

September 9, 2025

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

RE: Supplemental Comments of the Minnesota Department of Commerce  
Docket No. G999/CI-21-565

Dear Mr. Bull:

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

*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 was initiated by the Minnesota Public Utilities Commission (Commission) on July 23, 2021.

The Department recommends **eliminating the free footage allowance** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

MZ/ad  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce

Docket No. G999/CI-21-565

#### I. INTRODUCTION

The Legislature enacted the Natural Gas Innovation Act (NGIA or the Act) in 2021.<sup>1</sup> Article 8, Section 27, directs the Minnesota Public Utilities Commission (Commission), by August 1, 2021, to initiate a proceeding to evaluate changes to natural gas utility regulatory and policy structures needed to meet or exceed Minnesota’s greenhouse gas emissions reductions goals. On July 23, 2021, the Commission established this docket to address those concerns.<sup>2</sup> The Natural Gas Innovation Act also requires that by June 1, 2022, the Commission issue an order establishing a framework to calculate lifecycle greenhouse gas emissions intensities of each innovative resource.<sup>3</sup> The Commission opened a second proceeding to develop the framework in Docket No. G999/CI-21-566.<sup>4</sup>

On May 5, 2025 the Commission issued a Notice of Comment Period requesting comments related to the free footage allowances for extensions offered by the states regulated gas utilities.<sup>5</sup> In response to this notice numerous parties filed initial comments on July 8, 2025 and Reply comments on August 8, 2025.

In response to the Commission’s Notice of Comment Period the Minnesota Department of Commerce, Division of Energy Resources (Department) filed comments discussing the origins of the free footage allowance, showing the Minnesota Statutes show a clear preference for reducing natural gas usage and greenhouse gas emissions, discussing several studies, and providing data on lessons from proceedings in other states.<sup>6</sup> The Department concluded by recommending that the Commission eliminate the free footage allowances for all Minnesota gas utilities. In these supplemental comments the Department responds to various parties regarding the impacts of eliminating the free footage allowance on the potential for a dual fuel future for Minnesota, impacts on housing costs, likely changes to the overall

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<sup>1</sup> Minnesota Laws 2021, 1st Special Session, ch. 4, art. 8, §§ 20-21, 27. Minn. Stat. § 216B.2427.

<sup>2</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*.

<sup>3</sup> Minn. Stat. § 216B.2428.

<sup>4</sup> *In the Matter of Establishing Frameworks to Compare Lifecycle Greenhouse Gas Emissions Intensities of Various Resources, and to Measure Cost-Effectiveness of Individual Resources and of Overall Innovative Plans*. Also See the Commission’s *Notice of Stakeholder Engagement Timeline and Docket Process*, April 11, 2023, Docket Nos. G999/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [20234-194673-01](#).

<sup>5</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, Notice of Comment Period, May 5, 2025, Docket No. G999/CI-21-565, (eDockets) [20255-218596-01](#), (hereinafter “Commission Notice”).

<sup>6</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, Department, Comments, July 8, 2025, Docket No. G999/CI-21-565, (eDockets) [20257-220725-01](#) (hereinafter “Department Initial Comments”).

usage of natural gas, studies provided by other parties, heat pump uptake rates, and a public comment. The Department maintains its position that the Commission should eliminate the free footage allowance for all Minnesota gas utilities.

## II. PROCEDURAL BACKGROUND

- January 17, 2025 The Commission posted a Notice of Current Scope of Docket and Timeline to bring attention back to the specific issues identified for consideration in the Future of Gas Docket or the instant docket. The Commission explained that subject to change, it would issue a Notice of Comment Period on Line Extension Policy Issues in March 2025.<sup>7</sup>
- May 5, 2025 The Commission posted a notice of comment period.<sup>8</sup>
- May 12, 2025 The Commission posted a notice of comment period, fixing the broken links in the May 5, 2025 Notice.<sup>9</sup>
- July 8, 2025 Department files initial comments with the Commission recommending elimination of the free footage allowance for all Minnesota gas utilities.  
<sup>10</sup>
- August 8, 2025 Numerous parties file Reply Comments. In these comments the Department specifically replies to or discusses the comments of LIUNA Minnesota and North Dakota (LIUNA),<sup>11</sup> Housing First,<sup>12</sup> the Coalition of Greater Minnesota Cities,<sup>13</sup> Fresh Energy,<sup>14</sup> Center for

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<sup>7</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, Notice of Current Scope of Docket and Timeline, January 17, 2025, Docket No. G999/CI-21-565, (eDockets) [20251-214100-01](#).

