

November 21, 2025

Sasha Bergman
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. E999/CI-07-1199; G008, G002, G011/CI-23-117; and G999/CI-21-565

Dear Ms. Bergman,

Attached are the reply comments of the Minnesota Department of Commerce (Department) in the following matters:

In the Matter of Establishing an Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minn. Stat. §216H.06; In the Matter of a Commission Investigation into Gas Utility Resource Planning; In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals.

The Investigation in Docket No. G999/CI-21-565 was initiated by the Commission on July 23, 2021.

The Department provides its recommendations on the appropriate data source and values for the regulatory cost of greenhouse gas emissions for Xcel Energy, CenterPoint Energy, and Minnesota Energy Resource Corporation's upcoming gas integrated resource plans and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

SS/ar
Attachment



Before the Minnesota Public Utilities Commission

Reply Comments of the Minnesota Department of Commerce

Docket Nos. E999/CI-07-1199; G008, G002, G011/CI-23-117 and G999/CI-21-565.

I. INTRODUCTION

On August 25, 2025, the Minnesota Public Utilities Commission (Commission) issued a Notice of Comment Period in Docket Nos. E999/CI-07-1199; G008, G002, G011/CI-23-117 and G999/CI-21-565.¹ The August 2025 Notice included several topics and the issue of the appropriate data source and values for the regulatory cost of greenhouse gas emissions for Xcel Energy, CenterPoint Energy, and Minnesota Energy Resource Corporation’s upcoming gas integrated resource plans.

The Department filed its initial comments on November 3, 2025.² The Department’s 2025 Initial Comments provided extensive details regarding the procedural background in Section II of its Comments and the Department will not repeat them. Rather, the Department provides additional background information below.

II. PROCEDURAL BACKGROUND

October 27, 2025 CenterPoint Energy Minnesota Gas (CenterPoint or CPE) filed a compliance filing³ to the Commission’s Order clarifying and expanding framework for natural gas utility integrated resource planning⁴ on its methane emissions from its natural gas distribution system.

¹ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals, In the Matter of a Commission Investigation into Gas Utility Resource Planning, and In the Matter of Establishing an Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minnesota Statutes § 216H.06, Notice of Comment Period*, August 25, 2025, Docket Nos. G999/CI-21-565, G008,G002,G011/CI-23-117, and E-999/CI-07-1199, (eDockets) [20258-222376-01](#).

² Minnesota Department of Commerce, Initial Comments, November 3, 2025, Docket Nos. G999/CI-21-565, G008,G002,G011/CI-23-117, and E-999/CI-07-1199, (eDockets) [202511-224600-01](#), (hereinafter “Department’s 2025 Initial Comments”).

³ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals. In the Matter of a Commission Investigation into Gas Utility Resource Planning*, CenterPoint Energy, Compliance Filing, October 27, 2025, Docket Nos. G999/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [202510-224306-01](#), (hereinafter “CPE October 2025 Compliance Filing”).

⁴ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals and In the Matter of a Commission Investigation into Gas Utility Resource Planning, Order Clarifying and Expanding Framework For Natural Gas Integrated Resource Planning*, October 28, 2024, Docket Nos. G999/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [202410-211361-02](#), (hereinafter “October 2024 Framework Order”).

- October 28, 2025 Northern States Power Company doing business as Xcel Energy (Xcel),⁵ and Minnesota Energy Resources Corporation (MERC),⁶ submitted compliance filings on the methane emissions of their respective natural gas distribution systems.
- October 31, 2025 Several parties submitted Comments in this proceeding: 1) Minnesota Center for Environmental Advocacy (MCEA), Fresh Energy (FE) and Sierra Club (SC) filed joint comments⁷ (collectively, the Clean Energy Organizations or CEOs); 2) CPE⁸; 3) MERC⁹; and 4) Xcel.¹⁰
- November 3, 2025 Department filed its initial comments in the proceeding.¹¹

Topic(s) open for comment:

- Are the values established for Minn. Stat. § 216H.06 and last approved in Docket No. E999/CI-07-1199 in the Commission’s December 19, 2023 Order appropriate for use in Xcel Energy, CenterPoint Energy, and Minnesota Energy Resource Corporation’s upcoming IRPs?
- If the current values established in the instant docket are not appropriate, what data source and update timeframe should be used for the regulatory cost of GHG emissions values for natural gas IRPs?
- How does your recommendation account for the timing of a Commission decision on this topic with the need for modeling inputs for Xcel’s Gas IRP due July 1, 2026?
Are there other issues or concerns related to this matter?

⁵ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals and In the Matter of a Commission Investigation into Gas Utility Resource Planning*, Xcel Energy, Compliance Filing, October 28, 2025, Docket Nos. G999/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [202510-224321-01](#).

⁶ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals and In the Matter of a Commission Investigation into Gas Utility Resource Planning*, Minnesota Energy Resource Corporation, Compliance Filing, October 28, 2025, Docket Nos. G999/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [202510-224325-01](#).

⁷ Minnesota Center for Environmental Advocacy, Fresh Energy and Sierra Club, Initial Comments, October 31, 2025, Docket Nos. G99/CI-21-565, G008,G002,G011/CI-23-117, and E999/CI-07-1199, (eDockets) [202510-224503-01](#), (hereinafter “CEOs 2025 Initial Comments”).

⁸ CenterPoint Energy, Initial Comments, October 31, 2025, , Docket Nos. G99/CI-21-565, G008,G002,G011/CI-23-117, and E999/CI-07-1199, (eDockets) [202510-224515-01](#), (hereinafter “CPE’s 2025 Initial Comments”).

⁹ Minnesota Energy Resources Corporation, Initial Comments, October 31, 2025, Docket Nos. G99/CI-21-565, G008,G002,G011/CI-23-117, and E999/CI-07-1199, (eDockets) [202510-224490-01](#), (hereinafter “MERC’s 2025 Initial Comments”).

