

July 28, 2025

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

RE: Comments of the Minnesota Department of Commerce
Docket No. G008/M-23-215

Dear Mr. Seuffert:

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

In the Matter of Center Point Energy's Natural Gas Innovation Act Annual Report for Calendar Year 2024

The Petition was filed by CenterPoint Energy on May 30, 2025.

The Department recommends the Commission **Accept** CenterPoint Energy's NGIA Annual Report and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

Analyst(s) MZ/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G008/M-23-215

I. INTRODUCTION

On May 30, 2025, CenterPoint Energy (CenterPoint or the Company) filed its Natural Gas Innovation Act (NGIA) Annual Report for Calendar Year 2024 (Petition) with the Minnesota Public Utilities Commission (Commission).¹ This is the first NGIA annual report for the Company following the Commission's October 9, 2024 Order approving and implementing the Company's NGIA plan.² The Petition covers activities taken by the Company for its NGIA plan following the NGIA Order through the end of 2024. As this period was very short, very little action has taken place. As such the Company indicated that much of its Petition is designed to demonstrate how future reports will present NGIA implementation information.

II. PROCEDURAL BACKGROUND

June 26, 2021	Governor Walz signed Minnesota's Natural Gas Innovation Act into law establishing a regulatory framework for natural gas utilities to contribute to meeting Minnesota's greenhouse gas reduction and renewable energy goals through the development of "innovation plans" using "innovative resources." ³
June 28, 2023	CenterPoint Energy filed its first NGIA plan with the Commission for approval. ⁴
October 9, 2024	The Commission issued its Order approving and implementing the Company's NGIA plan. ⁵
May 30, 2025	CenterPoint filed its Annual Report for Calendar Year 2024 ⁶
June 13, 2025	The Commission issued a Notice of Comment Period requesting comments from parties by July 28, 2025. ⁷

¹ *In the Matter of Petition by CenterPoint Energy for Approval of its First Natural Gas Innovation Plan*, CenterPoint Energy, 2024 Annual Report, May 30, 2025, Docket No. G008/M-23-215, (eDockets) [20255-219457-01](#), (hereinafter "Petition.")

² *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan, Order Approving Natural Gas Innovation Plan with Modifications*, October 9, 2024, Docket No. G-008/M-23-215, (eDockets) [202410-210845-01](#), (hereinafter "NGIA Order").

³ Minnesota Laws 2021, 1st Special Session, ch. 4, art. 8, §§ 20-21, 27.

⁴ *In the Matter of Petition by CenterPoint Energy for Approval of its First Natural Gas Innovation Plan*, CenterPoint Energy, Petition, June 28, 2023, Docket No. G008/M-23-215, (eDockets) [20236-196995-01](#), (hereinafter "CPE NGIA Filing.")

⁵ NGIA Order.

⁶ Petition.

⁷ *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan, Notice of Comment Period*, June 13, 2025, Docket No. G-008/M-23-215, (eDockets) [20256-219869-01](#), (hereinafter "Commission's NOC").

Topics open for comment:

- Should the Commission approve the continuation of CenterPoint's plan, approve the continuation of CenterPoint's plan with modifications, or disapprove the continuation of CenterPoint's Plan?
- Should the Commission require modifications to any of CenterPoint's pilot or R&D projects?
- Should the Commission disapprove the continuation of any pilot or R&D project?
- Are there any proposed or existing modifications to federal law and/or tax policy that might affect the feasibility of approved projects?
- Should the Commission approve CenterPoint's Proposed Innovation Act Adjustment rider proposal?
- Should the Commission consider requiring CenterPoint to file its proposed Innovation Act Adjustment rider proposals in a separate docket going forward? Would this separation prevent such discussions from delaying decisions involving the approval, modification, or disapproval of CenterPoint's plan, or vice versa?
- Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

The Department first provides its analysis of the NGIA performance data as provided by the Company, followed by an analysis of CenterPoint's proposed rider, and then concludes by responding to the Commission's remaining questions. The Company's NGIA Plan includes 17 pilot programs and additional research and development (R&D) pilots.