<sup>8</sup> Commission Notice

<sup>9</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, Notice of Comment Period, May 5, 2025, Docket No. G999/CI-21-565, (eDockets) [20255-218789-01](#)

<sup>10</sup> Department Initial Comments

<sup>11</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, LIUNA, Reply Comments, August 11, 2025, Docket No. G999/CI-21-565, (eDockets) [20258-221924-01](#) (hereinafter “LIUNA’s Reply Comments”).

<sup>12</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, Housing First, Reply Comments, August 11, 2025, Docket No. G999/CI-21-565, (eDockets) [20258-221961-01](#) (hereinafter “Housing First’s Reply Comments”).

<sup>13</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, Coalition of Greater Minnesota Cities, Reply Comments, August 6, 2025, Docket No. G999/CI-21-565, (eDockets) [20258-221839-01](#) (hereinafter “Coalition of Greater Minnesota Cities’ Reply Comments”).

<sup>14</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, Fresh Energy, Comments, August 8, 2025, Docket No. G999/CI-21-565, (eDockets) [20258-221920-01](#) (hereinafter “Fresh Energy’s Reply Comments”) at 7-9.

Energy and the Environment (CEE),<sup>15</sup> the Office of the Attorney General – Residential Utilities Division (OAG),<sup>16</sup> Xcel Energy,<sup>17</sup> CenterPoint Energy,<sup>18</sup> Great Plains Natural Gas Co (Great Plains),<sup>19</sup> and Minnesota Energy Resources Company (MERC).<sup>20</sup>

Topic(s) open for comment:

- Should the Commission consider any modifications to how gas utilities calculate free footage allowance and other costs related to gas main and service line extensions? If so, what factors or conditions would justify changes? And how would any proposed changes affect new connecting customers and other ratepayers?
- If the Commission should make modifications to regulated gas utilities' gas line extension policies, how would rules, statutes, and Commission orders justify those modifications?
- Which proposed modifications, if any, would necessitate gas utilities to coordinate and/or consult with electric utilities in the service territory where a gas line extension is being contemplated?
- How should the Commission consider the results of Minnesota Energy Resource Corporation's [Line Extension Policy Study](#) in this matter?
- What lessons should the Commission consider from proceedings in other states related to this matter?
- Should any distinctions be made between different customer classes when considering modifications?
- How should the Commission consider the needs of low-income customers and other areas of equity in this matter?
- Are there other issues or concerns related to this matter?

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<sup>15</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, CEE, Reply Comments, August 8, 2025, Docket No. G999/CI-21-565, (eDockets) [20258-221919-01](#) (hereinafter "CEE's Reply Comments") at 2.

<sup>16</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, Office of the Attorney General – Residential Utilities Division, Reply Comments, August 8, 2025, Docket No. G999/CI-21-565, (eDockets) [20258-221889-02](#) (hereinafter OAG's Reply Comments") at 1-4.

<sup>17</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, Xcel Energy, Reply Comments, August 8, 2025, Docket No. G999/CI-21-565, (eDockets) [20258-221904-02](#) (hereinafter "Xcel Energy's Reply Comments")

<sup>18</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, CenterPoint Energy, Reply Comments, August 8, 2025, Docket No. G999/CI-21-565, (eDockets) [20258-221911-01](#) (hereinafter "CenterPoint Energy's Reply Comments")

<sup>19</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, Great Plains Natural Gas Co, Reply Comments, August 8, 2025, Docket No. G999/CI-21-565, (eDockets) [20258-221917-01](#) (hereinafter Great Plains' Reply Comments")

<sup>20</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, Minnesota Energy Resources Company, Reply Comments, August 8, 2025, Docket No. G999/CI-21-565, (eDockets) [20258-221900-01](#) (hereinafter MERC's Reply Comments")

The Department provides supplemental comments below in response to other parties August 8, 2025 reply comments.