¹⁰ Xcel Energy, Initial Comments, October 31, 2025, Docket Nos. G99/CI-21-565 and G008,G002,G011/CI-23-117(eDockets) [202510-224471-01](#), (hereinafter “Xcel’s 2025 Initial Comments”).

¹¹Department’s 2025 Initial Comments.

III. DEPARTMENT ANALYSIS

The Department summarizes the other parties' initial comments and provides its analysis below.

A. DEPARTMENT'S RESPONSE TO OTHER PARTIES' INITIAL COMMENTS

A.1. MERC

In MERC's 2025 initial comments, MERC states the following:¹²

As recognized by the Commission, the regulatory cost of GHG emissions needs to be discussed as it will be an important consideration within Gas IRP scenarios.

MERC wishes to inform the Commission that the Company continues to evaluate the regulatory cost of GHG emissions and the role it should play within the context of Gas IRPs. MERC looks forward to reviewing the comments of other parties and intends to file more robust comments on or before the Reply Comment period closes in November.

In its initial comments, MERC did not substantively address the Commission's August 2025 Notice, However, MERC intends to address the Commission's August 2025 Notice in its reply comments.

A.2. CENTERPOINT

In its 2025 initial comments, CPE recommended establishing a lower regulatory cost of carbon value of \$0; it did not take a position on the upper bound of the regulatory cost of carbon value; finally, it recommended an effective date of 2030. CPE stated the following:¹³

Ultimately, CenterPoint Energy is concerned that leveraging the regulatory cost carbon as a decarbonization tool instead of as an input intended to improve the accuracy of utility models will result in the establishment of regulatory cost values that far exceed actual anticipated near-term regulatory costs and will unintentionally impact the deployment of various innovative technologies currently being piloted through our Natural Gas Innovation Act (NGIA) Innovation Plan.

The carbon regulation contemplated by the regulatory cost of carbon involves a direct cost to utilities for every short ton of CO2 emitted, similar to how a carbon tax might function. Several of the innovative technologies CenterPoint Energy is pursuing through the NGIA, including renewable natural gas (RNG) and gas heat pumps, do not eliminate end-use emissions

¹² MERC's 2025 Initial Comments at 2.

¹³ CPE's 2025 Initial Comments at 3-4.

and thus could subject CenterPoint Energy to these hypothetical regulatory costs if they were more widely deployed.

[...] A high regulatory cost of carbon right now may simply promote halting gas system expansion, because the ability to deploy other scalable solutions in response to high regulatory costs are limited during the current pilot phase of NGIA. Ultimately, CenterPoint Energy's concern is that by establishing an upper regulatory cost of carbon value that is based on ambitious climate change policy instead of the costs most likely to be faced by utilities within the next five to ten years, the Commission may unintentionally limit the Company's ability to plan for and deploy the various innovative resources currently being piloted under the NGIA. Such a result would contradict the legislature's interest in a broad range of innovative technologies.

While CenterPoint Energy is concerned that a high upper regulatory cost value could unintentionally limit the Company's ability to plan for and deploy innovative resources currently being piloted under the NGIA—for example, technologies like renewable natural gas (RNG) and gas heat pumps—it is unclear to the Department how that hindrance would occur. With everything else held constant, a higher upper regulatory cost of carbon applied to anthropogenic sources like stoves that use geologic gas, would result in a favorable economic comparison of RNG to geologic gas.

CPE also stated the following:¹⁴

A \$0 lower regulatory cost value represents a future in which no carbon regulations are put in place, or at least none that result in a direct cost to utilities and their customers through policies such as a carbon tax. This scenario would occur for a number of reasons. For example, it may be that no additional carbon legislation is enacted at the state or federal level, either because of changes in state and federal policy or because existing legislation is successful in reducing greenhouse gas emissions. It may also be that near term climate action at the state and federal level consists of incentives (carrots), instead of penalties (sticks). This is consistent with what we've seen thus far at the state level with legislation like the NGIA.

The current stance on climate policy at the federal level likely limits the potential for future carbon regulation and the Company recommends the Commission takes this into consideration when establishing the lower bound of regulatory costs.

[...] A 2030 effective date considers both the federal election cycle – with the next federal election slated for 2028 – and the International Monetary

¹⁴ CPE's 2025 Initial Comments at 4-5.

Fund's (IMF) 2022 research paper,⁹ which served as the basis for the \$75 upper regulatory cost of carbon value adopted by the Commission in 2023. The 2022 IMF research paper noted that a carbon floor price of \$75 per metric ton of CO₂ by 2030 for high income nations would be sufficient to keep global warming below 2.0 degrees Celsius. By moving the effective date for the regulatory cost of carbon from 2028 to 2030, the Commission could address the political position of the current federal administration while not extending the effective date beyond what was recommended in the IMF research paper which served as the basis for the current \$75 maximum regulatory cost value. [Citation omitted].

A \$0 value for the regulatory cost of carbon would be inconsistent with recent Commission Orders. In its December 2023 Regulatory Costs Order,¹⁵ the Commission declined to set the lower bound of the regulatory cost value at \$0, as it would, in effect, discontinue analysis of future regulatory costs. On March 27, 2024, the Commission issued an Order establishing a framework for natural gas utility integrated resource planning.¹⁶ Ordering paragraph 15 of the March 2024 Framework Order states the following:¹⁷

15. Utilities should 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 emissions.** [Emphasis added.]

In its June 28, 2024 Comments,¹⁸ Center for Energy and Environment (CEE) offered two possible methods by which to quantify the cost of regulation. CEE stated the following:¹⁹

This consideration in natural gas IRPs is analogous to the consideration of the costs of future carbon dioxide regulation, also called the regulatory cost of carbon, on electricity generation in electric resource planning, which is required by Minnesota Statute §216H.06. On December 19, 2023, the Commission established a range of regulatory costs of carbon dioxide emissions of \$5 to \$75 per short ton to be applied to electric resource plans and other dockets related to acquiring resources for generating electricity. The Commission's Order directs electric utilities to apply the regulatory

¹⁵ *Order Addressing Environmental and Regulatory Costs*, December 19, 2023, Docket Nos. E-999/CI-07-1199, E-999/DI-22-236, and E-999/CI-14-643, (eDockets) [202312-201351-02](#), (hereinafter "December 2023 Regulatory Costs Order").

