



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

May 1, 2025

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

VIA ELECTRONIC FILING

**Re: In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of the 2024 Energy Conservation and Optimization Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor
Docket No. G011/M-25-46**

Dear Mr. Seuffert:

Enclosed, please find the Petition of Minnesota Energy Resources Corporation ("MERC") for Approval of the 2024 Energy Conservation and Optimization ("ECO")¹ Program Tracker Account, Demand-Side Management ("DSM") Financial Incentive, and Conservation Cost Recovery Adjustment factor. Excel versions of Attachment A, MERC's 2024 ECO Tracker and Attachment B, the Company's 2024 DSM Financial Incentive and supporting BENCOST analyses, are being filed concurrently.

The Minnesota Public Utilities Commission's October 28, 2014, Findings of Fact, Conclusions, and Order in Docket No. G011/GR-13-617 at Order Point 13 also required that MERC include, in future CIP tracker-account filings,² annual compliance filings documenting that its CIP-exempt customers have been properly identified and are being properly billed. MERC has included an update regarding ECO billing compliance in the attached report.

Copies of this filing have been served on the Minnesota Department of Commerce, Division of Energy Resources and the Minnesota Office of the Attorney General – Residential Utilities Division. A summary of this filing has been served on all parties on the attached service lists.

Please contact me at (414) 221-4208 if you have any questions regarding this filing.

Sincerely,

A handwritten signature in black ink that reads "Joylyn C. Hoffman Malueg".

Joylyn C. Hoffman Malueg
Senior Project Specialist
Minnesota Energy Resources Corporation

Enclosures
cc: Service Lists

¹ Previously referred to as the Conservation Improvement Program ("CIP").

² As noted above, CIP is now referred to as ECO.

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

Katie J. Sieben
Hwikwon Ham
Audrey Partridge
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Petition of Minnesota
Energy Resources Corporation for Approval
of the 2024 Energy Conservation and
Optimization Tracker Account, Demand-Side
Management Financial Incentive, and
Conservation Cost Recovery Adjustment
Factor

Docket No. G011/M-25-46

PETITION

INTRODUCTION

Minnesota Energy Resources Corporation (“MERC” or the “Company”) submits this Petition pursuant to the Minnesota Public Utilities Commission’s (“Commission”) January 27, 2010 Order Establishing Utility Performance Incentives for Energy Conservation and January 25, 2024 Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan issued in Docket No. E,G999/CI-08-133. In this filing, MERC seeks approval of its Energy Conservation and Optimization (“ECO”)¹ tracker account balance and a Demand-Side Management (“DSM”) financial incentive for the period January 1, 2024, through December 31, 2024. MERC is also seeking Commission approval of a proposed modified Conservation Cost Recovery Adjustment (“CCRA”) factor effective January 1, 2026. MERC has filed its ECO Status Report covering the same period in Docket No. G011/CIP-23-98.

I. Summary of Filing

A one-paragraph summary of the filing accompanies this Petition pursuant to Minn. R. 7829.1300, subp. 1.

¹ Previously referred to as Conservation Improvement Program (“CIP”).

II. Service on Other Parties

Pursuant to Minn. R. 7829.1300, subp. 2, MERC has served a copy of this petition on the Minnesota Department of Commerce, Division of Energy Resources and the Minnesota Office of the Attorney General – Residential Utilities Division. A summary of this filing has been served on all parties on the attached service list.

III. General Filing Information

Pursuant to Minn. R. 7829.1300, subp. 3, MERC provides the following information:

A. Name, Address, and Telephone Number of Filing Party

Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
(651) 322-8901

B. Name, Address, Electronic Address, and Telephone Number of Attorney for the Filing Party

Kristin M. Stastny
Taft Stettinius & Hollister LLP
2200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
KStastny@taftlaw.com
(612) 977-8656

C. Date of Filing and Proposed Effective Date

MERC is submitting this filing on May 1, 2025. MERC has calculated the new CCRA factor based on an assumed effective date of January 1, 2026, and assumed 12-month effective period.

D. Statute Controlling Schedule for Processing the Filing

Minn. Stat. § 216B.16, subd. 1, allows a utility to place a rate change into effect upon 60 days' notice to the Commission, unless the Commission otherwise orders. Minn. Stat. § 216B.16, subds. 6b-6c further allow public utilities to file rate schedules providing for annual recovery of actual conservation costs and approved incentives. Under Minn. R. 7829.0100, subp. 11, this Petition constitutes a miscellaneous filing because no determination of the

Company's general revenue requirement is necessary. Minn. R. 7829.1400, subp. 1, permits initial comments on miscellaneous filings to be made within 30 days of filing with reply comments due 10 days thereafter.

E. Signature, Electronic Address, and Title of Utility Employee Responsible for the Filing



Joylyn C. Hoffman Malueg
Senior Project Specialist
Minnesota Energy Resources Corporation
231 W. Michigan Street – P418
Milwaukee, WI 53203
Joylyn.HoffmanMalueg@wecenergygroup.com

IV. Description and Purpose of Filing

A. Background

In this Petition, MERC seeks the Commission's approval of its ECO tracker account balances as of December 31, 2024. Additionally, MERC seeks Commission approval of a DSM financial incentive for 2024 in the amount of \$998,125, excluding the costs and net benefits associated with approved low-income programs that are not cost-effective, in accordance with Minn. Stat. § 216B.241, subd. 7. MERC also seeks Commission approval of a CCRA surcharge to customers of \$0.00638 per therm, with a proposed effective date of January 1, 2026.

B. 2024 ECO Tracker Account and Activity

On May 1, 2024, MERC submitted a petition for approval of its 2023 Conservation Improvement Program/Energy Conservation and Optimization ("CIP/ECO")² tracker account activity, DSM financial incentive, and revised CCRA in Docket No. G011/M-24-46. Specifically, MERC requested that the Commission approve the Company's 2023 DSM financial incentive of \$1,494,587; approve MERC's 2023 CIP/ECO tracker activity; and approve a revised CCRA of

² The Conservation Improvement Program has been renamed the "Energy Conservation and Optimization" program in accordance with the passage of the 2021 Energy Conservation and Optimization Act.

\$0.01221 per therm to be effective January 1, 2025. The Commission approved MERC's 2023 CIP/ECO tracker activity and DSM incentive by Order dated November 8, 2024, with the revised CCRA effective January 1, 2025.³

The table below provides a summary of activities in the MERC ECO tracker account in 2024.

MERC ECO Tracker 2024 Activity	
Beginning Balance – January 1, 2024	(\$3,070,173.81)
CIP/ECO Expenses – January 1, 2024 – December 31, 2024	\$13,163,159.69
Carrying Charges – January 1, 2024 – December 31, 2024	(\$180,440.20)
DSM Financial Incentive	\$1,494,587.00
CIP/ECO Recoveries – January 1, 2024 – December 31, 2024	(\$11,356,541.08)
Ending Balance – December 31, 2024	\$50,591.60

Attachment A includes MERC's 2024 ECO tracker account activity. In accordance with MERC's agreement in Docket No. G011/M-24-46, MERC is providing Attachment A in excel format.