A. NGIA ANNUAL REPORT

A.1. NGIA Performance

As the NGIA Order only implemented the Company's NGIA plan for a little over two months of 2024, the Company does not claim to have yet achieved any greenhouse gas savings under the plan. Many of the pilots require significant lead up time to achieve savings, and all require at least some time to install equipment, sign contracts, or other steps. The Department concludes it is reasonable for the Company to have not achieve any reportable savings for 2024. Table 1 below shows the estimated savings by plan compared to the total estimated lifecycle green house gas (GHG) reductions of each pilot in metric tons of carbon dioxide equivalent (CO₂e) approved in the NGIA Order.

Table 1: CenterPoint NGIA GHG Savings by Pilot⁸

Pilot	Estimated Lifecycle GHG Reductions (Metric Tons of CO2e from 2024)	Estimated Lifecycle GHG Reductions (Metric Tons CO2e) from Prior Plan Years	Total Cumulative GHG Reductions (Metric Tons CO2e) from Plan as of end of 2024	Estimated Lifecycle GHG Reductions (Metric Tons CO2e) in Approved Plan	Percentage Achieved GHG Reductions to Estimate
B – RNG Produced from Ramsey & Washington Counties Organic Waste	0	0	0	92,414	0.00%
C - Renewable Natural Gas RFP Purchase	0	0	0	423,134	0.00%
D - Green Hydrogen Blending into Natural Gas Distribution System	0	0	0	27,993	0.00%
E - Industrial or Large Commercial Hydrogen and Carbon Capture Incentives	0	0	0	107,196	0.00%
F - Industrial Methane and Refrigerant Leak Reduction	0	0	0	33,763	0.00%
G - Urban Tree Carbon Offsets	0	0	0	4,500	0.00%
H - Carbon Capture Rebates for Commercial Buildings	0	0	0	23,757	0.00%
I - New Networked Geothermal Systems	0	0	0	107,355	0.00%
J - Decarbonizing Existing District Energy Systems	0	0	0	124,030	0.00%
K - New District Energy System	0	0	0	40,882	0.00%

(Continued on next page)

⁸ Petition at 6-7.

Pilot	Estimated Lifecycle GHG Reductions (Metric Tons of CO2e from 2024)	Estimated Lifecycle GHG Reductions (Metric Tons CO2e) from Prior Plan Years	Total Cumulative GHG Reductions (Metric Tons CO2e) from Plan as of end of 2024	Estimated Lifecycle GHG Reductions (Metric Tons CO2e) in Approved Plan	Percentage Achieved GHG Reductions to Estimate
L - Industrial Electrification Incentive	0	0	0	11,896	0.00%
M - Commercial Hybrid Heating	0	0	0	25,609	0.00%
N - Residential Deep Energy Retrofits and Electric Air Source Heat Pumps	0	0	0	66,760	0.00%
O - Small/Medium Business GHG Audit	0	0	0	4,380	0.00%
P - Residential Gas Heat Pumps	0	0	0	235	0.00%
Q - Gas Heat Pumps for Commercial Buildings	0	0	0	2,154	0.00%
R - Industrial and Large Commercial GHG Audit Pilot	0	0	0	35,560	0.00%
R&D Pilots	0	0	0	0	0.00%
Total	0	0	0	1,131,618	0.00%

The Company reports spending for 2024 related to the NGIA pilots. Overall, the Company reported spending about 2.81% of the overall approve 5-year NGIA budget during 2024, or about \$2,687,032 of the approve \$105,701,516 budget. Table 2 below provides the Company's reported spending by pilot.