¹⁶ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals* and *In the Matter of a Commission Investigation into Gas Utility Resource Planning, Order Establishing Framework For Natural Gas Utility Integrated Resource Planning*, March 27, 2024, Docket Nos. G999/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [20243-204681-01](#), (hereinafter "March 2024 Framework Order").

¹⁷ *Id.* at 7.

¹⁸ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals* and *In the Matter of a Commission Investigation into Gas Utility Resource Planning.*, Center for Energy and Environment, Comments, June 28, 2024, Docket Nos. 21-565 and 23-117, (eDockets) [20246-208066-01](#), (hereinafter "CEE's 2024 Initial Comments").

¹⁹ CEE's 2024 Initial Comments at 7-8.

cost of carbon dioxide in 2028 and thereafter in modeling and analyses included with electric resource planning and acquisitions.

Similarly, the ECO cost-effectiveness framework includes consideration of environmental compliance costs associated with natural gas. In the March 31, 2023 Decision, the Deputy Commissioner of the Department adopted a factor to be used for natural gas environmental compliance impacts in ECO cost-effectiveness testing of 1.40 percent of the commodity cost of natural gas for 2024 – 2045. The Department explained, “The initial value is based solely on proposed federal methane emissions standards that the EPA anticipates finalizing in 2024. All other gas environmental compliance factors are assumed to be [zero] for this Triennial. We derived the 1.40% estimate [sic] based on the EPA’s Regulatory Impact Analysis (RIA) for the proposed regulations.”

The Commission may wish to provide guidance to natural gas utilities related to the appropriate values or factors to apply to natural gas IRPs to estimate the costs of existing and future regulation of greenhouse gas emissions. The two examples provided above represent options to inform those values. CEE requests that the natural gas utilities and other interested 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. [Citations omitted.]

CPE²⁰ and Xcel²¹ supported using the values from the ECO cost-effectiveness framework. The Department²² and CEOs²³ did not oppose the use of this value (CEE’s first method) for the regulatory cost of greenhouse gas emissions. CEOs also supported CEE’s second method of using the values

²⁰ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals and In the Matter of a Commission Investigation into Gas Utility Resource Planning.*, CenterPoint Energy, Reply Comments, July 19, 2024, Docket Nos. G99/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [20247-208754-02](#).

²¹ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals and In the Matter of a Commission Investigation into Gas Utility Resource Planning.*, Xcel Energy, Reply Comments, July 19, 2024, Docket Nos. G99/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [20247-208750-01](#).

²² *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals. In the Matter of a Commission Investigation into Gas Utility Resource Planning.*, Minnesota Department of Commerce, Reply Comments, July 19, 2024, Docket Nos. G99/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [20247-208770-02](#).

²³ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals and In the Matter of a Commission Investigation into Gas Utility Resource Planning.*, Fresh Energy, Minnesota Center for Environmental Advocacy, and Sierra Club, Reply Comments, July 19, 2024, Docket Nos. G99/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [20247-208748-01](#), (hereinafter “CEOs 2024 Reply Comments”).

required by Minn. Stat. § 216H.06 for all electric generation resource proceedings, including electric IRPs, to inform the cost of regulating natural gas emissions.²⁴

A.3. XCEL ENERGY

In Xcel's 2025 initial comments, Xcel recommended establishing a lower bound regulatory cost of carbon value of \$0 to an upper bound regulatory cost of carbon value of \$13; and an effective date of 2030. Xcel also requested a Commission decision in this proceeding be issued by the end of January 2026 to provide time for Xcel to incorporate the regulatory cost of greenhouse gas emissions into its natural gas IRP modeling runs.

Xcel stated the following:²⁵

In summary, the regulatory cost values that have been developed to reflect the potential future costs associated with carbon dioxide regulation in the context of *electricity* generation are not appropriate for assessing natural gas supply-side resources. To ensure accurate and meaningful planning, the regulatory cost of GHGs must be tailored to reflect sector-specific risks and regulatory mechanisms. Not only are the GHG control mechanisms and costs different between sectors, so are the market structures and reflection of these costs.

We recommend the Commission base estimates of the regulatory cost of carbon for natural gas supply resources on U.S. Environmental Protection Agency (EPA) rules to reduce methane from oil and gas (O&G) operations, while taking into consideration the unknown future of these regulations and federal GHG regulations in general. Specifically, we suggest a range of \$0 - \$13 / MMT CO₂e to capture the potential range of future regulatory costs of carbon for natural gas supply with 2030 as the initial year of application. Selecting 2030 accounts for the uncertainty in current rulemakings and aligns with the midpoint of EPA's projected compliance cost and emissions reduction period (2024-2038), offering a balanced approach and conservative approach for planning purposes.

We appreciate the importance of aligning the timing of a Commission decision with the modeling needs for our gas IRP that is due July 1, 2026. Based on our current planning timeline, we anticipate conducting final modeling runs starting in February 2026. A Commission decision issued by the end of January 2026 would provide sufficient time for the Company to incorporate the regulatory cost of GHGs into its natural gas IRP. [Citations omitted.]

²⁴ *Id.*, at 2-4 and 9.

²⁵ Xcel's 2025 Initial Comments at 1-2.

Xcel states that the regulatory cost of carbon values under Minn. Stat. § 216H.06 were developed to reflect the state and/or federal regulatory mechanisms that apply to electricity generation and “the costs those regulations might impose on emissions from electricity generation – do not account for the distinct cost structures or the state and federal regulatory pathways associated with upstream emission reductions in the natural gas sector.”