C. Proposed DSM Financial Incentive

1. Calculation of DSM Financial Incentive

MERC seeks Commission approval of a DSM financial incentive of \$998,125 for 2024 based on energy savings of 395,470 dekatherms, in accordance with the Commission's January 25, 2024 Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan in Docket No. E,G999/CI-08-133.⁴ Supporting documentation is provided in Attachment B.

MERC has excluded regulatory assessments in the amount of \$182,171 from the

³ *In the Matter of Minn. Energy Res. Corp. for Approval of 2023 Conservation Improvement Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor*, Docket No. G011/M-24-46, Order (Nov. 8, 2024).

⁴ *In the Matter of Commission Review of Utility Performance Incentives for Energy Conservation*, Docket No. E,G999/CI-08-133, Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan (Jan. 25, 2024).

calculation of net benefits consistent with the Commission's January 25, 2024 Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan in Docket No. E,G999/CI-08-133. Additionally, MERC has excluded the costs and benefits associated with its Low Income Weatherization and 4U2 programs in accordance with Minn. Stat. § 216B.241, subd. 7(i),⁵ as neither of these approved low-income programs is cost effective under the utility cost test, as show in the following table.

Program	Utility Cost Test Results (2024)
Low Income Weatherization	0.38
4U2	0.33

Minn. Stat. § 216B.241, subd. 7(i) provides that costs and benefits associated with any approved low-income gas or electric conservation improvement program that is not cost-effective when considering the costs and benefits to the utility may, at the discretion of the utility, be excluded from the calculation of net economic benefits for purposes of calculating the financial incentive to the utility. The energy and demand savings may, at the discretion of the utility, be applied toward the calculation of overall portfolio energy and demand savings for purposes of determining progress toward annual goals and in the financial incentive mechanism.⁶ The Commission approved MERC's 2020, 2021, 2022 and 2023 DSM financial

⁵ Minn. Stat. § 216B.241, subd. 7(i) provides:

The costs and benefits associated with any approved low-income gas or electric conservation improvement program that is not cost-effective when considering the costs and benefits to the utility may, at the discretion of the utility, be excluded from the calculation of net economic benefits for purposes of calculating the financial incentive to the utility. The energy and demand savings may, at the discretion of the utility, be applied toward the calculation of overall portfolio energy and demand savings for purposes of determining progress toward annual goals and in the financial incentive mechanism.

⁶ In accordance with Minn. Stat. § 216B.241, subd. 7(i), the savings attributable to these programs is applied toward the calculation of overall portfolio energy and demand savings for purposes of determining progress toward annual goals and in the financial incentive mechanism. As reflected in Attachment B to this filing, MERC has calculated its 2024 incentive excluding both of these low-income programs' 2024 spending and net benefits.

incentives that similarly excluded these costs and net benefits.⁷ MERC proposes to continue this practice as these programs continued to not be cost effective under the utility cost test.

MERC's requested DSM financial incentive is consistent with the incentive mechanism as approved in the Commission's Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan dated January 25, 2024 in Docket No. E,G-999/CI-08-133. The modified Shared Savings Model authorizes financial incentives for natural gas utilities that achieve energy savings of at least 0.7 percent of the utility's retail sales. For a utility that achieves energy savings equal to 0.7 percent of retail sales, the utility is awarded a share of net benefits. For each additional 0.1 percent of energy savings the utility achieves, the net benefits awarded increase by an additional 0.42 percent until the utility achieves a savings of 1.2 percent of retail sales. For savings levels of 1.2 percent and higher, the utility is awarded a share of the net benefits equal to the Net Benefits Cap of 4.00 percent. The increasing incentives under the plan encourage MERC to seek energy savings through completed customer conservation measures.

The incentive is designed to tie the financial incentive to the utility's progress towards meeting its energy savings goal. Additionally, the incentive will not exceed the net benefits created through the savings and therefore, customers receive the majority of the benefits achieved under the Company's ECO program. Specifically, the shared savings DSM incentive caps the incentive awarded at 4.00 percent of net benefits in 2024. The incentive mechanism is designed to encourage utilities to achieve cost-effective conservation.

D. Proposed CCRA

In the Company's 2008 rate case, the Commission approved a CCRA for the Company with an initial rate of \$0.0000 per therm and required the Company to file adjustment reports by

⁷ August 31, 2022 Order in Docket No. G-011/M-22-209, October 22, 2021 Order in Docket No. G-011/M-21-307, September 5, 2023 Order in Docket No. G011/M-23-183, and November 8, 2024 Order in Docket No. G011/M-24-46.

May 1 of each calendar year. The current CCRA factor of \$0.01221 was approved by the Commission by Order dated November 8, 2024, in Docket No. G-011/M-24-46, and was implemented effective January 1, 2025.

MERC's tracker balance as of January 1, 2025, is an under-recovery of \$50,591.60. The estimated MERC ECO tracker balance as of December 31, 2026, based on anticipated expense and collections via the conservation cost recovery charge ("CCRC"), is an under-collection of \$2,708,961. As a result, MERC proposes to set the CCRA factor to \$0.00638 per therm effective January 1, 2026 to collect the under-collection balance forecasted on the ECO tracker through 2026. As shown in Attachment C, setting the CCRA to \$0.00638 on January 1, 2026, is projected to collect the forecasted ECO tracker under-recovery of \$2,708,961 currently projected as of December 31, 2026. Page 2 of Attachment C provides the updated December 2026 forecasted ending balance incorporating the proposed CCRA rate.

Included as Attachment D are proposed redline changes to MERC's Tariff Sheet No. 7.02a, incorporating the proposed modified CCRA rate. The Company proposes to implement the bill message below, effective the first month the new CCRA factor takes effect, notifying customers of the change in their monthly bills:

Effective January 1, 2026, the CCRA (conservation cost recovery adjustment) has been revised to \$0.00638 per therm. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses.

The incremental bill impact of the proposed CCRA rate of \$0.00638 for an average residential customer using 834 therms is a reduction of \$4.86 annually. The table below provides an estimate of the average residential customer bill impact of the current and proposed CCRA rates.

Estimated Bill Impacts for Average Residential Customer

2024 Average Annual Usage (Therms)	2026 Proposed CCRA Surcharge Rate	Average Annual Bill Impact	Total Average Annual Bill (Excluding Gas Costs)	Average Annual Bill Impact of the CCRA Surcharge as a % of Total Bill (Excluding Gas Costs)
834	\$0.00638	\$5.32	\$421.79	1.26%

2024 Average Annual Usage (Therms)	Currently Approved 2025 CCRA Surcharge Rate	Average Annual Bill Impact	Total Average Annual Bill (Excluding Gas Costs)	Average Annual Bill Impact of the CCRA Surcharge as a % of Total Bill (Excluding Gas Costs)
834	\$0.01221	\$10.18	\$426.66	2.39%

E. Effect of Change on MERC Revenue

This Petition has no effect on MERC's revenue. The CCRA is forecasted to collect the difference between the ECO expenses actually recovered through the CCRC and the ECO tracker account balance as of January 2026 over approximately one year. In particular, as shown in Attachment C, setting the CCRA to \$0.00638 on January 1, 2026, is projected to recover the tracker balance of \$2,708,961 projected as of December 31, 2026.