Table 2: CenterPoint NGIA Spending by Pilot⁹

Pilot	2024 Cost Counting Against NGIA Budget	Prior Plan Year Costs Counting Against NGIA Budget	Total Costs Counting Against Budget in Plan	Approved 5-Year Budget	Percent Budget Spent
B - RNG Produced from Ramsey & Washington Counties Organic Waste	\$191,163	\$0	\$191,163	\$6,520,485	2.93%
C - Renewable Natural Gas RFP Purchase	\$1,090,048	\$0	\$1,090,048	\$40,271,426	2.71%
D - Green Hydrogen Blending into Natural Gas Distribution System	\$120,855	\$0	\$120,855	\$4,646,943	2.60%
E - Industrial or Large Commercial Hydrogen and Carbon Capture Incentives	\$98,999	\$0	\$98,999	\$3,793,912	2.61%
F - Industrial Methane and Refrigerant Leak Reduction	\$37,349	\$0	\$37,349	\$1,247,828	2.99%
G - Urban Tree Carbon Offsets	\$10,230	\$0	\$10,230	\$329,301	3.11%
H - Carbon Capture Rebates for Commercial Buildings	\$17,483	\$0	\$17,483	\$612,377	2.85%
I - New Networked Geothermal Systems	\$342,693	\$0	\$342,693	\$11,625,947	2.95%
J - Decarbonizing Existing District Energy Systems	\$50,720	\$0	\$50,720	\$598,794	8.47%
K - New District Energy System	\$10,903	\$0	\$10,903	\$215,644	5.06%

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⁹ Petition at 7-8.

Pilot	2024 Cost Counting Against NGIA Budget	Prior Plan Year Costs Counting Against NGIA Budget	Total Costs Counting Against Budget in Plan	Approved 5- Year Budget	Percent Budget Spent
L - Industrial Electrification Incentive	\$14,717	\$0	\$14,717	\$504,436	2.92%
M - Commercial Hybrid Heating	\$186,487	\$0	\$186,487	\$7,068,602	2.64%
N - Residential Deep Energy Retrofits and Electric Air Source Heat Pumps	\$361,454	\$0	\$361,454	\$13,617,633	2.65%
O - Small/Medium Business GHG Audit	\$68,715	\$0	\$68,715	\$1,997,007	3.44%
P - Residential Gas Heat Pumps	\$11,548	\$0	\$11,548	\$380,761	3.03%
Q - Gas Heat Pumps for Commercial Buildings	\$20,995	\$0	\$20,995	\$749,464	2.80%
R - Industrial and Large Commercial GHG Audit Pilot	\$36,751	\$0	\$36,751	\$950,494	3.87%
Total (Pilots Only)	\$2,671,110	\$0	\$2,671,110	\$95,131,054	2.81%
R&D Pilots	\$15,922	\$0	\$15,922	\$10,570,462	0.15%
Total	\$2,687,032	\$0	\$2,687,032	\$105,701,516	2.54%

The Department reviewed the Company's reported spending and concludes that it appears to be reasonable. Despite not achieving any energy savings during 2024, these pilots require work, and thus expenditures prior to being able to achieve savings.

The Company also reported data on pilot participation; however, as the pilots have yet to achieve any savings they have no participants to date. The Department will review and analyze participation data in future annual NGIA reports.

A.2. Workforce Development and Diversity

The NGIA requires CenterPoint to report and discuss the economic impacts of the NGIA plan, including job creation. As part of one of CenterPoint's cost-effectiveness objectives, the Company proposed to track workforce development spending. For 2024 the Company reported spending \$25,922 on external vendors for pilot implementation and reported that \$5,000 of this amount was spend on diverse vendors, or approximately 19% of vendor spending. The Company did not explain how it determined that vendors were diverse, or how it defines diverse vendors. The Department requests

that the Company explain in reply comments what it defines as a diverse vendor and how it makes this determination.¹⁰

A.3. Inflation Reduction Act Updates

The NGIA Order required the Company to provide updates on Inflation Reduction Act (IRA) implementation. The Company provided updates related to several pilots