Xcel also provides its basis for the regulatory cost range of \$0-\$13 per million metric tons of CO₂ equivalent (MMT CO₂e) and, like CPE, discusses the uncertainty of federal regulations.

Xcel states the following:²⁶

We recommend the Commission base estimates of the regulatory cost of carbon for natural gas supply resources on EPA rules to reduce methane from oil and gas (O&G) operations, while taking into consideration the unknown future of these regulations and federal GHG regulations in general. The EPA regulations apply to production and transmission upstream of the local distribution utility and therefore could impact natural gas supply commodity prices in alignment with the scope of this application in natural gas IRPs.

For example, we recommend leveraging the Regulatory Impact Analysis of the Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review. Table 1-3 of that Regulatory Impact Analysis projects GHG emission reductions of 1,500 million metric tons of CO₂ equivalent for the 2024-2038 timeframe. Table 1-6 provides net compliance costs for new and existing sources less the value of product recovery ranging from \$19,000 to \$14,000 million in Present Value (PV), for 2 percent to 7 percent discount rate respectively, over the period of 2024 – 2038. This would roughly equate to \$13 per metric ton CO₂e, conservatively using the high point of the compliance cost range.

However, these regulations were developed under the previous Federal Administration and face uncertainty under the current Federal Administration. The EPA opened a comment period seeking input on proposed delays and any additional amendments in a rulemaking.

[...] Therefore, we would suggest a range of \$0 - \$13 / MMT CO₂e to capture the potential range of future regulatory costs of carbon for natural gas supply with 2030 as the initial year of application. Selecting 2030 accounts for the uncertainty in current rulemakings and aligns with the midpoint of EPA’s projected compliance cost and emissions reduction

²⁶ Xcel’s 2025 Initial Comments at 4-5.

period (2024-2038), offering a balanced approach and conservative approach for planning purposes. [Citations omitted.]

As above, Xcel discusses the potential repeal and uncertainties of federal regulations and basing the regulatory costs of carbon on upstream methane emissions.

A.4. CEOs

CEOs describe how the regulatory cost of carbon values established under Minn. Stat. § 216H.06 and approved in the Commission’s December 2023 Regulatory Costs Order are applicable in gas resource planning.

CEOs state the following:²⁷

We first address why the regulatory cost of carbon values approved by the Commission for electric utilities are equally applicable in gas planning. The primary argument against using these values has been that they are based on the likelihood of future regulation of electric utilities and therefore are inapplicable to gas utilities.⁶ This reasoning is incorrect. As explained in the Regulatory Cost of Carbon docket (07-1199), the upper limit of \$75 per ton represents the minimum amount of a carbon fee or tax required to keep global temperature rise below 2 degrees Celsius.⁷ This value is not derived from regulations specific to the electricity sector; rather, it reflects a global goal of limiting warming to levels consistent with human and ecological survival.

Moreover, Minnesota’s statutory greenhouse gas reduction goals are more ambitious than the 2-degree Celsius goal. Minnesota’s goals are based on keeping warming to 1.5 degrees Celsius, which is necessary to protect the most vulnerable populations.⁸ The gas sector will need to be equally involved in decarbonization as the electric sector has been if these goals are to be achieved. Accordingly, the upper end of the “regulatory cost of carbon” range should apply equally to carbon dioxide emissions from the gas sector.

In planning terms, this cost represents the future expenditures utilities will likely incur to comply with future regulations directed at CO2 emissions (e.g., a carbon tax). It should be applied to projected gas consumption, paralleling how electric utilities apply the cost to forecasted demand and emissions from electricity generation. [Citations Omitted].

In addition, the CEOs state that the gas sector faces a distinct category of emissions that require a separate regulatory cost estimate. CEOs state that methane emissions and leakage occur in the system

²⁷ CEOs 2025 Initial Comments at 2-3.

prior to delivery of the natural gas fuel to customers. According to the CEOs, methane leakage would not be subject to a carbon tax, these methane costs—the 1.4% adder to the commodity cost of gas applied through the ECO framework—should be applied separately in gas resource planning to represent distinct categories of greenhouse gas emissions. CEOs state the following:

Our groups recommend that both regulatory cost estimates are applicable in gas resource planning, depending on the category of emissions being addressed.

[...] However, the gas sector also faces significant methane emissions from leakage in the system prior to the delivery of gas to customers. Methane leakage is the target of federal regulation, and those rules informed the creation of the 1.4% “adder” to the commodity cost of gas, used in the ECO context, intended to account for future regulation of methane.¹⁰ That adder was based on the Regulatory Impact Analysis of the U.S. Environmental Protection Agency’s (EPA’s) proposed methane regulations. The costs of complying with methane regulations are in addition to the costs of meeting carbon reduction goals. Because methane leakage would not be subject to a carbon tax, these costs should be applied separately in gas resource planning to accurately represent distinct categories of greenhouse gas emissions. [Citations Omitted].

A.5. DEPARTMENT’S ADDITIONAL OBSERVATIONS AND RECOMMENDATIONS

It is the Department’s understanding that sellers of natural gas are not required to share methane data, as a result upstream methane emissions data would be questionable. In addition, gas utilities like CPE, Xcel, and MERC typically also buy natural gas from pooled resources which would make it difficult to ascertain the individual supplier from which each gas molecule originates. Local distribution companies like CPE, Xcel, and MERC not only buy natural gas from within the United States, but also from Canada. Transnational purchases may further complicate calculations of upstream emissions.

As explained in detail in the Department’s 2025 initial comments²⁸, greenhouse gas emissions defined under Minn. Stat. § 216B.2427, subd., 1 are substantively similar as the “statewide greenhouse gas emissions” defined under Minn. Stat. § 216H.01, subd. 2.

²⁸ Departments 2025 Initial Comments at 7-10.