### III. DEPARTMENT ANALYSIS

Several parties provided responses to the Department's recommendations and analysis. The Department provides responses to LIUNA, Housing First, the Coalition of Greater Minnesota Cities, and several of natural gas utilities that provided responses on similar topics. Additionally, the Department discusses a study provided by CEE on electrifying space heating in Quebec, Canada. Finally, the Department provides some additional data showing evidence of increased uptake of electric heat pumps and highlights one public comment that compares a similar service and how Minnesota Statutes treat it. The Department also reviewed the comments of all other parties and believes that parties are developing a robust record for the Commission to consider.

#### A. RESPONSE TO LIUNA

In its August 11, 2025 reply comments, LIUNA Minnesota and North Dakota took issue with a number of the Department's positions, or perceived positions.<sup>21</sup> The Department disagrees with LIUNA's positions or interpretations of the Department's positions and responds in this section.

First, the Department clarifies that its recommendation in this docket is only to remove the free footage allowance—not to disallow service extensions or to directly incentivize electric space heating. While the Department supports electric space heating, the Department makes no recommendations to the Commission of this sort here, as it is outside the scope of this discussion. The Department instead notes that the current systems in place, including the free footage allowance, actively incentivizes natural gas expansion. Furthermore, elimination of the free footage allowance does not prevent Minnesotans from choosing to pursue a dual fuel future. The Department's brief reference to the CEE and Great Plains Institute study<sup>22</sup> was simply to demonstrate that a future with no line extensions would, in time, result in a drop in overall natural gas usage.

LIUNA also points out that 15 percent of Minnesota households that use delivered fuels<sup>23</sup> for heating, with the implication that removal of the free footage extension would prevent these customers from receiving natural gas service, and that natural gas is far cleaner than the fuels they are currently using. While natural gas is indeed cleaner than the other delivered fuels, as discussed in great detail in Fresh Energy's reply comments,<sup>24</sup> this analysis completely ignores why these customers might be using alternative fuels. Indeed, LIUNA's Reply Comments even hint at the answer by noting that 13 to 18

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<sup>21</sup> LIUNA's Reply Comments

<sup>22</sup> See, Decarbonizing Minnesota's Natural Gas End Uses, Center for Energy and the Environment and Great Plains Institute, last accessed July 6, 2025 at <https://e21initiative.org/wp-content/uploads/2021/07/Decarbonizing-NG-End-Uses-Stakeholder-Process-Summary.pdf>.

<sup>23</sup> Approximately 10.5 percent use propane, 2 percent use fuel oil, and 2.4 percent use wood per LIUNA's Reply Comments.

<sup>24</sup> Fresh Energy's Reply Comments at 7-9.

percent of households in northern counties use wood as the primary heating fuel while also noting that delivered fuels cost roughly three times more than natural gas.<sup>25</sup> The most likely reason for the use of alternative fuels in these areas is that natural gas service is simply not available there. The price factor alone should serve as a large motivator to switch to natural gas service—if it were available.

Minn. Stat. § 216B.1638 allows the extension of natural gas service to unserved areas and the establishment of a new area surcharge to recover the costs of the expansion. Despite this allowance some areas of the state are yet unserved by natural gas, because it would simply not be cost effective for new customers. Even in a dual fuel future, these customers would likely continue to use their current delivered fuel as a backup instead of natural gas. A 2018 study found that, at the time, interstate pipelines cost about \$214,000 per mile per inch of diameter; this high price point increased the level of demand necessary to justify expansion, even with less costly distribution lines.<sup>26</sup> Further, in a future where natural gas is the backup heat source, we would expect natural gas usage to drop compared to scenarios where it is the primary heat source, and the price per unit to therefore increase to pay for the infrastructure. To expand the system to these areas while also experiencing usage drops would only serve to exacerbate this issue. Simply put, it is unlikely that natural gas service will expand to many of these areas because it is simply not cost effective for the utilities to do so—and the continuation of the free footage allowance is unlikely to overturn this economic fact.

Finally, LIUNA also discusses the impacts of the free footage allowance on the costs of new house construction. As several other parties also discussed this issue, the Department will instead respond to that discussion below.