A.3.1. Pilot D: Green Hydrogen Blending Into Natural Gas Distribution System

CenterPoint reported that Pilot D could qualify for a 6-50% Investment Tax Credit (ITC), dependent on certain labor and domestic manufacturing requirements. Alternatively, the pilot could potentially use Production Tax Credits (PTCs) in the range of \$0.60 to \$3.00/kg of hydrogen production. The Company reported that final Treasury guidance for the PTCs for hydrogen blending became effective as of January 10, 2025. CenterPoint summarized this guidance as:¹¹

The Final Guidance extends the annual matching temporal matching requirement, that the electricity generated in the same hour as the hydrogen facility uses electricity to produce hydrogen, from 2028 to 2030. Annual matching is allowed until then to meet the clean power time matching requirements. New clean power requirements, which apply to clean hydrogen produced via purchased electricity with up to 4 kilograms of carbon dioxide equivalents per kilogram of hydrogen production, require the electricity generation for the power-to-hydrogen facility to begin commercial operations within 36 months of the hydrogen facility being placed into service.

The Company indicated that it is exploring the feasibility of entering into a power purchase agreement for a generator coming online within 3 years for the pilot to satisfy the requirements of the PTC.

A.3.2. Pilot I: New Networked Geothermal System

The Company stated that Pilot I may also qualify for ITCs under new December 12, 2024 Treasury guidance related to the interpretation of ownership of energy property that implies separate ownership components would be allowed to claim the credit.¹²

A.3.3. Pilots B and C: Renewable Natural Gas (RNG) Purchase Pilots

CenterPoint stated that several RNG projects being considered by the Company would be eligible for ITCs. CenterPoint expects to be able to track these benefits with information provided by RNG

¹⁰ Petition, at 14.

¹¹ *Id.*, at 15.

¹² *Ibid.*

producers.¹³ The Department requests the Company provide additional information in future reports on the success of obtaining ITCs for RNG projects, and any information the Company has at that time on the estimated impacts to the costs for the Company and rate payers of those ITCs.

A.3.4. Other

Finally, the Company reports that other pilots may be eligible, to some extent, for tax credits. However, those credits would likely be payable directly to the participant, rather than the Company, and might be difficult to track, such as the IRA Home Efficiency Rebate program.

A.4. Proposed Plan Modifications

The Company did not propose any plan modifications in the Petition. However, the Company did report meeting with the Department of Agriculture in September 2024 for a discussion of RNG topics as required by the NGIA Order, with the purpose of eventually proposing an R&D project exploring incentives to encourage Minnesota small family farms to participate in RNG markets. The Company indicated that it expects to propose the R&D project before or as part of its next annual report.¹⁴

A.5. Individual Pilot Performance

The Company provided a section discussing the performance of each of its pilot program. However, as discussed above, the Company only just began implementation of its pilots and did not achieve any GHG savings in 2024. As such the Company's report largely consists of describing the pilots, reporting the above referenced spending, and indicating that no GHG savings were achieved. As such the Department will not provide an analysis of each pilot at this time but will review pilot performance in future annual reports.¹⁵

A.6. R&D Pilot Performance

Similar to the Company's report on pilot performance, the Company largely reported that work has yet to begin on the majority of R&D pilots. However, for the RNG potential study, the Company reported that the Agricultural Utilization Research Institute (AURI) began preliminary technoeconomic analysis in three geographic areas for a cost of \$15,922 in 2024. As work this is just preliminary, there is no output or learnings to analyze at this time.¹⁶

A.7. Budget Flexibility

The NGIA Order requires that if any pilot budget increases by over 25 percent of the total five-year pilot budget to go through the annual review process or through separate comments for review by the Commission. The Company indicated no pilot's funding has exceeded 25 percent of the total five-

¹³ *Ibid.*

¹⁴ *Id.*, at 16.