As noted earlier, given the issues regarding emissions data, the Commission in its October 2024 Framework Order²⁹ made the following findings in relevant ordering paragraphs, in the section titled, “Comprehensive Gas IRP Requirements” as follows:³⁰

15. Utilities should 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 emissions.**

[...] 52. CenterPoint, MERC, and Xcel must report methane emissions from natural gas distribution system operations using available reporting protocols in the natural gas integrated resource plan until a system specific leakage estimate derived from measured leakage from the utility distribution system is available. Within 12 months of the October 28, 2024 order, each utility shall file a report including the capital and O&M costs of procedures for system specific leakage rates measurements and a description of their current practices.

53. CenterPoint, MERC, and Xcel must include in their gas IRPs additional information about upstream emissions data availability. [Emphasis added.]

54. Natural gas resource plans shall include the cost of each scenario and sensitivity presenting both the utility’s revenue requirement and environmental costs and other externalities to the utility’s revenue requirement.

a. CenterPoint, MERC, and Xcel must use the most recent externality values adopted by the Commission in Docket No. E-999/CI-14-643 to estimate environmental externality costs of resource options in gas IRPs.

b. The Commission delegates authority to the Executive Secretary to open a comment period in Docket Number E999/CI-07-1199 to consider and determine the appropriate data source and values for the regulatory cost of greenhouse gas emissions for natural gas resource planning through the upcoming docket to update the regulatory cost of carbon for electric resource planning.

55. A natural gas utility’s preferred plan should include both (1) a ten-year sales and emissions forecast, and (2) a five-year action plan of the specific steps that it will take to implement that plan over the next five years.

²⁹ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals and In the Matter of a Commission Investigation into Gas Utility Resource Planning, Order Clarifying and Expanding Framework For Natural Gas Integrated Resource Planning*, October 28, 2024, Docket Nos. G999/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [202410-211361-02](#), (hereinafter “October 2024 Framework Order”).

³⁰ October 2024 Framework Order at 13-14, 19 in the main body of the Order, and in the section titled, “Comprehensive Gas IRP Requirements” at 2, and 7-8.

- a. For each project proposed in its preferred five-year action plan, CenterPoint, MERC, and Xcel must include justification of need, resource mix, project scope, construction timeline, cost estimates including any offsetting revenues and tax benefits, and a narrative discussion of any equity impacts the project may have.
- b. CenterPoint, MERC, and Xcel must include in each integrated resource plan a narrative description of how its preferred plan will support and serve Minnesota's greenhouse-gas-emission-reduction goals.

The Commission has previously rejected the lower regulatory cost of carbon value of \$0, as explained in its December 2023 Regulatory Order. The Department recommends that CPE's and Xcel's proposal to use a lower regulatory cost of carbon value of \$0 should be rejected.

Given the concerns with upstream methane emissions data described above, the Department recommends that the Commission reject Xcel's proposal to use the higher regulatory cost of greenhouse emissions value of \$13.

Given the concerns with upstream methane emissions data described above, and CPE's and Xcel's prior support in using the values from the ECO cost-effectiveness framework; the Department and CEOs not opposing the use of this value (CEE's first method) for the regulatory cost of greenhouse gas emissions, the Department recommends that Commission use this value for regulatory costs related to methane emissions. In addition, the Department maintains the recommendations from its initial comments.

IV. DEPARTMENT RECOMMENDATIONS

The Department's recommendations from its initial comments are first provided below. Based on the above analysis, the Department has prepared additional recommendations, which are also provided below.

First, the Department's recommendations correspond to the subheadings of Section III from its initial comments below.

A. MINN. STAT. § 216H.

- A.1. The Department will separately address the Commission's September 2025 Notice in Docket No. DI-25-345 and Docket No. CI-07-1199 after comments are received by November 7, 2025.

E. COMMISSION'S AUGUST 2025 NOTICE

- E.1. The Commission could require the use of the values for the regulatory cost of greenhouse gas emissions for Xcel, CenterPoint, and MERC's upcoming gas integrated resource plans using the values established for Minn. Stat. § 216H.06 and last approved in Docket No. E999/CI-07-1199 in the Commission's December 2023 Regulatory Costs Order with the determination that they are appropriate in gas IRP proceedings.
- Thus, because of the interplay between Minn. Stat. §216H and Minn. Stat. § 216B.2427 and 2428 and the definition of emissions as described above, as well as the overall emissions

reduction goal specified by the legislature, the Department recommends that Commission use the current values as established in Docket 07-1199.

- E.3. The Department’s recommendation that the Commission could require the use of the values for the regulatory cost of greenhouse gas emissions using the values established for Minn. Stat. § 216H.06 and last approved in Docket No. E999/CI-07-1199 in the Commission’s December 2023 Regulatory Costs Order; will allow Xcel to incorporate these established values in its modeling inputs.
- Once the Agencies seeks feedback in Dockets 25-345 and 07-1199 based on the Commission’s September 2025 Notice, and the Agencies provide their analysis and recommendations to the Commission; and once the Commission makes its determinations on the regulatory costs of greenhouse gas emissions during the course of the proceedings in Docket 07-1199; CenterPoint will have enough time to incorporate those values in its upcoming IRP due on July 1, 2027. Similarly, MERC will have enough time to incorporate those values in its upcoming IRP due on July 1, 2028.
- E.4.1. Xcel should also identify, explain, and discuss both its internal accounting and Federal Energy Regulatory Commission’s (FERC) accounts and sub-accounts that will be used to track and record its internal costs and future regulatory costs associated with its upcoming natural gas IRP.
- The Department seeks validation and confirmation from Xcel in its Reply Comments in this proceeding that future regulatory costs are considered as future internal costs and treated just like any other variable cost and are therefore considered by the model when it selects units to dispatch.
- E.4.2. The Department recommends that CPE, Xcel, and MERC provide the following information in their respective Reply Comments, as follows:
 - Consistent with the information supplied by the LDC to EPA’s GHGRP, provide information for 2024;
 - Provide a short narrative description of how the values listed in the table above, and inclusive of data for 2024, were tabulated and calculated;
 - Provide the natural gas deliveries (in Dekatherms) for the years 2010 through 2024 segregated by end-user (that is separately for residential customers, commercial customers, industrial customers, and electric generating facilities);
 - Provide the natural gas deliveries (in Dekatherms) for the years 2010 through 2024 further segregated between sales and transport categories by end-user (that is separately for residential customers, commercial customers, industrial customers, and electric generating facilities); and
 - To identify, explain, and discuss both the internal accounting and FERC accounts and sub-accounts that are used to track and record the internal costs used in reporting the data above.