F. ECO-Exempt Customer Billing Review

In its October 28, 2014, Findings of Fact, Conclusions, and Order in Docket No. G011/GR-13-617, the Commission ordered MERC to make annual compliance filings with future ECO tracker filings documenting that its ECO-exempt customers have been properly identified and are being properly billed.⁸

Since the imposition of this requirement, MERC has continued to conduct monthly reviews of a sample of customer bills, across all bill classes, to ensure proper billing of ECO program charges. MERC has also committed to review all ECO-exempt rate codes on a

⁸ *In the Matter of a Petition by Minn. Energy Res. Corp. for Auth. To Increase Nat. Gas Rates in Minn.*, Docket No. G011/GR-13-617, FINDINGS OF FACT, CONCLUSIONS, AND ORDER at 10 (Oct. 28, 2014) (requiring MERC to make annual compliance filings with future CIP tracker filings documenting that its CIP-exempt customers have been properly identified and are being properly billed; as noted above, CIP is now referred to as ECO).

quarterly basis to ensure customers who are treated as ECO-exempt have received an exemption. Based on MERC's continued review, all customers on ECO-exempt rate codes have a valid exemption on file and no additional billing issues have been identified.

CONCLUSION

MERC respectfully requests that the Commission approve its ECO tracker account balances for 2024 with an ending balance of \$50,591.60. Additionally, MERC requests that the Commission approve a 2024 DSM financial incentive of \$998,125. Finally, MERC requests approval to set the CCRA factor to \$0.00638 per therm effective January 1, 2026.

Dated: May 1, 2025

Respectfully submitted,

TAFT STETTINIUS & HOLLISTER LLP

By: /s/ Kristin M. Stastny

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Attorney for Minnesota Energy
Resources Corporation

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

Katie J. Sieben
Hwikwon Ham
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John A. Tuma

Chair
Commissioner
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In the Matter of the Petition of Minnesota
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Docket No. G011/M-25-46

SUMMARY OF FILING

Please take notice that on May 1, 2025, Minnesota Energy Resources Corporation submitted to the Minnesota Public Utilities Commission ("Commission") a Petition for Approval of its 2024 Energy Conservation and Optimization tracker account balance, 2024 Demand-Side Management financial incentive, and Conservation Cost Recovery Adjustment factor.

Please note that this filing is available through the eDockets system maintained by the Minnesota Department of Commerce ("Department") and the Commission. You can access this document by going to eDockets through the websites of the Department or the Commission or by going to the eDockets homepage at:

<https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showEdocketsSearch&showEdocket=true&userType=public>. Once on the eDockets homepage, this document can be accessed through the "Search Documents" link and by entering Docket Number 25-46.

Attachment A

2024 Energy Conservation and Optimization Program Tracker

Minnesota Energy Resources
CIP Tracker Balance Calculation
As of 12/31/2024

	PY Ending Balance	January	February	March	April	May	June	July	August	September	October	November	December	CY Total
Beginning Balance														
1. (excl. carry cost through July 2015)		(3,070,173.81)	(4,393,808.52)	(5,049,920.35)	(5,046,297.36)	(5,180,422.13)	(5,058,701.64)	(4,583,636.58)	(3,932,354.08)	(2,919,202.54)	(2,131,075.06)	(1,406,299.70)	407,069.87	(3,070,173.81)
Acquired IPL tracker balance														-
2. Expenses		418,164.81	1,097,216.32	1,466,472.60	1,161,295.33	874,569.47	970,232.25	1,036,114.64	1,391,150.94	1,187,511.25	1,232,491.33	1,079,710.39	1,248,230.36	13,163,159.69
3. Recoveries		(1,728,657.52)	(1,738,223.70)	(1,437,077.58)	(1,268,963.08)	(727,013.61)	(471,758.02)	(364,749.14)	(363,090.70)	(388,500.12)	(500,533.83)	(763,006.77)	(1,604,967.01)	(11,356,541.08)
4. Incentives												1,494,587.00		1,494,587.00
Subtotal Balance														
5. Line 1+2-3+4)		(4,380,666.52)	(5,034,815.90)	(5,020,525.33)	(5,153,965.10)	(5,032,866.26)	(4,560,227.42)	(3,912,271.09)	(2,904,293.83)	(2,120,191.41)	(1,399,117.56)	404,990.92	50,333.22	231,031.80
6. Monthly Carry Cost **		(13,142.00)	(15,104.45)	(25,772.03)	(26,457.02)	(25,835.38)	(23,409.17)	(20,082.99)	(14,908.71)	(10,883.65)	(7,182.14)	2,078.95	258.38	(180,440.20)
Ending Balance														
7 (Line 5+6)		(3,070,173.81)	(4,393,808.52)	(5,049,920.35)	(5,046,297.36)	(5,180,422.13)	(5,058,701.64)	(4,583,636.58)	(3,932,354.08)	(2,919,202.54)	(2,131,075.06)	(1,406,299.70)	407,069.87	50,591.60

Jan - Feb
 ** Carry Cost charge: 3.60%
 12 months
 0.00300000

March - Forward
 6.16% annual rate
 12 months
 0.00513333 monthly rate

Effective in August 2015, carrying charges are based on the total net tracker balance inclusive of carrying charges

Minnesota Energy Resources
 CCRC Recovery by Class (in therms)
 As of 12/31/2024

CCRC:	January	February	March	April	May	June	July	August	September	October	November	December	YTD
Gas Residential	28,765,184	27,654,908	23,221,786	19,575,028	9,814,237	4,493,781.40	3,240,046	2,988,719	3,028,257	4,188,919	9,604,477	26,868,939	163,444,281
Gas Small C&I	1,163,620	1,303,058	1,083,582	871,428	371,687	453,650.70	(234,229)	75,764	92,560	407,430	447,989	1,313,415	7,349,952
Gas Large C&I	15,841,174	16,278,278	12,975,145	11,848,393	5,976,882	3,766,374.40	2,455,963	2,010,986	2,836,629	4,574,707	6,320,712	14,670,707	99,555,949
Gas Large C&I Int.	2,907,703	2,001,186	2,003,219	1,202,034	835,049	686,538.20	668,168	588,783	538,902	978,732	1,877,831	2,442,496	16,730,641
Transport of Gas	7,808,863	9,125,313	7,933,043	8,190,741	6,885,548	6,099,010.20	5,854,146	6,265,194	6,267,991	6,294,810	6,815,531	7,430,120	84,970,309
Total Therms	56,486,544	56,362,743	47,216,775	41,687,624	23,883,403	15,499,355	11,984,094	11,929,446	12,764,337	16,444,596	25,066,539	52,725,676	372,051,131
CCRC rate *	0.02929	0.02929	0.02889	0.02889	0.02889	0.02889	0.02889	0.02889	0.02889	0.02889	0.02889	0.02889	
CCRC Recovery	\$ 1,654,490.87	\$ 1,650,864.74	\$ 1,364,092.63	\$ 1,204,355.46	\$ 689,991.50	\$ 447,776.36	\$ 346,220.46	\$ 344,641.69	\$ 368,761.69	\$ 475,084.39	\$ 724,172.31	\$ 1,523,244.79	\$ 10,793,696.89