¹⁵ *Id.*, at 16-37

¹⁶ *Id.*, at 37-39

year budget at this time, so this requirement is not applicable in this annual report. Furthermore, the Company indicated that it did not exercise any budget flexibility options in 2024.¹⁷

A.8. NGIA Performance Objectives

The Company provided a discussion of the progress it is making toward each of its Cost Effectiveness Objectives as approved by the Commission in the NGIA Order. However, as no GHG savings have been achieved and no pilots have been modified, there is very little information on progress at this time beyond the statement that pilots are in preliminary stages of being implemented.¹⁸ Therefore, the Department does not provide a detailed analysis of the Company's efforts to meet the NGIA Performance Objectives at this time, but will provide analysis in response to future annual reports.

B. NGIA COST RECOVERY

The NGIA Order allows the Company to recover costs associated with the NGIA plan implementation through the Company's Purchased Gas Adjustment (PGA) mechanism, through rate case implemented base rate with the Innovation Act Charge (IAC), and through a rider with an annual true up named the Innovation Act Adjustment (IAA). The Department provides a review of the reported recoveries through these mechanisms below.

B.1. Purchase Gas Adjustment

The NGIA Order allows the recovery of eligible expenses through the PGA mechanism. As the PGA is used to recover fuel costs, and no pilot has progressed to the point where RNG or another fuel has been purchased by the Company, CenterPoint reported no recovery of NGIA costs through the PGA for 2024. The Department reviewed the provided information and concluded that this status is correct and reasonable.¹⁹

B.2. Innovation Act Charge

CenterPoint's 2023 Rate Case included a proposed IAC. The Commission approved a settlement in a June 27, 2025 Order, establishing an IAC of \$0.0618 per DTCH for commercial and industrial customers (C&I) and a \$0.0360²⁰ per Dth for residential customers.²¹ The Department confirmed that costs for the NGIA were included in the 2023 Rate Case Settlement.

¹⁷ *Id.*, at 39

¹⁸ *Id.*, at 42-44

¹⁹ *Id.*, at 39-40

²⁰ *Id.*, at 40

²¹ *In the Matter of a Petition by CenterPoint Energy for Authority to increase Natural Gas Rates in Minnesota, Order Accepting Settlement Agreement*, June 27, 2025, Docket No. G008/GR-173 (eDockets) [20256-220411-01](#), (hereinafter "2023 Rate Case Settlement").

B.3. Innovation Act Adjustment

The IAA is intended to recover the remaining costs of the Company's NGIA spending not captured either in the PGA or the IAC. For the purposes of setting an IAA the Company has assumed that its approved IAC will begin recovery in September 2025. The IAA would go into effect upon Commission approval and for the purposes of this proposal the Company has assumed a date of January 2026, which would require Commission action by November 1, 2025. The Company indicated that in the event of a different order date the Company may recalculate the IAA using the same purposed method but with updated cost and revenue information.

B.3.1. 2024 Tracker Balance

The Company's tracker balance at the end of 2024 is presented in Table 3 below. The overall balance includes both NGIA spending and carrying charges using the Company's cost of short-term debt approved in the Company's most recent rate case. This is consistent with the how carrying charges are handled in other trackers, such as the Company's ECO tracker.

Table 3: NGIA Tracker Balance²²

January 1, 2024 NGIA Tracker Balance	\$703,834
2024 NGIA Spending	\$1,106,670
2024 Carrying Charges	\$3,542
December 31, 2024 NGIA Tracker Balance	\$1,814,046

The Department confirmed the calculation of the Company's 2024 NGIA tracker balance.