Second, the Department’s recommendations correspond to the subheadings of Section III from above.

A. DEPARTMENT'S RESPONSE TO OTHER PARTIES INITIAL COMMENTS

- A.5. The Department recommends that the Commission:
 - Reject CPE's and Xcel's proposal to use this a lower regulatory cost of carbon value of \$0;
 - reject Xcel's proposal to use the higher regulatory cost of greenhouse emissions value of \$13; and,
 - use the values from the ECO cost-effectiveness framework (1.4% to the commodity cost of natural gas) for regulatory costs related to methane emissions.

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. E999/CI-07-1199; G008, G002, G011/CI-23-117; and G999/CI-21-565

Dated this **21st** day of **November 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	7-1199Official
2	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	7-1199Official
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	7-1199Official
4	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	7-1199Official
5	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	7-1199Official
6	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	7-1199Official
7	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	7-1199Official
8	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	7-1199Official
9	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		Yes	7-1199Official
10	Barb	Freese	bfreese@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55104-3435 United States	Electronic Service		No	7-1199Official
11	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102	Electronic Service		No	7-1199Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
12	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	7-1199Official
13	Joe	Hoffman	ja.hoffman@smmpa.org	SMPMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	7-1199Official
14	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	7-1199Official
15	Casey	Jacobson	cjacobson@bepec.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	7-1199Official
16	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	7-1199Official
17	Craig	McDonnell	craig.mcdonnell@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Road St. Paul MN, 55101 United States	Electronic Service		No	7-1199Official
18	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	7-1199Official
19	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	7-1199Official
20	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	7-1199Official
21	Peter	Nelson	peter.nelson@americanexperiment.org	Center of the American Experiment		8441 Wayzata Boulevard Suite 350 Golden Valley MN, 55426 United States	Electronic Service		No	7-1199Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
22	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	7-1199Official
23	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	7-1199Official
24	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	7-1199Official
25	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	7-1199Official
26	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	7-1199Official
27	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	7-1199Official
28	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	7-1199Official
29	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	7-1199Official
30	Karen	Tyler	kyler@nd.gov	Industrial Commission of North Dakota		14th Floor 600 E. Boulevard Avenue, Dept. 405 Bismarck ND, 58505 United States	Electronic Service		No	7-1199Official
31	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	7-1199Official

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32	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	7-1199Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	21-565Official Service List
2	Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource		15669 WATERLOO CIR TRUCKEE CA, 96161 United States	Electronic Service		No	21-565Official Service List
3	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	21-565Official Service List
4	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
5	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	21-565Official Service List
6	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
7	Ryan	Baumtrog	ryan.baumtrog@state.mn.us		Minnesota Dept of Housing	400 Wabasha St N Ste 400 St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
8	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
9	Randall	Beck	rbeck3@wm.com	Waste Management Renewable Energy, L.L.C.		1021 Main St Houston TX, 77002 United States	Electronic Service		No	21-565Official Service List
10	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	21-565Official Service List
11	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	21-565Official Service List
12	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
13	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	21-565Official Service List
14	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
15	Tim	Brinkman	tim.brinkman@gvtel.com	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
16	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21-565Official Service List
17	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	21-565Official Service List
18	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	21-565Official Service List
19	Andrew	Campeau	andyc@mnpipetrades.com	Minnesota Pipe Trades Association		353 W 7th street st paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
20	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
21	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	21-565Official Service List
22	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
23	Olivia	Carroll	oliviac@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
24	Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org			Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
25	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
26	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	21-565Official Service List
27	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	21-565Official Service List
28	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	21-565Official Service List

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29	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	21-565Official Service List
30	Jean	Comstock	jean.comstock.dbcc@gmail.com		St. Paul 350	729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
31	Noah	Cordoba	noah@buildingdecarb.org		Building Decarbonization Coalition	33594 Herring View Drive Lewes DE, 19958 United States	Electronic Service		No	21-565Official Service List
32	George	Crocker	gwillc@nawo.org		North American Water Office	5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	21-565Official Service List
33	Seth	DeMerritt	seth.demerritt@centerpointenergy.com		CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
34	James	Denniston	james.r.denniston@xcelenergy.com		Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
35	Tom	Dicklich	tdicklich@mntrades.org		Minnesota Building & Construction Trades Council	353 W. 7th St Rm 105 Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
36	J.	Drake Hamilton	hamilton@fresh-energy.org		Fresh Energy	408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
37	Brian	Edstrom	briane@cubminnesota.org		Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
38	Caitlin	Eichten	eichten@fresh-energy.org		Fresh Energy	408 St Peter St #350 St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
39	John	Farrell	jfarrell@ilsr.org		Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	21-565Official Service List
40	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	21-565Official Service List
41	Mike	Fiterman	mikefiterman@libertydiversified.com		Liberty Diversified International	5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	21-565Official Service List
42	Mark	Foster	mark@housingfirstmn.org		Housing First Minnesota	2960 Centre Pointe Drive Roseville MN, 55113 United States	Electronic Service		No	21-565Official Service List