* CCRC Final rate effective Mar 1, 2024

Minnesota Energy Resources
CCRA Recovery by Class (in therms)
As of 12/31/2024

CCRA:	January**	February	March	April	May	June	July	August	September	October	November	December	YTD
Gas Residential	28,758,205	27,651,917	23,216,539	19,569,123	9,817,161	4,470,036	3,212,628	2,964,507	3,002,421	4,165,412	9,595,186	26,867,632	163,290,766
Gas Small C&I	1,163,051	1,302,750	1,084,050	870,895	370,812	451,295	(235,504)	74,598	91,255	406,796	445,461	1,313,080	7,338,539
Gas Large C&I	15,824,086	16,279,450	12,850,212	11,850,739	5,976,658	3,765,170	2,454,565	2,009,520	2,833,918	4,573,251	6,320,491	14,670,688	99,408,747
Gas Large C&I Int.	2,907,703	2,001,186	2,003,219	1,202,032	835,049	686,527	668,154	588,772	538,891	978,732	1,877,828	2,442,496	16,730,589
Transport of Gas	7,761,075	9,125,313	7,933,043	8,189,548	6,885,548	6,099,010	5,854,145	6,265,190	6,267,987	6,294,803	6,815,531	7,430,119	84,921,311
Total Therms	56,414,120	56,360,616	47,087,063	41,682,337	23,885,228	15,472,038	11,953,988	11,902,587	12,734,471	16,418,993	25,054,496	52,724,015	371,689,952
CCRA rate *	0.00155	0.00155	0.00155	0.00155	0.00155	0.00155	0.00155	0.00155	0.00155	0.00155	0.00155	0.00155	
Diff in Open C & Calc**	(13,275.24)												
CCRA Recovery	\$ 74,166.65	\$ 87,358.95	\$ 72,984.95	\$ 64,607.62	\$ 37,022.10	\$ 23,981.66	\$ 18,528.68	\$ 18,449.01	\$ 19,738.43	\$ 25,449.44	\$ 38,834.47	\$ 81,722.22	\$ 562,844.19

CCRA = Conservation Cost Recovery Adjustment

*Rate changed 1/1/24

**Entries booked based on actual CCRA billings.

Attachment B
2024 Demand Side Management Incentive

Conservation Improvement Program (CIP)

BENEFIT COST FOR GAS CIPS -- Cost-Effectiveness Analysis

Company: **Minnesota Energy Resources**
Project: **TOTAL**

Input Data				2024	2025	2026
1) Retail Rate (\$/Dth) =		\$8.26				
Escalation Rate =	see input 1					
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =		\$0.000				
Escalation Rate =	see input 2a					
Non-Gas Fuel Units (e.g., kWh,Gallons, etc.) =	\$	-				
3) Commodity Cost (\$/Dth) =		\$4.52				
Escalation Rate =	See input 1					
4) Demand Cost (\$/Dth/Yr) =		\$140.56				
Escalation Rate =	see input 1					
5) Peak Reduction Factor =		1.00%				
6) Variable O&M (\$/Dth) =		\$0.0450				
Escalation Rate =	see input 1					
7) Non-Gas Fuel Cost (\$/Fuel Unit) =		\$0.00004				
Escalation Rate =	see input 7					
8) Non-Gas Fuel Loss Factor		8.22%				
9) Gas Environmental Damage Factor (\$/Dth) =		\$3.83				
Escalation Rate =	see Input 9					
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit)		\$0.00003				
Escalation Rate =	see input 10					
11) Participant Discount Rate =		3.94%				
12) CIP Utility Discount Rate =		5.57%				
13) Societal Discount Rate =		3.30%				
14) General Input Data Year =		2023				
15a) Project Analysis Year 1 =		2024				
15b) Project Analysis Year 2 =		2025				
15c) Project Analysis Year 3 =		2026				
16 Utility Project Costs						
16 a) Administrative & Operating Costs =		\$8,613,174		\$0	\$0	\$0
16 b) Incentive Costs =		\$4,367,815		\$0	\$0	\$0
16 c) Total Utility Project Costs =		\$12,980,989		\$0	\$0	\$0
17) Direct Participant Costs (\$/Part.) =		\$151		\$0	\$0	\$0
18) Participant Non-Energy Costs (Annual \$/Part.) =		\$0.00		\$0.00	\$0.00	\$0.00
Escalation Rate =	See input 2b			See input 2b	See input 2b	See input 2b
19) Participant Non-Energy Savings (Annual \$/Part)		\$0.00		\$0.00	\$0.00	\$0.00
Escalation Rate =	See input 2b			See input 2b	See input 2b	See input 2b
20) Project Life (Years) =		11.82		-	-	-
21) Avg. Dth/Part. Saved =		4		-	-	-
22) Avg Non-Gas Fuel Units/Part. Saved =		0 kWh		0 kWh	0 kWh	0 kWh
22a) Avg Additional Non-Gas Fuel Units/ Part. Used		0 kWh		0 kWh	0 kWh	0 kWh
23) Number of Participants =		111,494		-	-	-
24) Total Annual Dth Saved =		395,470		0	0	0
25) Incentive/Participant =		\$39		\$0	\$0	\$0
26) Environmental Compliance (% or \$/Dth)		1.40%				
27) Market Price Effects (% or \$/Dth)		0.00				
28) Other Environmental		0.00				
29) Economic and Jobs (Macroeconomic)		0.00				
30) Energy Security		0.00				
31) Energy Equity		0.00				
32) Utility Performance Incentives		\$998,125		\$0	\$0	\$0
33) Credit and Collection Costs		0.00				
34) Risk		0.00				
35) Reliability		0.00				
36) Resilience		0.00				
Cost Summary				Triennial NPV	Triennial B/C	
Utility Cost per Participant =	\$116.43	#DIV/0!	#DIV/0!	(\$22,679,872)	0.54	Ratepayer Impact Measure Test
Cost per Participant per Dth =	\$75.39	#DIV/0!	#DIV/0!			
Lifetime Energy Reduction (Dth)	5,347,162			\$12,369,994	1.88	Utility Cost Test
				\$23,174,688	1.88	Societal Test
Societal Cost per Dth	\$4.95			\$24,305,590	2.44	Participant Test
				\$35,639,869	3.55	Minnesota Test

Conservation Improvement Program (CIP)

