlement filings, but instead is advocating for forecasting consistency across all dockets.”⁴⁹ CenterPoint further stated it “believes using the same forecasting methodologies between [natural gas IRP and annual demand entitlement filing] dockets is workable and will provide consistent results for decision making.”⁵⁰

The Department maintains its position from its June 28, 2024, Straw Proposal Comments that the gas IRP process requires a 10-year forecast, rather than the proposed shorter-term forecast proposed by CenterPoint, and recommends the Commission not adopt CenterPoint’s proposed Order Point 40.a.⁵¹ The Department also doesn’t support OAG-RUD’s substituting the term “Commission-approved” in lieu of the word “Company’s” regarding both the forecast for design day and most recent demand entitlement filing. The Department’s reasoning for why it doesn’t support OAG-RUD’s proposed language for proposed Order Point 40.a is the same as it was for CenterPoint’s proposed language, OAG-RUD’s proposed language alter the decision option such that it considers the different planning horizons for the different proceedings. The Department does not oppose the modification to Xcel’s scenario and sensitivities analysis Decision Option presented by CUB, while finding the original proposal adequate. Regarding the CEO recommendation, it provides a significant amount of additional detail and language which neither the Gas IRP stakeholder group nor the Commission has had a chance to evaluate. The Department suggests that this information should be reviewed in the Future of Gas

⁴⁷ CEO Straw Proposal Comments, Page 7.

⁴⁸ Ibid.

⁴⁹ CenterPoint Straw Proposal Comments, Page 2.

⁵⁰ Ibid.

⁵¹ The difference in the planning horizons for the different proceedings was the basis for the Department’s recommendation that the Commission reject CenterPoint’s proposed Order Point 40.a. Department Straw Proposal Comments Pages 5-6.

docket as it seems to address two topics that are included in that proceeding, line extension policy and rate design.

7) Order Point 48 – Additional scenario and sensitivity analyses

Xcel proposed some changes to this Order Point in its Straw Proposal. The Department agreed with those changes in its Comments. CEE stated that it did not believe that the proposed clarification was necessary but did not oppose Xcel's proposed change.⁵² The Department continues to support the proposed change.

8) Order Point 50 – Five-year action plan

Part of Order Point 50 of the Commission Framework Order requires utilities' preferred plan include "a five-year action plan of the specific steps that it will take to implement that plan over the next five years."⁵³ In its Straw Proposal, Xcel proposed a decision option addressing this by requiring such a plan "include justification of need, resource mix, project scope, construction timeline, and cost estimates."⁵⁴

In its Comments, CUB stated it is supportive of Xcel's proposed decision option, and additionally recommended the utilities "be required to include a narrative discussion of equity impacts the projects may have," and in agreement with CenterPoint recommended utilization of mapping tools to identify "planned distribution system investments overlaid with data identifying disadvantaged communities" to "help focus electrification in those communities."⁵⁵

As noted above in the section discussion about meeting greenhouse gas emission reduction goals, the CEOs recommended in their Comments that utilities include in their action plans a narrative on how said plans will "enable the utility to serve the State's greenhouse gas emission reduction goals."⁵⁶

CEE in its Comments provided its support for Xcel's proposed decision option addressing five-year action planning.⁵⁷

The Department continues to support Xcel's proposed decision option as well and offers a minor clarification below to ensure utilities capture and rate payers receive all related revenues and tax offsets.

The utility's preferred five-year action plan shall include justification of need, resource mix, project scope, construction timeline, and cost estimates **with any offsetting revenues and tax benefits.**

⁵² CEE Straw Proposal Comments, page 11.

⁵³ Framework Order, Page 11.

⁵⁴ Xcel Straw Proposal, Page 5.

⁵⁵ CUB Straw Proposal Comments, Pages 2-3 and 14.

⁵⁶ CEO Straw Proposal Comments, Page 2.

⁵⁷ CEE Straw Proposal Comments, Page 11.

The Department does not oppose CUB’s recommendation to utilize mapping tools as means by which to measure equity impacts of planning decision, which each CenterPoint and Xcel referenced in separate ways in their Straw Proposals.

9) Order Points 51 Through 54 – Distribution system or expansion alternatives analysis

Order Points 51 through 54 of the Framework Order⁵⁸ address analysis of the distribution system and expansion alternatives analyses, which each of the utilities commented on in their Straw Proposals.