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44	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	21-565Official Service List
45	Patrick	Garofalo	pgarofalo@mngrocers.com	Minnesota Grocers Association		1360 Energy Park Drive Suite #300 St Paul MN, 55108 United States	Electronic Service		No	21-565Official Service List
46	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
47	James	Gignac	jgignac@ucsusa.org	Union of Concerned Scientists		1 N LaSalle St Ste 1904 Chicago IL, 60602 United States	Electronic Service		No	21-565Official Service List
48	Debbie	Goettel	debbie.goettel@hennepin.us	Partnership on Waste and Energy		2785 White Bear Ave N Ste 350 Maplewood MN, 55109 United States	Electronic Service		No	21-565Official Service List
49	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	21-565Official Service List
50	Laura	Haight	lhaight@pfpi.net	Partnership for Policy Integrity		POB 2513 Amherst MA, 01004 United States	Electronic Service		No	21-565Official Service List
51	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
52	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	21-565Official Service List
53	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	21-565Official Service List
54	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
55	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	21-565Official Service List
56	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
57	Megan	Hoye	megan.hoye@minneapolismn.gov	City of Minneapolis		505 Fourth Ave S.	Electronic Service		No	21-565Official

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60	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
61	Alan	Jenkins	aj@jenkinsattlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21-565Official Service List
62	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
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65	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	21-565Official Service List
66	D	Kalmon	dkalmon@mwwmo.org	Mississippi Watershed Management Organization		2522 Marshall St NE Minneapolis MN, 55418-3329 United States	Electronic Service		No	21-565Official Service List
67	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	21-565Official Service List
68	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
69	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	21-565Official Service List
70	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	21-565Official Service List
71	Mark	Kresowik	mkresowik@aceee.org	American Council for an Energy-Efficient Economy		529 14th St NW, Suite 600 Washington DC, 20045 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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73	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
74	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
75	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	21-565Official Service List
76	Robert	Lems	administration@dm-tcgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	21-565Official Service List
77	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	21-565Official Service List
78	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
79	Margaret	Levin	margaret.levin@sierraclub.org	Sierra Club North Star Chapter		2300 Myrtle Ave Ste 260 St. Paul MN, 55114 United States	Electronic Service		No	21-565Official Service List
80	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-565Official Service List
81	Sydney	Lieb	sydney.lieb@state.mn.us		Department of Commerce	85 7th Place East, Suite 280 St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
82	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
83	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21-565Official Service List
84	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List

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86	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	21-565Official Service List
87	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
88	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	21-565Official Service List
89	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	21-565Official Service List
90	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	21-565Official Service List
91	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-565Official Service List
92	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	21-565Official Service List
93	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
94	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-565Official Service List
95	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
96	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
97	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
98	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	21-565Official Service List
99	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
100	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
101	Will	Nissen	wnissen@mncee.org	Center for Energy and Environment			Electronic Service		No	21-565Official Service List
102	Curtis	Nordgaard	nordgaard@fresh-energy.org	Fresh Energy		408 Saint Peter Street Suite 350 St Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
103	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-565Official Service List
104	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
105	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	21-565Official Service List
106	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
107	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
108	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	21-565Official Service List
109	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	21-565Official Service List
110	Bret	Pence	bretpence@mnipl.org	Minnesota Interfaith Power and Light		106 Waverly Place Duluth MN, 55803 United States	Electronic Service		No	21-565Official Service List
111	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
112	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List
113	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	21-565Official Service List
114	Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	21-565Official Service List
115	Lauren	Reeg	lreeg@rmi.org	RMI		806 N Pinyon Ct. Hartland WI, 53029 United States	Electronic Service		No	21-565Official Service List
116	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	21-565Official Service List
117	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	21-565Official Service List
118	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	21-565Official Service List
119	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	21-565Official Service List
120	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	21-565Official Service List
121	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
122	Kathleen	Schuler	kathleen@hpforhc.org	Health Professionals for a Healthy Climate		Health Professionals for a Healthy Climate PO Box 583013 Minneapolis MN, 55458-3013 United States	Electronic Service		No	21-565Official Service List
123	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	21-565Official Service List
124	Patrick	Serfass	pserfass@ttcorp.com	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
125	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
126	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	21-565Official Service List
127	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
128	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	21-565Official Service List
129	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	21-565Official Service List
130	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	21-565Official Service List
131	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
132	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	21-565Official Service List
133	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	21-565Official Service List
134	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
135	Mark	Spurr	mospurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
136	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	21-565Official Service List
137	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
138	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
139	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
140	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-565Official Service List
141	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	21-565Official Service List
142	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	21-565Official Service List
143	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	21-565Official Service List
144	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L Street #513 Sacramento CA, 95814 United States	Electronic Service		No	21-565Official Service List
145	Jenna	Warmuth	jenna@rewiringamerica.org	Rewiring America		3218 Georgia Ave NW, Suite 1 Washington DC, 20011 United States	Electronic Service		No	21-565Official Service List
146	Nicole	Westling	nicole.westling@state.mn.us		Department of Commerce	85 7th Place E Suite 280 St Paul MN, 55001 United States	Electronic Service		No	21-565Official Service List
147	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	21-565Official Service List
148	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	21-565Official Service List
149	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
150	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	21-565Official Service List
151	Mariko	Yatsuhashi	myatsuhashi@mncee.org	Center for Energy and Environment		212 N 3rd Ave Suite 560 Minneapolis MN, 55404 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
152	Grant	Zimmerman	gzimmerman@ampamericas.com	Amp Americas		811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States	Electronic Service		No	21-565Official Service List
153	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	21-565Official Service List
154	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	21-565Official Service List
155	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	23-117Official List
2	Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource		15669 WATERLOO CIR TRUCKEE CA, 96161 United States	Electronic Service		No	23-117Official List
3	Jose	Alvillar	jose@unidos-mn.org	Unidos-MN		null null, null United States	Electronic Service		No	23-117Official List
4	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	23-117Official List
5	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-117Official List
6	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	23-117Official List
7	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
8	James H.	Barkley	james.barkley@bakerbotts.com	Baker Botts		910 Louisiana Street Houston TX, 77002-4995 United States	Electronic Service		No	23-117Official List
9	Marisa	Bayer	mbayer@edinamn.gov	City of Edina		4801 W 50th St Edina MN, 55424 United States	Electronic Service		No	23-117Official List
10	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	23-117Official List
11	Randall	Beck	rbeck3@wm.com	Waste Management Renewable Energy, L.L.C.		1021 Main St Houston TX, 77002 United States	Electronic Service		No	23-117Official List
12	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	23-117Official List
13	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	23-117Official List
14	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
15	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	23-117Official List
16	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
17	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		Yes	23-117Official List
18	Jocelyn	Bremer	jocelyn.bremer@minneapolismn.gov	City of Minneapolis		350 S Fifth St Ste 210 Minneapolis MN, 55415 United States	Electronic Service		No	23-117Official List
19	Tim	Brinkman	tim.brinkman@gvtel.com	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	23-117Official List
20	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-117Official List
21	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	23-117Official List
22	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	23-117Official List
23	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	23-117Official List
24	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	23-117Official List
25	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
26	Barbara	Case	barbara.case@state.mn.us		Office of Administrative Hearings	600 N. Robert St. St. Paul MN, 55101 United States	Electronic Service		No	23-117Official List
27	Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org			Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul MN, 55102 United States	Electronic Service		No	23-117Official List
28	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-117Official List
29	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
30	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	23-117Official List
31	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	23-117Official List
32	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	23-117Official List
33	Jean	Comstock	jean.comstock.dbcc@gmail.com		St. Paul 350	729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	23-117Official List
34	Noah	Cordoba	noah@buildingdecarb.org	Building Decarbonization Coalition		33594 Herring View Drive Lewes DE, 19958 United States	Electronic Service		No	23-117Official List
35	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-117Official List
36	Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 St. Paul MN, 55104 United States	Electronic Service		No	23-117Official List
37	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
38	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
39	Tom	Dicklich	tdicklich@mntrades.org	Minnesota Building & Construction Trades Council		353 W. 7th St Rm 105 Saint Paul MN, 55102 United States	Electronic Service		No	23-117Official List
40	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	23-117Official List
41	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	23-117Official List
42	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
43	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	23-117Official List
44	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	23-117Official List
45	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	23-117Official List
46	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	23-117Official List
47	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	23-117Official List
48	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	23-117Official List
49	Debbie	Goettel	debbie.goettel@hennepin.us	Partnership on Waste and Energy		2785 White Bear Ave N Ste 350 Maplewood MN, 55109 United States	Electronic Service		No	23-117Official List
50	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	23-117Official List
51	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
52	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-117Official List
53	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	23-117Official List
54	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-117Official List
55	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	23-117Official List
56	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55402 United States				
57	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	23- 117Official List
58	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	23- 117Official List
59	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	23- 117Official List
60	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	23- 117Official List
61	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	23- 117Official List
62	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23- 117Official List
63	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 117Official List
64	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 117Official List
65	Brendan	Jordan	bjordan@gpsid.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	23- 117Official List
66	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	23- 117Official List
67	D	Kalmon	dkalmon@mwmw.org	Mississippi Watershed Management Organization		2522 Marshall St NE Minneapolis MN, 55418- 3329 United States	Electronic Service		No	23- 117Official List
68	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23- 117Official List
69	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23- 117Official List
70	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution	520 Lafayette Rd N. St. Paul MN,	Electronic Service		No	23- 117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Control Agency	55155 United States				
71	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
72	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-117Official List
73	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	23-117Official List
74	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
75	Andrew	Larson	andrew.m.larson@state.mn.us		Public Utilities Commission	121 7th Place E., #350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23-117Official List
76	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-117Official List
77	Robert	Lems	administration@dmr-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	23-117Official List
78	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-117Official List
79	Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-117Official List
80	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-117Official List
81	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
82	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-117Official List
83	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List

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85	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	23-117Official List
86	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
87	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	23-117Official List
88	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-117Official List
89	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	23-117Official List
90	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	23-117Official List
91	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-117Official List
92	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-117Official List
93	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
94	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	23-117Official List
95	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-117Official List
96	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
97	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
98	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	23-117Official List
99	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
100	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-117Official List
101	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-117Official List
102	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-117Official List
103	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	23-117Official List
104	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	23-117Official List
105	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
106	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		Yes	23-117Official List
107	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-117Official List
108	Kevin	Pranis	kpranis@llunagro.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-117Official List
109	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	23-117Official List
110	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	23-117Official List
111	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester	Electronic Service		No	23-117Official List

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112	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	23-117Official List
113	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	23-117Official List
114	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
115	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	23-117Official List
116	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-117Official List
117	Patrick	Serfass	pserrfass@ttcorp.com	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	23-117Official List
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119	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	23-117Official List
120	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	23-117Official List
121	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-117Official List
122	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-117Official List
123	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-117Official List
124	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-117Official List

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126	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
127	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
128	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	23-117Official List
129	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
130	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	23-117Official List
131	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
132	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	23-117Official List
133	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
134	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	23-117Official List
135	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-117Official List
136	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L Street #513 Sacramento CA, 95814 United States	Electronic Service		No	23-117Official List
137	Nicole	Westling	nicole.westling@state.mn.us		Department of Commerce	85 7th Place E Suite 280 St Paul MN, 55001 United States	Electronic Service		No	23-117Official List
138	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	23-117Official List

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140	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
141	James	Worlobah	james.worlobah@state.mn.us		Public Utilities Commission	121 7th Place E, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	23-117Official List
142	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-117Official List
143	Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts		700 K St NW Washington DC, 20001 United States	Electronic Service		No	23-117Official List
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145	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-117Official List
146	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	23-117Official List
147	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List