B.3.2. Proposed IAA Rate

To calculate the Company's proposed IAA rate, CenterPoint forecast spending for the remainder of 2025 and for 2026, and assumed the IAC implementation date of September 2025 and the IAA implementation date of January 2026. The Company then set rates to, as closely as possible, recover all NGIA costs and bring the 2025 ending balance as close to zero as possible. The Company also balanced the specific costs assigned to specific classes, as some NGIA pilots costs were only attributable to C&I customers or residential customers. The Company proposed a general IAA rate for all classes of \$.0200 per Dth, a residential rate of \$.0437 per Dth, and a C&I rate of \$.0799. This IAA rate proposal results in effective rates for residential customers of \$.0636 per Dth and \$.0998 per Dth for C&I customers. The Department reviewed the Company's calculations and confirmed that the proposed rates reduce the balance to near zero by the end of 2026. Further, the Department confirmed that the proposed rates for different classes closely recover the overall costs for each class, which ensures that the correct customers classes are paying the correct portions of NGIA costs. Table 4 below provides estimated impact of the Company's proposed IAA rates.²³

²² Petition Exhibit D

²³ Petition at 41-42.

Table 4: Projected 2026 NGIA Tracker Balance with Proposed IAA Rates²⁴

2024 Tracker Balance	\$1,814,046
2025 Estimated NGIA Spending	\$8,080,084
2025 Estimated IAC Recovery	\$4,282,554
2025 Estimated NGIA Carrying Charges	\$80,499
2025 Projected Tracker Balance	\$5,692,075
2026 Estimated NGIA Spending	\$14,962,447
2026 Estimated Recovery	\$20,659,241
2026 Estimated NGIA Carrying Charges	\$6,888
2026 Projected Tracker Balance	\$2,168

Based on this review, the Department concludes that the Company's proposed IAA rates are reasonable and recommends Commission approval.

B.3.3. Proposed Bill Message

The Company proposed to inform customers of the rate change with the following bill message language:²⁵

The PUC has approved an Innovation Act Adjustment (IAA) factor of \$0.00998 per therm for C&I customers and \$0.00636 per therm for Residential customers. This charge will be used to fund innovative decarbonization activities and has been added to your delivery charge. For more information, please call or visit our website.

The Department reviewed the proposed bill message language, finds it to be reasonable, and recommends Commission approval.

C. COMMISSION NOTICE OF COMMENT PERIOD QUESTIONS

The Department provides responses to the Commission's NOC questions below. As several questions cover similar topics the Department has broken this section into the following sections:

- What Action's should the Commission take with respect to CenterPoint NGIA Plan
- Federal Law and Tax Policy Impacts
- Innovation Act Adjustment Rider
- Other

C.1. What Action's should the Commission take with respect to CenterPoint NGIA Plan

The Commission requested parties to comment on if the Commission should approve the continuation of CenterPoint's NGIA plan, if any modifications to Pilots or R&D projects should be

²⁴ Petition Exhibit E

²⁵ Petition at 42.

required, and if any pilots or R&D projects should be discontinued. As discussed above, the NGIA Order only implemented the Company's NGIA plan for a little over two months of 2024 and the Company has yet to achieve any GHG savings under the plan. As such the Department believes it would be premature to make any changes to the Company's NGIA plan. The Department will review other parties' comments on this matter, but believes that there is not sufficient additional data beyond what was considered by the Commission when it made its decisions in the NGIA Order to determine if any pilots or R&D projects need to be modified or discontinued.

Therefore, the Department recommends for now that the Commission approve the continuation of CenterPoint's NGIA Plan with no modifications.

C.2. Federal Law and Tax Policy Impacts

As discussed above CenterPoint provided updates on the eligibility of certain pilots for IRA funding. These updates largely served to better define what tax credits pilots would be eligible for. The Department notes, however, that the status of IRA funding is unclear. It is unclear what portion of IRA funding will be paid out for programs, even if those tax credits have not specifically been cancelled by some other act or order. The Department requests that the Company provide further updates on the impacts of federal law and tax policy changes on its proposed NGIA pilot programs as the Company learns of changes.