BENEFIT COST FOR GAS CIPS -- Cost-Effectiveness Analysis

Company: **Minnesota Energy Resources**
Project: **LIW**

Input Data				2024	2025	2026
1) Retail Rate (\$/Dth) =		\$8.81				
Escalation Rate =	see input 1					
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =		\$0.000				
Escalation Rate =	see input 2a					
Non-Gas Fuel Units (e.g., kWh,Gallons, etc.) =	\$	-				
3) Commodity Cost (\$/Dth) =		\$4.52				
Escalation Rate =	See input 1					
4) Demand Cost (\$/Dth/Yr) =		\$140.56				
Escalation Rate =	see input 1					
5) Peak Reduction Factor =		1.00%				
6) Variable O&M (\$/Dth) =		\$0.0450				
Escalation Rate =	see input 1					
7) Non-Gas Fuel Cost (\$/Fuel Unit) =		\$0.00004				
Escalation Rate =	see input 7					
8) Non-Gas Fuel Loss Factor		8.22%				
9) Gas Environmental Damage Factor (\$/Dth) =		\$3.83				
Escalation Rate =	see Input 9					
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit)		\$0.00003				
Escalation Rate =	see input 10					
11) Participant Discount Rate =		3.30%				
12) CIP Utility Discount Rate =		5.57%				
13) Societal Discount Rate =		3.30%				
14) General Input Data Year =		2023				
15a) Project Analysis Year 1 =		2024				
15b) Project Analysis Year 2 =		2025				
15c) Project Analysis Year 3 =		2026				
16 Utility Project Costs						
16 a) Administrative & Operating Costs =		\$533,535		\$0	\$0	\$0
16 b) Incentive Costs =		\$0		\$0	\$0	\$0
16 c) Total Utility Project Costs =		\$533,535		\$0	\$0	\$0
17) Direct Participant Costs (\$/Part.) =		\$0		\$0	\$0	\$0
18) Participant Non-Energy Costs (Annual \$/Part.) =		\$0.00		\$0.00	\$0.00	\$0.00
Escalation Rate =	See input 2b			See input 2b	See input 2b	See input 2b
19) Participant Non-Energy Savings (Annual \$/Part)		\$0.00		\$0.00	\$0.00	\$0.00
Escalation Rate =	See input 2b			See input 2b	See input 2b	See input 2b
20) Project Life (Years) =		21.42		-	-	-
21) Avg. Dth/Part. Saved =		17		-	-	-
22) Avg Non-Gas Fuel Units/Part. Saved =		0 kWh		0 kWh	0 kWh	0 kWh
22a) Avg Additional Non-Gas Fuel Units/ Part. Used		0 kWh		0 kWh	0 kWh	0 kWh
23) Number of Participants =		121		-	-	-
24) Total Annual Dth Saved =		2,087		0	0	0
25) Incentive/Participant =		\$0		\$0	\$0	\$0
26) Environmental Compliance (% or \$/Dth)		1.40%				
27) Market Price Effects (% or \$/Dth)		0.00				
28) Other Environmental		0.00				
29) Economic and Jobs (Macroeconomic)		0.00				
30) Energy Security		0.00				
31) Energy Equity		0.00				
32) Utility Performance Incentives		\$8,345		\$0	\$0	\$0
33) Credit and Collection Costs		0.00				
34) Risk		0.00				
35) Reliability		0.00				
36) Resilience		0.00				
Cost Summary				Triennial NPV	Triennial B/C	
Utility Cost per Participant =	\$4,409.38	#DIV/0!	#DIV/0!	Ratepayer Impact Measure Test		
Cost per Participant per Dth =	\$255.64	#DIV/0!	#DIV/0!	(\$628,220)		
Lifetime Energy Reduction (Dth)	44,707			Utility Cost Test		
				(\$335,246)		
Societal Cost per Dth	\$12.12			Societal Test		
				(\$136,647)		
				Participant Test		
				\$381,127 N/A		
				Minnesota Test		
				(\$136,647)		
				0.75		

Conservation Improvement Program (CIP)

BENEFIT COST FOR GAS CIPS -- Cost-Effectiveness Analysis

Company: **Minnesota Energy Resources**
Project: **4U2**

Input Data				2024	2025	2026
1) Retail Rate (\$/Dth) =		\$8.81				
Escalation Rate =	see input 1					
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =		\$0.000				
Escalation Rate =	see input 2a					
Non-Gas Fuel Units (e.g., kWh,Gallons, etc.) =	\$	-				
3) Commodity Cost (\$/Dth) =		\$4.52				
Escalation Rate =	See input 1					
4) Demand Cost (\$/Dth/Yr) =		\$140.56				
Escalation Rate =	see input 1					
5) Peak Reduction Factor =		1.00%				
6) Variable O&M (\$/Dth) =		\$0.0450				
Escalation Rate =	see input 1					
7) Non-Gas Fuel Cost (\$/Fuel Unit) =		\$0.00004				
Escalation Rate =	see input 7					
8) Non-Gas Fuel Loss Factor		8.22%				
9) Gas Environmental Damage Factor (\$/Dth) =		\$3.83				
Escalation Rate =	see Input 9					
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit)		\$0.00003				
Escalation Rate =	see input 10					
11) Participant Discount Rate =		3.30%				
12) CIP Utility Discount Rate =		5.57%				
13) Societal Discount Rate =		3.30%				
14) General Input Data Year =		2023				
15a) Project Analysis Year 1 =		2024				
15b) Project Analysis Year 2 =		2025				
15c) Project Analysis Year 3 =		2026				
16 Utility Project Costs						
16 a) Administrative & Operating Costs =		\$1,531,518		\$0	\$0	\$0
16 b) Incentive Costs =		\$0		\$0	\$0	\$0
16 c) Total Utility Project Costs =		\$1,531,518		\$0	\$0	\$0
17) Direct Participant Costs (\$/Part.) =		\$0		\$0	\$0	\$0
18) Participant Non-Energy Costs (Annual \$/Part.) =		\$0.00		\$0.00	\$0.00	\$0.00
Escalation Rate =	See input 2b			See input 2b	See input 2b	See input 2b
19) Participant Non-Energy Savings (Annual \$/Part)		\$0.00		\$0.00	\$0.00	\$0.00
Escalation Rate =	See input 2b			See input 2b	See input 2b	See input 2b
20) Project Life (Years) =		19.32		-	-	-
21) Avg. Dth/Part. Saved =		19		-	-	-
22) Avg Non-Gas Fuel Units/Part. Saved =		0 kWh		0 kWh	0 kWh	0 kWh
22a) Avg Additional Non-Gas Fuel Units/ Part. Used		0 kWh		0 kWh	0 kWh	0 kWh
23) Number of Participants =		286		-	-	-
24) Total Annual Dth Saved =		5,570		0	0	0
25) Incentive/Participant =		\$0		\$0	\$0	\$0
26) Environmental Compliance (% or \$/Dth)		1.40%				
27) Market Price Effects (% or \$/Dth)		0.00				
28) Other Environmental		0.00				
29) Economic and Jobs (Macroeconomic)		0.00				
30) Energy Security		0.00				
31) Energy Equity		0.00				
32) Utility Performance Incentives		\$20,092		\$0	\$0	\$0
33) Credit and Collection Costs		0.00				
34) Risk		0.00				
35) Reliability		0.00				
36) Resilience		0.00				
Cost Summary				Triennial NPV	Triennial B/C	
Utility Cost per Participant =	\$5,354.96	#DIV/0!	#DIV/0!	Ratepayer Impact Measure Test	(\$1,765,260)	0.22
Cost per Participant per Dth =	\$274.95	#DIV/0!	#DIV/0!	Utility Cost Test	(\$1,041,506)	0.33
Lifetime Energy Reduction (Dth)	107,640			Societal Test	(\$566,069)	0.64
Societal Cost per Dth	\$14.41			Participant Test	\$932,195	N/A
				Minnesota Test	(\$566,069)	0.64