*B. RESPONSE TO HOUSING FIRST AND THE COALITION OF GREATER MINNESOTA CITIES*

In addition to LIUNA, both Housing First<sup>27</sup> and the Coalition of Greater Minnesota Cities<sup>28</sup> submitted reply comments that address the potential impact of the elimination of the free footage allowance on housing prices. The Coalition of Greater Minnesota Cities states that, according to a survey of its member cities, Greater Minnesota is facing a housing market failure, with the cost of housing construction being higher than what new construction can be sold or rented for, and that removing the free footage allowance will serve to worsen this issue.<sup>29</sup> Housing First similarly states that the line extension costs could be significant for construction in suburban and rural developments and could exacerbate the issue of a shortage of attainable homes for first-time and moderate-income buyers.<sup>30</sup>

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<sup>25</sup> LIUNA Reply Comments at 5.

<sup>26</sup> *Information Brief*, Research Department of the Minnesota House of Representatives, November 2018, <https://www.house.mn.gov/hrd/pubs/natgasmn.pdf>

<sup>27</sup> Housing First's Reply Comments

<sup>28</sup> Coalition of Greater Minnesota Cities' Reply Comments

<sup>29</sup> Coalition of Greater Minnesota Cities' Reply Comments at 2

<sup>30</sup> Housing First's Reply Comments at 1-2.

While the Department notes and laments the housing market failures in rural and other areas of Minnesota, those market failures exist already under the current free footage extension. To the extent that elimination of the free footage allowance worsens this issue, it will likely be minor. As the Coalition of Greater Minnesota Cities states this is a market failure where the cost of home construction is greater than the housing price. This price mismatch implies that demand is not high enough to meet the minimum price for these homes. Fresh Energy discussed this issue in reply comments as well: housing prices are not set based on the cost of new construction, but by supply and demand.<sup>31</sup> Additionally, if new housing uses cheaper electric heating, even if it is not for the entire year (with dual fuel heat pumps), then those long-term energy savings might nonetheless lessen the energy burden on households.<sup>32</sup>

Finally, multiple parties suggest that the cost to install electric heating in new construction might be less than attempting to decarbonize later,<sup>33</sup> including Xcel Energy.<sup>34</sup> In other words, removal of the free footage allowance could possibly raise the upfront costs of construction, but it might ultimately lower the overall ownership costs to buyers.

The concern about housing affordability is a real issue, but the current costs of new housing make new construction often unaffordable for first-time or moderate-income buyers as is, with new construction homes being estimated at costing \$300,000 to \$500,000.<sup>35</sup> The Department does not disagree that the cost and availability of housing are real issues, but the marginal impact on these prices from the elimination of the free footage allowance will not change the underlying market dynamics of the housing market.

### C. RESPONSE TO NATURAL GAS UTILITIES

Four natural gas utilities filed reply comments that generally support a dual fuel future, where natural gas serves as a backup heating resource, and that opposing the elimination of the free footage allowance. Reply comments were provided by Xcel Energy,<sup>36</sup> CenterPoint Energy,<sup>37</sup> Great Plains,<sup>38</sup> and MERC.<sup>39</sup> The Department discussed the potential for a dual fuel future above—and that elimination of

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<sup>31</sup> Fresh Energy's Reply Comments at 12

<sup>32</sup> Id. at 12

<sup>33</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, CEE, Reply Comments, July 8, 2025, Docket No. G999/CI-21-565, (eDockets) [20257-220769-01](#) (hereinafter "CEE's Initial Comments") at 7-8.

<sup>34</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, Xcel Energy, Reply Comments, July 8, 2025, Docket No. G999/CI-21-565, (eDockets) [20257-220741-01](#) (hereinafter "Xcel Energy's Initial Comments") at 5.

<sup>35</sup> *How Much Does it Cost to Build a House in Minnesota in 2025?*, Aastha Sigh, July 18, 2025, <https://www.houzeo.com/blog/how-much-does-it-cost-to-build-a-house-minnesota/>

<sup>36</sup> Xcel Energy's Reply Comments

<sup>37</sup> CenterPoint Energy's Reply Comments

<sup>38</sup> Great Plains' Reply Comments

<sup>39</sup> MERC's Reply Comments

the free footage allowance does not prevent Minnesotans from installing dual-fuel heat systems. The Department responds to several other issues raised by these utilities below.