C.3. Innovation Act Adjustment Rider

As discussed above, the Department recommends approval of the Company's proposed IAA Rider. However, the Commission also asked whether future rider adjustments should be filed in a separate docket going forward in order to prevent delays. The Company filed its annual report on May 30, 2025, a full 7 months before its proposed IAA implementation date of January 1, 2026. The Commission must weigh whether the likely complicated process for future NGIA Annual filings—once more data is available—if it believes that will be enough time for future comment periods. Separating the annual report from the IAA rider update would simplify matters for the IAA rider to some extent but potentially introduce other challenges or require out of cycle updates.

Specifically, any changes the Commission makes to the Company's NGIA plan in future annual filings will result in changes to the total NGIA costs. Since the IAA rider uses a forecast of cost to set its rate, any changes to the total NGIA costs will cause that forecast to change. If the Commission chooses to have future IAA rider updates be filed in a separate docket, then any changes to the NGIA plan resulting in cost changes would not be addressed in the same filing, meaning that the IAA rate would no longer be set to minimize the IAA balance, resulting in likely over- or under-recoveries. Over- or under-recovery of the IAA, however, is not necessarily a deal breaker, as the IAA rider includes carrying charges, so either the Company or Ratepayers would be made whole in case of a over- or under-recovery. The same impact could be felt if the IAA rider updates remain in the Company's annual filing and face delays due to other discussions. As such there are risks regardless of what action the Commission takes.

As the IAA rider updates are more of a administrative item and delays could cause additional issues, the Department believes that placing IAA rider updates in a separate docket would be reasonable and likely more efficient, with the caveat that the Commission may wish to order an out-of-cycle update if large changes are made to the Company's NGIA plan in the annual filing docket. Therefore, the Department recommends that the Commission require the Company to file future IAA rider updates in a separate filing.

C.4. Other

Finally, the Commission requested that parties indicate if there are any other issues or concerns related to this matter. The Department does not have any other issues at this time, but will monitor the comments of other parties in this proceeding.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the Petition and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. NGIA ANNUAL REPORT

- A.2 The Department requests that the Company explain in reply comments what it defines as a diverse vendor and how it makes this determination.

B. NGIA COST RECOVERY

- B.3.2 the Department concludes that the Company's proposed IAA rates are reasonable and recommends Commission approval.
- B.3.3 The Department reviewed the proposed bill message language and finds it to be reasonable and recommends Commission approval.

C. COMMISSION NOTICE OF COMMENT PERIOD QUESTIONS

- C.1. The Department recommends that the Commission approve the continuation of CenterPoint's NGIA Plan with no modifications.
- C.2 The Department requests that the Company provide further updates on the impacts of federal law and tax policy changes on its proposed NGIA pilot programs as the Company learns of changes.
- C.3. The Department recommends that the Commission require the Company to file future IAA rider updates in a separate filing.

Attachments

CERTIFICATE OF SERVICE

I, Nicole Westling, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. G008/M-23-215