The Gas Utilities provided the number of planned capacity expansion projects eligible for expansion alternatives analyses exceeding various investment thresholds in their respective comments. The Department compiled these figures into the table below:

Table 1: Capacity Expansion Projects by Threshold Amount

Threshold Level	Number of Projects Above the Threshold		
	MERC ⁵⁹	Xcel ⁶⁰	CenterPoint ⁶¹
Over \$15 million	1		4
Over \$10 million	2		4
Over \$5 million	2		4
Over \$3 million	2	4	5
Over \$1 million	6	6	15

The BDC recommended the utilities “provide narrative explanations in their IRPs on how they used considerations of equity as a variable of determining selected EAA projects” and that EAA projects be chosen, in part, “using the proposed equity criteria⁶² in its comments. The BDC proposed the two following two decision options to require this:

1. For Utilities to select capacity expansion projects for expansion alternatives analysis using equity criteria and Environmental Justice Areas as defined in Minn. Stat. § 116.065, subd. 1(e) (2023).
2. For Utilities to adopt an investment threshold that allows the pool of eligible capacity expansion projects being assessed for expansion alternatives analysis to significantly exceed the 2-3 project requirement so utility staff can reasonably apply equity criteria in the selection of 2-3 projects.⁶³

⁵⁸ Framework Order, Pages 11-12.

⁵⁹ MERC Straw Proposal Comments, Page 6.

⁶⁰ Xcel Straw Proposal Comments, Page 1.

⁶¹ CenterPoint Straw Proposal Comments, Page 1.

⁶² BDC Straw Proposal Comments, Page 2.

⁶³ BDC Straw Proposal Comments, Page 3.

The CEOs in its discussion of EAAs proposed the analyses “should be further defined by prescribing a 3-step framework for the consideration of alternatives” – “preliminary screening of forecasted infrastructure investments,” assessment of “whether an alternatives project is technically viable,” and then the utility evaluating “the alternatives portfolio using a benefit-cost test, qualitative vendor criteria, and equity analysis.”⁶⁴ The CEOs provided the following recommendations relating this framework, copied below:

- (6) Utilities shall employ a cost threshold that casts a wide net of projects for consideration for alternatives analyses for initial resource plans.
- (7) For projects above the investment threshold for the expansion alternatives analysis, a utility shall provide a full alternatives evaluation or justify why the project was not selected for a full alternatives evaluation.
- (8) Each utility must include a summary of its discussions with stakeholders regarding the selection of projects for the expansion alternatives analysis.
- (9) A full alternatives evaluation, as required by Order Point 54 of the Commission’s March 27 Order, shall include non-pipeline alternatives and/or non-natural-gas alternatives; costs and benefits of those alternatives including the costs of direct investment, variable costs, and the social costs of carbon and methane for emissions due to or avoided by the alternative; a thorough and transparent explanation of the criteria used to rank or eliminate such alternatives; and an explanation of how equity was considered.
- (10) To integrate equity into alternatives analyses, utilities shall evaluate ways to overlay maps of proposed capital projects and resource acquisitions across maps of environmental justice and disadvantaged communities in the utilities’ service areas.”⁶⁵

CEE in its Comments supported Xcel and CenterPoint’s additional definition of “Capacity Expansion Project, Resource Expansion, or New Resources,” and further recommended that “the Commission establish a cost threshold for each utility that results in a pool of projects, of different sizes and types, from which to choose projects for the Expansion Alternatives Analyses.”⁶⁶

CUB wrote that it would wait to see projects among various thresholds before making a recommendation and that, once a threshold is decided, the utilities in their initial plans should “work with stakeholders” in identifying “which subset of the projects will actually undergo the complete EAA.”⁶⁷ CUB also did not oppose the definitions offered by Xcel and CenterPoint, but proposed a minor edit to an Xcel proposed decision option copied below:

⁶⁴ CEO Straw Proposal Comments, Page 9.

⁶⁵ CEO Straw Proposal Comments, Pages 9-10, 13.

⁶⁶ CEE Straw Proposal Comments, Page 14.

⁶⁷ CUB Straw Proposal Comments, Page 10.