MERC<sup>40</sup> and Xcel Energy<sup>41</sup> state that existing customers benefit from the additional of new customers through the free footage allowance by spreading the costs among more customers. The Department agrees that increased volumetric sales spread fixed costs among more ratepayers, but notes that this phenomenon occurs regardless of whether the new customers pay a contribution in aid of construction (CIAC) or not. The utilities imply that the benefit to existing customers outweigh the costs of expansion and that the free footage allowance is necessary to entice new customers to join the natural gas system. However, as discussed by numerous parties, fuels other than electricity are more expensive than natural gas, so there is already an incentive to switch fuels if it is available.<sup>42</sup> While the free footage allowance potentially reduces initial cost barriers, the incentive to switch remains, regardless of the free footage allowance.

Further, multiple parties submitted comments discussing how natural gas utilities tend to underestimate the payback times<sup>43</sup> of extensions and overestimate the benefits,<sup>44</sup> or even harm existing customers.<sup>45</sup> There appear to be legitimate concerns that these benefits are far less than suggested, if they even exist at all. It is possible that payback times might lengthen when electric heating becomes more commonly used and natural gas consumption begins to fall, in which case the cost per unit of natural gas will rise to cover the costs of natural gas infrastructure. This scenario will impact all customers and disincentivize other customers to connect to the natural gas system.

Xcel Energy highlights the potential impact on low-income customers of the removal of the free footage allowance, which it argues creates an additional barrier for these customers to switch heating methods.<sup>46</sup> The Department agrees that this barrier is a concern, however, it is likely that even the cost of converting heating equipment—ignoring the costs of a service extension—is likely too expensive for many low income customers. Moreover, because many low-income ratepayers rent rather than own their homes, the decision to switch to natural gas service may not even be many low-income households' to make.<sup>47</sup> A Minnesota Housing Partnership report found that, in 2024, 80 percent of low-income MN residents and 20 percent of home owners were cost-burdened, which is defined as

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<sup>40</sup> MERC's Reply Comments at 8.

<sup>41</sup> Xcel Energy's Reply Comments at 3.

<sup>42</sup> LIUNA's Reply Comments at 5.

<sup>43</sup> OAG's Reply Comments at 1-4.

<sup>44</sup> CUB's Reply Comments at 5-9.

<sup>45</sup> Fresh Energy's Reply Comments at 17 and Attachment A.

<sup>46</sup> Xcel Energy's Reply Comments at 14-15.

<sup>47</sup> *Examining Minnesota's Current Homeownership Gap*, Twin Cities Habitat for Humanity, February 2, 2024, <https://www.tchabitat.org/blog/examining-minnesotas-current-homeownership-gap>

spending more than 30 percent of income on housing costs.<sup>48</sup> These cost burdens and the landlord-tenant agency problem affect *both* connections to the gas system *and* heating electrification.

#### D. CEE AND THE HYDRO-QUEBEC STUDY

In its Reply Comments<sup>49</sup>, CEE highlights information on both electrification and dual fuel pathways. CEE explains that dual fuel applications will be essential for reducing natural gas use from an emissions and cost standpoints.<sup>50</sup>

CEE stated the following, in part:<sup>51</sup>

[...] both electrification and dual fuel pathways must be pursued simultaneously to achieve state policy goals regarding emission reductions, affordability, and reliability.

[...] In addition, CEE affirms that electrifying significant portions of the economy is critical to meeting the state's greenhouse gas emission reduction goals under Minn. Stat. § 216H.02, particularly as electric utilities decarbonize under the Carbon Free Standard provisions in Minn. Stat. § 216B.1691.

CEE also explains in its comments that, with the implementation of dual fuel systems, significant concerns about infrastructure costs and rate design arise. According to CEE, because gas infrastructure costs are largely recovered through volumetric rates that rely on natural gas sales, and because natural gas sales are expected to decline with electrification, rates experience upward pressure to recover the infrastructure costs.<sup>52</sup>

CEE addresses the challenges of declining gas sales and paying for gas infrastructure costs by describing the Hydro-Quebec/Énergir Model being implemented in Quebec.<sup>53</sup> In this model, dual fuel customers heat primarily with electricity switching automatically to natural gas based on a switchover temperature. While Hydro-Quebec is a winter peaking electric utility (Énergir is the gas distribution utility in Quebec), natural gas is expected to be used on days when the temperature is below the switchover temperature threshold.<sup>54</sup>

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<sup>48</sup> 2024 State of the State's Housing Profile with Key Minnesota Findings and Trends, Minnesota Housing Partnership, 2024, [https://mhponline.org/wp-content/uploads/2024\\_State\\_Profile\\_Findings\\_FINAL.pdf](https://mhponline.org/wp-content/uploads/2024_State_Profile_Findings_FINAL.pdf)

<sup>49</sup> CEE's Reply Comments at 2.

<sup>50</sup> CEE Reply Comments at 9.

<sup>51</sup> *Id.*, at 3-4.

<sup>52</sup> *Id.*, at 10-11.

<sup>53</sup> *Id.*, at 2, 11-20.

<sup>54</sup> *Ibid.*

The dual fuel offering was approved in two stages: the first stage of Énergir and Hydro-Quebec's dual fuel proposal was approved in May 2022; and the second stage in May 2023.<sup>55</sup> The dual fuel model requires electric space and water heating equipment to complement existing gas systems. It includes a distinct rate design structure that incentivizes electricity use above a switchover temperature (e.g., -12 or -15 degrees Celsius) and natural gas use below it.<sup>56</sup>

According to CEE, there were two phases of implementation with the first dual fuel offering available to residential customers in June 2022 and the second dual fuel offering available to "commercial and institutional" customers in November 2023.<sup>57</sup> One key aspect of this model is that Hydro-Quebec makes an annual payment to Énergir, known as the Greenhouse Gas (GHG) Contribution. This payment partially compensates Énergir for the natural gas capacity benefits it provides to Hydro-Quebec, attempts to ease the impacts on Énergir's ratepayers, and appears to reward Énergir for its role in potentially reducing GHG emissions. The payment is proportional to the customer's reduced natural gas consumption. That is, the actual "GHG Contribution" may be less if the decrease in natural gas consumption is lower than expected, or more if it is higher than expected.<sup>58</sup>

CEE also stated that with this model both utilities experience negative financial impacts. CEE stated the following:<sup>59</sup>

Under both scenarios, the financial impacts experienced by Hydro-Quebec and Énergir result in rate increases. To calculate the rate impacts, the utilities use their most recently approved revenue requirements as a baseline. The estimated net financial impact for each scenario is divided by the baseline revenue requirement to produce the percent change to the revenue requirement over time and, as a result, the impact on rates.<sup>45</sup>

As shown above in Table 2, Énergir customers are projected to experience a cumulative rate increase of 5 percent between 2022 and 2033 under the full electrification scenario, but only a 4.5 percent increase under the dual fuel scenario. Hydro-Quebec customers are projected to experience a cumulative rate increase of 3 percent under the full electrification scenario, but only a 0.9 percent increase under the dual fuel scenario.<sup>46</sup>

To summarize, rate impacts will be lower for both utilities under the dual fuel scenario, but the difference between the two scenarios is much more significant for Hydro-Quebec. Énergir will still see significant rate impacts under the dual fuel scenario despite providing essential capacity for Hydro

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<sup>55</sup> *Id.*, at 20.

<sup>56</sup> *Ibid.*

<sup>57</sup> *Ibid.*

<sup>58</sup> *Ibid.*

<sup>59</sup> CEE Reply Comments at 17-18.,

Quebec during winter peaks, which, in turn, greatly reduces Hydro-Quebec's rate impacts. [citations omitted].

CEE then goes on to describe the applicability of the model in Minnesota, noting the similarity that both Quebec and Minnesota are in cold climates with decarbonization goals.<sup>60</sup> However, CEE also goes on to describe certain key differences between Quebec and Minnesota as discussed below.

#### *D.1. Heating Sources.*

In Quebec, the vast majority of homes heat primarily with electricity, with only about 6 percent relying on heating primarily with natural gas. Whereas in Minnesota, two out of every three homes heat primarily with natural gas.<sup>61</sup> Thus, "decarbonizing building heat is therefore a smaller-scale task in Quebec than in Minnesota".

#### *D.2. Utility Ownership and Generation Sources.*

Quebec utilities also have different ownership models and generation mixes than Minnesota utilities. Hydro-Quebec is provincially owned and relies almost entirely on hydropower. Minnesota's largest utilities are investor-owned. CEE states the following:<sup>62</sup>

Hydro-Quebec is owned by the provincial government, while Minnesota's largest utilities are investor-owned. Hydro-Quebec provides about 99 percent of Quebec's hydropower, which makes up 94 percent of the province's electricity generation, creating an abundance of carbon-free electricity.<sup>66</sup> Énergir is a privately-owned company, with 81 percent of its ownership held by the Caisse de Depot et Placement du Quebec (CDPQ), which manages Quebec's pension plans, and 19 percent held by the Fonds de Solidarite FTQ, a labor investment fund.<sup>67</sup> Énergir has committed to reaching net zero emissions as a company by 2050 using renewable natural gas, energy efficiency, and the dual fuel agreement.<sup>68</sup> [citations omitted].