Dated this **28th** day of **July 2025**

/s/Nicole Westling

#	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	23-215Official
2	Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource		15669 WATERLOO CIR TRUCKEE CA, 96161 United States	Electronic Service		No	23-215Official
3	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	23-215Official
4	Abby	Alter	aalter@rmi.org			2490 Junction Place Ste 200 Boulder CO, 80301 United States	Electronic Service		No	23-215Official
5	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	23-215Official
6	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official
7	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	23-215Official
8	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall FI 5 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
9	Michael J	Auger	michael.auger@ever-greenenergy.com	Ever-Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	23-215Official
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	23-215Official
11	Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	23-215Official
12	Randall	Beck	rbeck3@wm.com	Waste Management Renewable Energy, L.L.C.		1021 Main St Houston TX, 77002 United States	Electronic Service		No	23-215Official
13	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	23-215Official
15	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
16	Sherri	Billimoria	sbillimoria@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-215Official
17	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
18	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	23-215Official
19	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-215Official
20	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	23-215Official
21	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	23-215Official
22	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	23-215Official
23	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	23-215Official
24	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
25	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	23-215Official
26	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	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
27	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	23-215Official
28	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	23-215Official
29	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	23-215Official
30	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	23-215Official
31	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	23-215Official
32	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-215Official
33	Joseph	Dammel	dammel@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 St. Paul MN, 55102 United States	Electronic Service		No	23-215Official
34	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
35	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
36	Ryan	Dougherty	ryan@geoexchange.org	Geothermal Exchange Organization		312 S 4th St Ste 100 SPRINGFIELD IL, 62701 United States	Electronic Service		No	23-215Official
37	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	23-215Official
38	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-215Official
39	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55406 United States				
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	23-215Official
41	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	23-215Official
42	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	23-215Official
43	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	23-215Official
44	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	23-215Official
45	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	23-215Official
46	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	23-215Official
47	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
48	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-215Official
49	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	23-215Official
50	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-215Official
51	Mike	Henchen	mhenchen@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-215Official
52	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						St.Paul MN, 55101 United States				
53	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	23-215Official
54	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	23-215Official
55	Emma	Ingebretson	emma.ingebretsen@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall PO Box 59038 Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
56	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	23-215Official
57	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	23-215Official
58	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23-215Official
59	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
60	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
61	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	23-215Official
62	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	23-215Official
63	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	23-215Official
64	D	Kalmon	dkalmon@mwmo.org	Mississippi Watershed Management Organization		2522 Marshall St NE Minneapolis MN, 55418-3329 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
65	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23-215Official
66	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
67	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	23-215Official
68	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
69	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official
70	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	23-215Official
71	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
72	Betsy	Lang	betsy.lang@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Ave Mall, 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
73	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-215Official
74	Samuel	Lehr	sam.lehr@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L St #513 Sacramento CA, 95814 United States	Electronic Service		No	23-215Official
75	Robert	Lems	administration@dmr-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	23-215Official
76	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
77	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	23-215Official
78	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-215Official
79	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	23-215Official
80	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
81	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-215Official
82	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
83	Nicholas	Martin	nicholas.f.martin@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th floor Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
84	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	23-215Official
85	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
86	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	23-215Official
87	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-215Official
88	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
89	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	23-215Official
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	23-215Official
91	Ana Sophia	Mifsud	amifsud@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-215Official
92	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-215Official
93	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-215Official
94	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
95	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	23-215Official
96	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-215Official
97	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
98	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
99	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	23-215Official
100	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	23-215Official
101	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
102	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	23-215Official
103	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-215Official
104	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-215Official
105	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	23-215Official
106	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	23-215Official
107	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	23-215Official
108	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
109	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	23-215Official
110	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-215Official
111	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-215Official
112	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul MN, 55102 United States	Electronic Service		No	23-215Official
113	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities	1400 BRM Tower 445 Minnesota St St. Paul MN,	Electronic Service		Yes	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Division	55101-2131 United States				
114	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	23-215Official
115	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-215Official
116	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	23-215Official
117	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	23-215Official
118	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
119	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	23-215Official
120	Rebecca	Schultz	rebecca.schultz@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
121	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-215Official
122	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-215Official
123	Patrick	Serfass	pserfass@ttcorp.com	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	23-215Official
124	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
125	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	23-215Official
126	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	23-215Official
127	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	23-215Official
128	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-215Official
129	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-215Official
130	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-215Official
131	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-215Official
132	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-215Official
133	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
134	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
135	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
136	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	23-215Official

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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
137	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
138	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
139	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	23-215Official
140	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
141	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	23-215Official
142	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-215Official
143	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L Street #513 Sacramento CA, 95814 United States	Electronic Service		No	23-215Official
144	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	23-215Official
145	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	23-215Official
146	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	23-215Official
147	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
148	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-215Official
149	Donald	Wynia	donald.wynia@centerpointenergy.com	CenterPoint Energy		CenterPoint Energy 505 Nicollet Mall	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55402 United States				
150	Grant	Zimmerman	gzimmerman@ampamericas.com	Amp Americas		811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States	Electronic Service		No	23-215Official
151	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-215Official
152	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official