2024

Minnesota Energy Resources Corporation - Energy Conservation and Optimization Program Incentive

Instructions:

1.) Yellow highlighted fields must be updated by the utility

Inputs		Location:
2020 Weather-Normalized Sales (Dth)	43,373,165	
2021 Weather-Normalized Sales (Dth)	41,265,741	
2022 Weather-Normalized Sales (Dth)	46,960,567	
3-year Weather-Normalized Sales Average (Dth)	43,866,491	
1.0% Energy Savings	438,665	
Increase Energy Savings per 0.1% Increase in Achievement Level	43,866	
Approved ECO Budget	\$15,044,112	From Utility 2024-2026 CIP Filing - excludes DER Assessments (Department + NGEA)
Approved ECO Energy Savings Goal (Dth)	438,795	
Estimated Net Benefits at Energy Savings Goal	\$38,060,727	From Utility 2024-2026 CIP Filing.
Energy savings at 1.5% (Dth)	657,997	
Incentive Calibration		
Max Percent of Net Benefits Awarded	4.0%	
Max Percent of Expenditures Awarded	20.0%	
Earning Threshold	0.7%	
Achievement Level Where Net Benefits Cap Begins	1.2%	
Increase in Net Benefits Awarded Per 0.1% Increase in Achievement Level	4.2	

Actual 2024 Achievements	
Expenditures	\$10,915,936
Energy Saved (first year Dth saved)	395,470
Net Benefits Achieved	\$36,342,585
Shared Savings Incentive Results	
Achievement Level	0.90%
Percent of Net Benefits Awarded	2.7464%
Financial Incentive Award	\$998,125
Incentive/First Year Dth Saved \$	\$2.5239
Incentive/Net Benefits	2.7464%
Incentive/ECO Expenditures	9.14%

Estimated Incentive Levels by Achievement Level

Achievement Level (% of sales)	Energy Saved	Percent of Net Benefits Awarded	Estimated Net Benefits Achieved	Incentive Award	Average Incentive per unit Saved	Incremental Incentive Units Saved
0.0%	0	0.00%	\$0	\$0	\$0.000	-
0.1%	43,866	0.00%	\$3,804,948	\$0	\$0.000	\$0.000
0.2%	87,733	0.00%	\$7,609,896	\$0	\$0.000	\$0.000
0.3%	131,599	0.00%	\$11,414,844	\$0	\$0.000	\$0.000
0.4%	175,466	0.00%	\$15,219,792	\$0	\$0.000	\$0.000
0.5%	219,332	0.00%	\$19,024,740	\$0	\$0.000	\$0.000
0.6%	263,199	0.00%	\$22,829,688	\$0	\$0.000	\$0.000
0.7%	307,065	1.90%	\$26,634,636	\$506,058	\$1.648	\$11.536
0.8%	350,932	2.32%	\$30,439,584	\$706,198	\$2.012	\$4.562
0.9%	394,798	2.74%	\$34,244,532	\$938,300	\$2.377	\$5.291
1.0%	438,665	3.16%	\$38,049,481	\$1,202,364	\$2.741	\$6.020
1.1%	482,531	3.58%	\$41,854,429	\$1,498,389	\$3.105	\$6.748
1.2%	526,398	4.00%	\$45,659,377	\$1,826,375	\$3.470	\$7.477
1.3%	570,264	4.00%	\$49,464,325	\$1,978,573	\$3.470	\$3.470
1.4%	614,131	4.00%	\$53,269,273	\$2,130,771	\$3.470	\$3.470
1.5%	657,997	4.00%	\$57,074,221	\$2,282,969	\$3.470	\$3.470
1.6%	701,864	4.00%	\$60,879,169	\$2,435,167	\$3.470	\$3.470
1.7%	745,730	4.00%	\$64,684,117	\$2,587,365	\$3.470	\$3.470
1.8%	789,597	4.00%	\$68,489,065	\$2,739,563	\$3.470	\$3.470
1.9%	833,463	4.00%	\$72,294,013	\$2,891,761	\$3.470	\$3.470
2.0%	877,330	4.00%	\$76,098,961	\$3,043,958	\$3.470	\$3.470
2.1%	921,196	4.00%	\$79,903,909	\$3,196,156	\$3.470	\$3.470
2.2%	965,063	4.00%	\$83,708,857	\$3,348,354	\$3.470	\$3.470
2.3%	1,008,929	4.00%	\$87,513,805	\$3,500,552	\$3.470	\$3.470
2.4%	1,052,796	4.00%	\$91,318,753	\$3,652,750	\$3.470	\$3.470
2.5%	1,096,662	4.00%	\$95,123,701	\$3,804,948	\$3.470	\$3.470
2.6%	1,140,529	4.00%	\$98,928,649	\$3,957,146	\$3.470	\$3.470
2.7%	1,184,395	4.00%	\$102,733,597	\$4,109,344	\$3.470	\$3.470
2.8%	1,228,262	4.00%	\$106,538,545	\$4,261,542	\$3.470	\$3.470
2.9%	1,272,128	4.00%	\$110,343,494	\$4,413,740	\$3.470	\$3.470
3.0%	1,315,995	4.00%	\$114,148,442	\$4,565,938	\$3.470	\$3.470

Attachment C

Conservation Cost Recovery Adjustment Calculation

MERC
CCRA Calculation
To Be Effective January 1, 2026

Forecasted beginning balance (January 1, 2026)	\$ (2,163,425)
Forecasted Expenditures (January 2026-December 2026)*	\$ 15,047,208
2024 Incentive (to be approved in 2025)	\$ 998,125
Forecasted 2025 Incentive (based on current approved 2025)	\$ 1,207,087
Less forecasted CCRC recovery (January 2026-December 2026)	\$ 12,263,250
Projected carrying charges for 2026	\$ (116,784)
Forecasted December 2026 Balance	\$ 2,708,961
Forecasted gas sales (January 2026-December 2026) Therms	424,480,782
CCRA=\$/therm beginning January 1, 2026	\$ 0.00638

MERC

CCRA Calculation

**** REVISED to Incorporate the Proposed 2026 CCRA Surcharge ****

To Be Effective January 1, 2026

Forecasted beginning balance (January 1, 2026)	\$ (2,163,425)
Forecasted Expenditures (January 2026-December 2026)*	\$ 15,047,208
2024 Incentive (to be approved in 2025)	\$ 998,125
Forecasted 2025 Incentive (based on current approved 2025)	\$ 1,207,087
Less forecasted CCRC & CCRA recovery (January 2026-December 2026)	\$ 14,971,437
Projected carrying charges for 2026	\$ (116,784)
Forecasted December 2026 Balance	\$ 774
Forecasted gas sales (January 2026-December 2026) Therms	424,480,782
CCRA=\$/therm beginning January 1, 2026	\$ 0.00000

** Note that incorporating the proposed CCRA rate of \$0.00638, effective January 1, 2026, into the CCRA calculation should equate a \$0 Forecasted December 2026 Balance. The \$774 Forecasted December 2026 Balance shown is attributable to rounding.