For the purposes of the natural gas integrated resource plan ~~distribution system analysis~~ expansion alternatives analysis, infrastructure costs shall include capital costs the utility would pay to do the project.⁶⁸

Xcel in its Comments detailing its capacity expansion projects in the past five years also proposed the following decision option:

For Xcel Energy, the distribution system analysis shall include infrastructure costs related to resource expansion or new resources at or above a \$3 million threshold, adjusted for inflation. Additionally, Xcel Energy may evaluate and select projects for an Expansion Alternatives Analysis below this threshold where warranted. The resource plan shall include a discussion of the rationale for the projects selected for an Expansion Alternatives Analysis.⁶⁹

In its July 12, 2024, meeting, members of the Gas Utility Infrastructure Roundtable discussed this topic, including projects currently meeting various thresholds, the resources required to provide details on projects for EAA consideration, and potential fit for EAA among eligible projects.

The Department agrees with CEE that it would be best to recommend one common threshold for the three utilities for significant capacity expansion projects for administrative efficiency. The Department also understands the initial number of projects for each utility as detailed in Table 1 above is subject to change in future years, as the annual number of capacity projects at the different cost levels will vary, as well as that utilities' ability to provide details on these projects for stakeholders will require significant resources. For these reasons, the Department supports a threshold of the 10 projects over \$1 million most suited for an expansion alternatives analysis, with the utility providing a narrative of why each project is most suited.

Regarding the BDC's and CEO's proposed decision options, the Department does not support either of the proposals currently. While the two proposals may have merit, there has been no time to evaluate them. There also appears to be a desire to require a significant amount of analysis and detail to the Gas IRP process on the part of parties who lack experience working with the natural gas utilities through the development of a new regulatory process. The Department recommends that the Commission allow the Gas IRP process to develop and work through one iteration before adding newly minted reporting requirements or analyses.

B. THREE UTILITIES HAVE BEEN INSTRUCTED TO FILE GAS IRPS ON A STAGGERED FILING SCHEDULE. WHICH UTILITY SHOULD FILE ITS PLAN FIRST AND WHY? WHEN SHOULD THAT PLAN BE FILED? WHEN SHOULD THE OTHER UTILITIES FILE THEIR PLANS?

⁶⁸ CUB Straw Proposal Comments, Page 8.

⁶⁹ Xcel Straw Proposal Comments, Page 3.

In their Straw Proposals, each utility stated the earliest reasonable date to file their respective initial gas IRPs would be late 2026, with Xcel and CenterPoint both writing they would be able to file first.

In Comments following the Straw Proposals, CEE⁷⁰ and CUB⁷¹ both recommended Xcel file first in late 2026, CenterPoint next in late 2027, and MERC in late 2028.

MERC in its Comments did not oppose Xcel or CenterPoint filing first at the end of 2026, but stated it “believes it that it would be beneficial for there to be a two-year cadence between the filings of the Initial Gas IRPs of the first and second utility, and a one-year cadence for the third utility to file their Initial Gas IRP.”⁷² This proposal would result in Xcel or CenterPoint filing at the end of 2026, the other of these utilities at the end of 2028, and MERC in 2029. MERC proposes this would allow time to incorporate lessons learned from the first filing into the second.

The Department appreciates MERC’s concerns and desire to incorporate lessons from the first filing into subsequent filings, but believes a two-year delay is unnecessary as both utilities volunteered to file first. MERC, going third in the process, still can incorporate any lessons learned into its initial filing. For this reason, the Department continues to recommend a 2026 filing date for Xcel, followed by CenterPoint in 2027, and MERC in 2028, all using an October 1 filing date.

C. FOR XCEL ENERGY, WHAT, IF ANY, DIRECTION SHOULD THE COMMISSION GIVE REGARDING XCEL’S ANALYSIS AND REPORTING ON METHANE EMISSIONS?

The Department included Xcel in its previous discussion regarding CEE’s proposal to recognize the costs associated with future methane regulation in the regulatory cost of carbon calculation. The Department supports the selection of one of the two approach CEE identified for all the Gas Utilities filing IRPs, not just Xcel. The Department views this approach to the issue as providing the Commission with more complete information and being more equitable. The Department also supports requiring the Gas Utilities to provide the quantity of methane emissions associated with their respective distribution functions and any upstream estimates the Gas Utilities consider credible.

D. ARE THERE ANY OTHER ISSUES OR CONCERNS RELATED TO THIS MATTER?

In its Straw Proposal, MERC recommended the Commission allow utilities to utilize deferred accounting of gas IRP costs, believing it will incur “substantial expenses as a result of the implementing a Gas IRP.”⁷³

OAG-RUD in its Comments recommended the Commission reject the request, stating MERC “has not shown good cause for the Commission to grant a deferred accounting exception,”⁷⁴ that the request

⁷⁰ CEE Straw Proposal Comments, Page 15.

⁷¹ CUB Straw Proposal Comments, Pages 10-11.

⁷² MER Straw Proposal Comments, Page 3.

⁷³ MERC Straw Proposal, Page 5.

⁷⁴ OAG-RUD Straw Proposal Comments, Page 4.

“does not meet the traditional deferred accounting requirements,”⁷⁵ that “MERC does not clearly identify the public policy mandate that any alleged ‘significant costs’ would be incurred to serve,”⁷⁶ and that “MERC has not shown that it will be prevented from recovering these costs through a general rate case.”⁷⁷

CUB in its Comments also recommended the Commission reject the request, stating MERC would likely not file their gas IRP until at least late 2028, that incurrence of costs outside of rate cases alone does not warrant deferred accounting, and the Commission has previously denied requests seeking deferred accounting treatment for matters involving costs as high as \$28 million.⁷⁸ CUB added MERC provided no actual forecasted costs related to gas IRP, making the request for deferred accounting premature.⁷⁹

The Department maintains its position from its Straw Proposal Comments that the Commission reject MERC’s request that all conditionally approve projects be deemed eligible for deferred accounting.

E. HOW SHOULD EQUITY BE INCORPORATED INTO GAS RESOURCE PLANS AND THE GAS PLANNING PROCESS? CONSIDER THE UTILITY’S ABILITY TO IMPACT EQUITY IN TERMS OF:

- 1. Distribution of burdens and benefits (for example, where to build infrastructure)*
- 2. Participation in decision-making (for example, when, where, and how public meetings, listening sessions, etc. are held)*
- 3. Solutions that match how people want to live their lives (for example, matching utility programs and services to individual community needs and wants, rather than one-size-fits-all-solutions)*
- 4. Redress for previous harms (for example, considering how to locate utility jobs and affordability programs in communities that have been impacted by environmental injustices or another systemic disinvestment).*

The utilities in their Straw Proposals provided various considerations of how to address equity within their filings and the process itself.

In its Comments, the BDC addressed equity concerns as they relate to the expansion alternatives analyses, as detailed above in the EAA section.

In its Comments, the CEOs also discussed equity considerations relating to expansion alternatives analyses, referencing requirements of Colorado’s Gas Infrastructure Plans⁸⁰ and utilizing mapping tools to incorporate socioeconomic data into IRP processes as detailed by CenterPoint.⁸¹ These items are discussed above in the EAA and five-year action plan sections of the Instant Comments. The CEOs also

⁷⁵ OAG-RUD Straw Proposal Comments, Page 5.

⁷⁶ Ibid.

⁷⁷ OAG-RUD Straw Proposal Comments, Page 6.

⁷⁸ CUB Straw Proposal Comments, Page 12.

⁷⁹ CUB Straw Proposal Comments, Page 13.

⁸⁰ CEO Straw Proposal Comments, Pages 11-12.

⁸¹ CEO Straw Proposal Comments, Page 13.

recommend “the Commission should encourage utilities to focus on electrification” to “center equity in gas planning” to reduce fossil fuel emissions and improve health air quality.⁸²

CEE stated in its comments that the Commission “established foundational requirements for participatory equity” as part of its Framework Order, such as requiring public meetings on gas IRPs, ensuring the gas IRPs are publicly available, and minimizing confidential data in the plans.⁸³ CEE further added it believes “that requiring natural gas utilities to work with stakeholders through the Gas Utility Innovation Roundtable may also be helpful in ensuring equitable access to participation in the natural gas IRP process and decision-making” and recommended “GPI incorporate an equity-focused component to the Gas Utility Innovation Roundtable to inform the development of natural gas utilities’ IRPs” such as “through partnerships with outside community organizations with existing knowledge, relationships, and trust of communities.”⁸⁴

CUB in its Comments provided numerous recommendations related to equity, and how it should be incorporated into various parts of the gas IRPs including the five-year action plan and selection of projects for expansion alternatives analyses.⁸⁵ These components relating to the action plan and EAAs are discussed in their respective sections above. CUB also identified opportunities to engage workforce considerations as relates to equity concerns.⁸⁶

With respect to equity issues raised in this section and not discussed elsewhere within these Comments, the Department supports CEE’s proposal for GPI to incorporate equity into future GUIR meetings such as meetings with community and tribal partners. Such partnerships would provide valuable perspective to voice their concerns and those of their communities to help strengthen the utilities’ resource plans and processes. The Department is also supportive of incorporating equity into workforce and supplier diversification as relates to gas IRPs. Finally, the Department continues to support Xcel’s proposed decision option that “Integrated resource plans shall include a discussion of how equity was considered in the planning process.”⁸⁷

- F. *HOW DOES YOUR COMMUNITY USE NATURAL GAS IN UNIQUE WAYS THAT THE COMMISSION OR OTHER GROUPS MIGHT NOT SEE (FOR EXAMPLE, YOUR NEED FOR A PARTICULAR POWER SOURCE OR APPLIANCE)?*
- G. *BEFORE MAKING FINAL DECISIONS, HOW CAN UTILITIES BEST ENGAGE WITH COMMUNITIES TO MAKE SURE COMMUNITY NEEDS ARE CONSIDERED IN RESOURCE PLANS? HOW SHOULD UTILITIES DOCUMENT COMMUNITY FEEDBACK AS WELL AS EXPLAIN WHY COMMUNITY INPUT WAS OR WAS NOT USED IN FINAL GAS RESOURCE PLANS?*

⁸² CEO Straw Proposal Comments, Page 14.

⁸³ CEE Straw Proposal Comments, Page 18.

⁸⁴ CEE Straw Proposal Comments, Pages 18-19.

⁸⁵ CUB Straw Proposal Comments, Pages 13-14.

⁸⁶ CUB Straw Proposal, Page 15.

⁸⁷ Xcel Straw Proposal, Page 8.

The Department notes the audience for these two equity-related questions doesn't appear to have much overlap with the participants in the stakeholder group. As a result, the Department didn't review parties' positions on these two questions. The Department also didn't feel qualified to make recommendations regarding these two questions.

III. **DEPARTMENT RECOMMENDATIONS**

The Department recommends the Commission adopt the following clarifications by Order Point in the Framework Order:

- Order Point 4
 - Xcel's proposed Decision Option clarifying Framework Order point 4.
 - CUB and CEO's proposals to require a narrative that discusses how a utility's preferred plan will meet Minnesota's current statutory emissions reductions goals.
 - CEOs propose that the gas utility provide the projected emissions from its preferred plan and other resources assuming those emissions estimates are consistent with the Commission's approve 10-year planning horizon.
- Order Points 11 and 12
 - Xcel's proposed decision options for these two order points.
- Order Points 15 and 30
 - CEE's proposal to modify the regulatory cost of carbon included in gas IRPs such that it includes the estimated regulatory cost of methane emissions. This approach would favor the adoption of the ECO natural gas compliance factor CEE referenced.
 - Xcel's proposed decision option to use the EPA's Mandatory Greenhouse Gas Reporting Rule until better upstream methane emissions estimates are available.
- Order Point 17
 - Xcel and CenterPoint's proposed Decision Option aligning environmental externality costs in gas IRPs with the EPA's social cost of GHG adopted by the Commission.
- Order Point 36
 - CUB's proposal to strike "electric" from this order point.
- Order Point 48
 - Xcel's proposed decision option.
- Order Point 50
 - The Department's proposal to modify the language of Xcel's decision options as follows.
 - The utility's preferred five-year action plan shall include justification of need, resource mix, project scope, construction timeline, and cost estimates **with any offsetting revenues and tax benefits.**
- Order Points 51 through 54
 - A threshold of 10 projects over \$1 million most suited for an expansion alternatives analysis, with the utility providing a narrative of why each project is most suited.

The Department does not oppose the following clarifications by Order Point in the Framework Order:

- Order Points 11 and 12
 - CUB's proposal to remove the word "supply-side" from Xcel's proposed decision option.