#### *D.3. Administrative Burden*

According to CEE, the administrative burden of coordination is lower in Quebec compared to Minnesota. CEE states the following:<sup>63</sup>

Finally, with Hydro-Quebec serving most of Quebec and Énergir providing most of the province's natural gas needs, the administrative burden of

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<sup>60</sup> CEE Reply Comments at 20-22.

<sup>61</sup> CEE Reply Comments at 22.

<sup>62</sup> *Ibid.*

<sup>63</sup> *Ibid.*

coordinating between electric and gas utilities is lower compared to that of Minnesota utilities, which sometimes overlap with many other utilities.

Note that in Minnesota not only do many electric service territories overlap with gas utilities, but also only some utilities are rate-regulated by the Commission. Thus, CEE appears to question how effective the Hydro-Quebec/Énergir Model would be if that particular model approach were to be applied to Minnesota; the Department shares that concern.

**E. ENERGY CONSERVATION AND OPTIMIZATION (ECO) HEAT PUMP DATA**

A number of parties have provided information in initial and reply comments about the growth in demand for heat pumps and related electric heating technologies in Minnesota. The Department’s ECO unit also observed this growth in its review of CenterPoint’s Natural Gas Energy Conversation and Optimization 2024 Status Report & Associated Compliance Filings<sup>64</sup> and discussed it in the Department’s Proposed Decision.<sup>65</sup> Table 1 below shows that CenterPoint’s air source heat pump rebate activity for existing homes and its Efficient Fuel Switching programs have greatly surpassed its approved goals. The high demand for these programs demonstrates that the public has a strong appetite for heating fuel switching if provided with adequate incentives.

**Table 1: CenterPoint’s 2024 ECO Heating Electrification Program Performance**

Program and Segment	Spending			Savings			Participants		
	Approved	Actual	% of Approved	Approved	Actual	% of Approved	Approved	Actual	% of Approved
Home Efficiency Rebates Program	\$476,400	\$2,700,497	567%	7,837	43,473	555%	300	1,661	554%
Efficient Fuel-Switching Market Segment Total	\$608,338	\$2,755,947	453%	8,540	43,548	510%	689	1,786	259%

**F. PUBLIC COMMENT**

The Department notes a public comment by Jason Willett, former Metropolitan Council’s Environmental Services (MCES) Finance Director, who observes that connections to the metro

<sup>64</sup> *Natural Gas Energy Conservation and Optimization 2024 Status Report & Associated Compliance Filings*, CenterPoint Energy, 2024 ECO Status Report and Associated Compliance Filings, May 1, 2025, Docket No. G008/CIP-23-95, (eDockets) [20255-218452-01](#).

<sup>65</sup> *Natural Gas Energy Conservation and Optimization 2024 Status Report & Associated Compliance Filings*, Department ECO Unit, Proposed Decision, June 23, 2025, Docket No. G008/CIP-23-95, (eDockets) [20256-220157-01](#).

wastewater systems are very similar to the extension of natural gas service but are treated completely differently.<sup>66</sup> Under Minn. Stat. § 473.517, subp. (3) and § 444.075, subp. (3) new customers must pay to be connected to the system and also pay for the capacity needed in the pipes and wastewater treatment plants to accommodate them. Mr. Willett states:

Wastewater treatment clearly is a public good, yet, the state requires, in some cases (like MCES) and in other cases allows charging new customers for connection charges AND availability in the existing system. Natural gas extension should require both too.<sup>67</sup>

The Department agrees that the connection to the wastewater treatment system is similar to the process of extending natural gas service, but customers face the full cost of receiving this service. The implementation of free footage allowances was due to natural gas being perceived as a public good and expansion of the service was in line with State goals and Statutes. As discussed in the Department's initial comments, the State's goals and Statutes have changed in the thirty years since the implementation of the free footage allowances in 1995.<sup>68</sup> The treatment of wastewater system connections demonstrates that even public goods do not necessarily need subsidies like those given for natural gas service connections.

#### **IV. DEPARTMENT RECOMMENDATIONS**

The Department maintains its recommendation from its initial comments that the Commission eliminate the free footage allowance for all Minnesota gas utilities.

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<sup>66</sup> *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, Jason Willett, Public Comments, August 26, 2025, Docket No. G999/CI-21-565, (eDockets) [20258-222479-01](#).

<sup>67</sup> *Id.*

<sup>68</sup> Department's Initial Comments at 5-8.

## Attachments

## **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  
Supplemental Comments**

**Docket No. G999/CI-21-565**

Dated this **9<sup>th</sup>** day of **September 2025**

**/s/Sharon Ferguson**

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	21-565Official Service List
2	Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource		15669 WATERLOO CIR TRUCKEE CA, 96161 United States	Electronic Service		No	21-565Official Service List
3	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	21-565Official Service List
4	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
5	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	21-565Official Service List
6	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
7	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
8	Randall	Beck	rbeck3@wm.com	Waste Management Renewable Energy, L.L.C.		1021 Main St Houston TX, 77002 United States	Electronic Service		No	21-565Official Service List
9	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	21-565Official Service List
10	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	21-565Official Service List
11	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
12	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
13	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
14	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21-565Official Service List
15	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN,	Electronic Service		Yes	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101 United States				
16	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
17	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
18	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
19	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	21-565Official Service List
20	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
21	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
22	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
23	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
24	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
25	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	21-565Official Service List
26	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
27	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
28	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
29	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Lake Elmo MN, 55042 United States				Service List
30	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
31	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
32	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
33	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
34	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
35	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
36	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
37	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
38	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
39	Mark	Foster	mark@housingfirstmn.org	Housing First Minnesota		2960 Centre Pointe Drive Roseville MN, 55113 United States	Electronic Service		No	21-565Official Service List
40	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	21-565Official Service List
41	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	21-565Official Service List
42	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
43	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55102 United States				Service List
44	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
45	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
46	Laura	Haight	lhaight@pfpi.net	Partnership for Policy Integrity		POB 2513 Amherst MA, 01004 United States	Electronic Service		No	21-565Official Service List
47	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
48	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
49	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	21-565Official Service List
50	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
51	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
52	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
53	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-565Official Service List
54	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
55	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21-565Official Service List
56	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
57	Sarah	Johnson Phillips	sPhillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55402 United States				Service List
58	Brendan	Jordan	bjordan@gpsid.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	21-565Official Service List
59	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	21-565Official Service List
60	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
61	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	21-565Official Service List
62	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
63	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	21-565Official Service List
64	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
65	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
66	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
67	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
68	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
69	Robert	Lems	administration@dm-t-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	21-565Official Service List
70	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
71	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN,	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
						55101 United States				
72	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
73	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
74	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21- 565Official Service List
75	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21- 565Official Service List
76	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	21- 565Official Service List
77	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
78	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
79	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	21- 565Official Service List
80	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21- 565Official Service List
81	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
82	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
83	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21- 565Official Service List
84	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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
85	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
86	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
87	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
88	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
89	Will	Nissen	wnissen@mncee.org	Center for Energy and Environment			Electronic Service		No	21-565Official Service List
90	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
91	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
92	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	21-565Official Service List
93	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
94	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
95	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
96	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
97	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
98	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
99	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
100	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
101	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	21-565Official Service List
102	Lauren	Reeg	lreeg@rmi.org	RMI		806 N Pinyon Ct. Hartland WI, 53029 United States	Electronic Service		No	21-565Official Service List
103	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
104	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
105	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	21-565Official Service List
106	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	21-565Official Service List
107	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	21-565Official Service List
108	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
109	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-565Official Service List
110	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
111	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
112	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Ste 650 Washington DC, 20036 United States				Service List
113	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
114	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
115	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
116	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	21- 565Official Service List
117	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
118	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
119	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	21- 565Official Service List
120	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21- 565Official Service List
121	Mark	Spurr	msspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	21- 565Official Service List
122	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
123	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
124	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
125	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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
126	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
127	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-565Official Service List
128	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
129	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
130	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
131	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
132	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
133	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
134	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
135	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
136	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
137	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	21-565Official Service List
138	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
139	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
140	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
141	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
142	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