Attachment D
Revised Tariff Sheets

Clean Tariff Sheets

CONSERVATION COST RECOVERY CHARGE AND ADJUSTMENT

10th Revised Sheet No. 7.02

1. Applicability of Conservation Cost Recovery Charge and Adjustment:

“Large Energy Facility,” as defined in Minn. Stat. 216B.2421 customers shall receive a monthly exemption from conservation improvement program charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Upon exemption from conservation program charges, the “Large Energy Facility” customers can no longer participate in any utility’s Conservation Improvement Program (CIP)/Energy Conservation and Optimization (ECO) Program.

“Large Customer Facility” customers that have been exempted from the Company’s CIP/ECO Program charges pursuant to Minn. Stat. 216B.241, Subd. 1a (b) shall receive a monthly exemption from CIP/ECO program charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from conservation program charges, the “Large Customer Facility” customers can no longer participate in the Company’s CIP/ECO Program.

“Commercial Gas Customers” that have been exempted from the Company’s CIP/ECO Program charges pursuant to Minn. Stat. 216B.241, Subd. 1a (c) shall receive a monthly exemption from CIP/ECO program charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from conservation program charges, the “Commercial Gas Customers” can no longer participate in the Company’s CIP/ECO Program. The Company has fewer than 600,000 natural gas customers in Minnesota, thus making the Company subject to this Minnesota Statute.

2. Determination of Conservation Cost Recovery Charge (CCRC): The CCRC is the amount included in base rates dedicated to the recovery of CIP/ECO costs as approved by the MPUC in the Company’s rate case. The CCRC factor is approved and applied on a per therm basis by dividing the test-year CIP/ECO expenses by the test-year sales volumes (net of CIP/ECO-exempt volumes). The CCRC for each rate schedule is:

All Classes MERC	\$0.02889/therm*
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3. Adjustment: There shall be included on each customer’s monthly bill a CCRA factor multiplied by the customer’s monthly billing therms for gas service before any applicable adjustments, city surcharge, or sales tax.

4. Determination of Conservation Cost Recovery Adjustment Factor (CCRA): The CCRA is calculated for each customer class by dividing the recoverable CIP/ECO costs by the projected sales volumes for a designated recovery period, excluding the sales volumes of CIP/ECO-exempt customers. The factor may be adjusted annually with approval of the Minnesota Public Utilities Commission. The CCRA for each rate schedule is:

* Effective March 1, 2024 in Docket No. G011/GR-22-504.

CONSERVATION COST RECOVERY CHARGE AND ADJUSTMENT

13th Revised Sheet No. 7.02a

All Classes MERC

\$0.00638*

*Approved effective January 1, 2026 in Docket No. G011/M-25-46

5. Exemption: For those customer accounts granted an exemption by the Commissioner of the Minnesota Department of Commerce (or successor agency) from CIP/ECO Program costs pursuant to Minnesota Statutes section 216B.241, the CCRC and CCRA shall not apply. Those customer accounts determined by the Commission to qualify as a Large Energy Facility Customers, shall receive a monthly exemption from conservation program charges pursuant to Minn. Stat. § 216B.16, subd. 6b Energy Conservation Improvement. Upon exemption from conservation program charges, the Large Energy Facility customers can no longer participate in any utility's CIP/ECO Program.

Under Minn. Stat. 216B.241, any customer account determined by the Commission of the Minnesota Department of Commerce to qualify as a large customer facility shall be exempt from CIP/ECO investment and expenditure requirements with respect to retail revenues attributable to the large customer facility. Customer accounts granted exemption by a decision of the Commissioner after the beginning of the calendar year shall be credited for any CIP/ECO collections billed after January first of the year following the Commissioner's decision. Upon exemption from the conservation program charges, no exempt customer facility may participate in a utility CIP/ECO Program unless the owner of the facility submits a filing with the Commissioner to withdraw its exemption.

Under Minn. Stat. 216B.241, any customer account that is not a large customer facility and that purchases or acquires natural gas from a public utility having fewer than 600,000 natural gas customers in Minnesota shall, upon a determination by the Commissioner of the Department of Commerce as qualifying for an opt out of the CIP/ECO Program, be exempt from CIP/ECO investment and expenditure requirements with respect to retail revenues attributable to the commercial gas customers. Customer accounts granted exemption by a decision of the Commissioner after the beginning of the calendar year shall be credited for any CIP/ECO collections billed after January first of the year following the Commissioner's decision. Upon exemption from conservation program charges, the customers can no longer participate in any utility's energy CIP/ECO Program unless the customer submits a filing with the Commissioner to withdraw its exemption.

6. Accounting Requirements: The Company is required to record all costs associated with the conservation program in a CIP/ECO Tracker Account. All revenues recovered through the CCRA are booked to the Tracker as an offset to expenses.

Redlined Tariff Sheets

CONSERVATION COST RECOVERY CHARGE AND ADJUSTMENT

910th Revised Sheet No. 7.02

1. Applicability of Conservation Cost Recovery Charge and Adjustment:

“Large Energy Facility,” as defined in Minn. Stat. 216B.2421 customers shall receive a monthly exemption from conservation improvement program charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Upon exemption from conservation program charges, the “Large Energy Facility” customers can no longer participate in any utility’s ~~Energy Conservation Improvement Program (CIP)/Energy Conservation and Optimization (ECO) Program.~~

“Large Customer Facility” customers that have been exempted from the Company’s ~~CIP/ECO Conservation Improvement~~ Program charges pursuant to Minn. Stat. 216B.241, Subd. 1a (b) shall receive a monthly exemption from ~~CIP/ECO conservation improvement~~ program charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from conservation program charges, the “Large Customer Facility” customers can no longer participate in the Company’s ~~Energy CIP/ECO Program Conservation Improvement Program.~~

“Commercial Gas Customers” that have been exempted from the Company’s ~~CIP/ECO Conservation Improvement~~ Program charges pursuant to Minn. Stat. 216B.241, Subd. 1a (c) shall receive a monthly exemption from ~~CIP/ECO conservation improvement~~ program charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from conservation program charges, the “Commercial Gas Customers” can no longer participate in the Company’s ~~Energy CIP/ECO Program Conservation Improvement Program.~~ The Company has fewer than 600,000 natural gas customers in Minnesota, thus making the Company subject to this Minnesota Statute.

2. Determination of Conservation Cost Recovery Charge (CCRC): The CCRC is the amount included in base rates dedicated to the recovery of CIP/~~ECO~~ costs as approved by the MPUC in the Company’s rate case. The CCRC factor is approved and applied on a per therm basis by ~~dividing the test-year CIP/ECO expenses by the test-year sales volumes (net of CIP/ECO-exempt volumes).~~ The CCRC for each rate schedule is:

All Classes MERC	\$0.02889/therm*
------------------	------------------

3. Adjustment: There shall be included on each customer’s monthly bill a CCRA factor multiplied by the customer’s monthly billing therms for gas service before any applicable adjustments, city surcharge, or sales tax.