- Order Point 17
 - CUB’s proposal that utilities explain in their IRPs how these externality values were incorporated into their analyses.
 - The CEO’s proposal to:
 - require utilities to use a consistent methodology to calculate the “all-in” costs of resources to allow for an apples-to-apples comparison.
 - require utilities should include externalities in scenarios in the same manner that electric utilities to the greatest extent possible.”
- Order Point 40
 - CUB’s recommendation to clarify Xcel’s proposed Decision Option regarding scenario and sensitivity analysis, suggesting it read as below, “to eliminate redundancy”.
- Order Point 50
 - CUB’s recommendation to utilize mapping tools as means by which to measure equity impacts of planning decision.
- Order Points 51 through 54
 - CUB’s proposed edits to Xcel decision option
 - For the purposes of the natural gas integrated resource plan ~~distribution system analysis~~ expansion alternatives analysis, infrastructure costs shall include capital costs the utility would pay to do the project.

The Department recommends the Commission reject the following clarifications by Order Point in the Framework Order:

- Order Point 40.a
 - CenterPoint’s proposed decision option;
 - OAG-RUD’s proposed edits to CenterPoint’s proposed decision option;
 - The CEO’s proposal to include information from Colorado Clean Heat Program.
- Order Points 51 through 54
 - BDC’s proposal
 - For Utilities to select capacity expansion projects for expansion alternatives analysis using equity criteria and Environmental Justice Areas as defined in Minn. Stat. § 116.065, subd. 1(e) (2023).
 - For Utilities to adopt an investment threshold that allows the pool of eligible capacity expansion projects being assessed for expansion alternatives analysis to significantly exceed the 2-3 project requirement so utility staff can reasonably apply equity criteria in the selection of 2-3 projects.
 - CEO’s proposal
 - Utilities shall employ a cost threshold that casts a wide net of projects for consideration for alternatives analyses for initial resource plans.

- (For projects above the investment threshold for the expansion alternatives analysis, a utility shall provide a full alternatives evaluation or justify why the project was not selected for a full alternatives evaluation.
- Each utility must include a summary of its discussions with stakeholders regarding the selection of projects for the expansion alternatives analysis.
- A full alternatives evaluation, as required by Order Point 54 of the Commission's March 27 Order, shall include non-pipeline alternatives and/or non-natural-gas alternatives; costs and benefits of those alternatives including the costs of direct investment, variable costs, and the social costs of carbon and methane for emissions due to or avoided by the alternative; a thorough and transparent explanation of the criteria used to rank or eliminate such alternatives; and an explanation of how equity was considered.
- To integrate equity into alternatives analyses, utilities shall evaluate ways to overlay maps of proposed capital projects and resource acquisitions across maps of environmental justice and disadvantaged communities in the utilities' service areas."

While the Department recognizes the BDC and CEO proposals should be reviewed, the Department doesn't believe there has been adequate time for that review in this proceeding.

The Department has no recommendation on the following proposal:

- Order Point 4
 - CUB's proposal to use emissions factors from non-NGIA sources.

The Department also continues to recommend the Commission reject MERC's request for deferred accounting the filing schedule it proposed in its comments dated June 28, 2024.

Regarding the equity-related topics including the ENOC - the Department supports CEE's proposal for GPI to incorporate equity into future GUIR meetings such as meeting with community partners. The Department is also supportive of incorporating equity into workforce and supplier diversification as relates to gas IRPs. The Department also continues to support Xcel's proposed decision option that "Integrated resource plans shall include a discussion of how equity was considered in the planning process."

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
Reply Comments**

Docket No. G008, G002, G011/CI-23-117 and G999/CI-21-565

Dated this **19th** day of **July 2024**

/s/Sharon Ferguson

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Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-565_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Alan	Muller	alan@greendel.org	Energy & Environmental Consulting	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-565_Official Service List
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David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-565_Official Service List
M. William	O'Brien	bobrien@mojaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
Ric	O'Connell	ric@gridlab.org	GridLab	2120 University Ave Berkeley, CA 94704	Electronic Service	No	OFF_SL_21-565_Official Service List
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_21-565_Official Service List
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-565_Official Service List
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Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-565_Official Service List
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Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, MN 55117	Electronic Service	No	OFF_SL_21-565_Official Service List
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_21-565_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_23-117_Official List
Jocelyn	Bremer	jocelyn.bremer@minneapolis.mn.gov	City of Minneapolis	350 S Fifth St Ste 210 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_23-117_Official List
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_23-117_Official List
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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_23-117_Official List
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Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 St. Paul, MN 55104	Electronic Service	No	OFF_SL_23-117_Official List
Seth	DeMerritt	Seth.DeMerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-117_Official List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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