4. Determination of Conservation Cost Recovery Adjustment Factor (CCRA): The CCRA is calculated for each customer class by dividing the recoverable CIP/~~ECO~~ costs by the projected sales volumes for a designated recovery period, excluding the sales volumes of CIP/~~ECO~~-exempt customers. The factor may be adjusted annually with approval of the Minnesota Public Utilities Commission. The CCRA for each rate schedule is:

CONSERVATION COST RECOVERY CHARGE AND ADJUSTMENT

910th Revised Sheet No. 7.02

* Effective March 1, 2024 in Docket No. G011/GR-22-504.

Date Filed: ~~May 1, 2025~~November 22, 2023
Effective Date: ~~January 1, 2026~~March 1, 2024
Docket No.: G011/~~GR-22-504~~M-25-46

Submitted By: Theodore Eidukas
Vice President –Regulatory Affairs

_____Proposed

CONSERVATION COST RECOVERY CHARGE AND ADJUSTMENT

~~12~~13th Revised Sheet No. 7.02a

All Classes MERC

\$0.~~006380~~~~1221~~*

*Approved effective January 1, 202~~6~~5 in Docket No. G011/M-~~25~~4-46

5. Exemption: For those customer accounts granted an exemption by the Commissioner of the Minnesota Department of Commerce (or successor agency) from CIP/ECO Program~~Conservation Improvement Program (CIP)~~ costs pursuant to Minnesota Statutes section 216B.241, the CCRC and CCRA shall not apply. Those customer accounts determined by the Commission to qualify as a Large Energy Facility Customers, shall receive a monthly exemption from conservation program charges pursuant to Minn. Stat. § 216B.16, subd. 6b Energy Conservation Improvement. Upon exemption from conservation program charges, the Large Energy Facility customers can no longer participate in any utility's energy-CIP/ECO Program~~Conservation Improvement Program~~.

Under Minn. Stat. 216B.241, any customer account determined by the Commission of the Minnesota Department of Commerce to qualify as a large customer facility shall be exempt from CIP/ECO investment and expenditure requirements with respect to retail revenues attributable to the large customer facility. Customer accounts granted exemption by a decision of the Commissioner after the beginning of the calendar year shall be credited for any CIP/ECO collections billed after January first of the year following the Commissioner's decision. Upon exemption from the conservation program charges, no exempt customer facility may participate in a utility CIP/ECO Program~~conservation improvement program~~ unless the owner of the facility submits a filing with the Commissioner to withdraw its exemption.

Under Minn. Stat. 216B.241, any customer account that is not a large customer facility and that purchases or acquires natural gas from a public utility having fewer than 600,000 natural gas customers in Minnesota shall, upon a determination by the Commissioner of the Department of Commerce as qualifying for an opt out of the CIP/ECO Program~~Conservation Improvement Program~~, be exempt from CIP/ECO investment and expenditure requirements with respect to retail revenues attributable to the commercial gas customers. Customer accounts granted exemption by a decision of the Commissioner after the beginning of the calendar year shall be credited for any CIP/ECO collections billed after January first of the year following the Commissioner's decision. Upon exemption from conservation program charges, the customers can no longer participate in any utility's energy CIP/ECO Program~~Conservation Improvement Program~~ unless the customer submits a filing with the Commissioner to withdraw its exemption.

6. Accounting Requirements: The Company is required to record all costs associated with the conservation program in a CIP/ECO Tracker Account. All revenues recovered through the CCRA are booked to the Tracker as an offset to expenses.

Date Filed: ~~November 13, 2024~~May 1, 2025

Effective Date: January 1, 202~~6~~5

Docket No.: G011/M-~~25~~24-46

Submitted By: Theodore Eidukas

Vice President –Regulatory Affairs

_____ Proposed

**In the Matter of the Petition of Minnesota Energy
Resources Corporation for Approval of the 2024
Energy Conservation and Optimization Program
Tracker Account, Demand-Side Management
Financial Incentive, and Conservation Cost Recovery
Adjustment Factor**

Docket No. G011/M-25-46

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 1st day of May, 2025, on behalf of Minnesota Energy Resources Corporation (MERC) I electronically filed a true and correct copy of the enclosed Petition on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 1st day of May, 2025.

/s/ Kristin M. Stastny

Kristin M. Stastny

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	M-25-46
2	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-46
3	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-46
4	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-46
5	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-46
6	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-46
7	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-46
8	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	M-25-46
9	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-46
10	Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce		400 Robert St N Ste 1500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-46

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
11	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	M-25-46
12	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	M-25-46
13	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	M-25-46
14	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	M-25-46
15	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	M-25-46
16	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	M-25-46
17	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
18	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-46
19	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-46
20	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-46
21	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-46

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
22	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	M-25-46
23	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	M-25-46
24	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
25	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-46
26	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	M-25-46
27	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-46
28	Martin	Lepak	martin.lepak@aeoa.org	Arrowhead Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	M-25-46
29	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	M-25-46
30	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	M-25-46
31	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	M-25-46
32	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-46
33	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
34	Carl	Nelson	cnelson@mncee.org	Center for Energy and		212 3rd Ave N Ste 560	Electronic Service		No	M-25-46

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Environment		Minneapolis MN, 55401 United States				
35	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	M-25-46
36	Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy Minnesota Gas		212 3rd Ave. N. Suite 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-46
37	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-46
38	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	M-25-46
39	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	M-25-46
40	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	M-25-46
41	Jean	Schafer	jeans@bepec.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	M-25-46
42	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-46
43	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	M-25-46
44	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102	Electronic Service		No	M-25-46

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
45	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-46
46	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	M-25-46
47	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-46
48	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
49	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
50	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	M-25-46
51	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
52	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-46

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1	Julie	Ambach	juliea@cmmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
2	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
3	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
4	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
5	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
6	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
7	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
8	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		No	CIP SPECIAL SERVICE LIST
9	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
10	Patrick	Deal	pdeal@mnychamber.com	Minnesota Chamber of Commerce		400 Robert St N Ste 1500 Saint Paul MN, 55101 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
11	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435	Electronic Service		No	CIP SPECIAL SERVICE LIST

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12	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
13	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
14	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
15	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	CIP SPECIAL SERVICE LIST
16	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
17	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
18	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
19	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
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21	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
22	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
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25	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
26	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
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28	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
29	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
30	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
31	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	CIP SPECIAL SERVICE LIST
32	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
33	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
34	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	CIP SPECIAL SERVICE LIST

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35	Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy Minnesota Gas		212 3rd Ave. N. Suite 560 Minneapolis MN, 55401 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
36	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
37	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
38	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
39	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		No	CIP SPECIAL SERVICE LIST
40	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
41	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
42	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
43	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
44	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
45	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
46	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office	Electronic Service		No	CIP SPECIAL

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States				SERVICE LIST
47	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
48	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
49	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
50	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST