

March 3, 2026

Sasha Bergman
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. G-008/M-23-215

Dear Ms. Bergman,

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

In the Matter of CenterPoint's Natural Gas Innovation Plan.

The Petition was filed by CenterPoint Energy on January 22, 2026.

The Department **requests additional information from CenterPoint and will provide complete recommendations in reply comments.** The Department 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) TW/MZ/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G-008/M-23-215

I. INTRODUCTION

The Commission’s October 9, 2024 Order¹ approved and implemented CenterPoint Energy’s (CenterPoint or the Company) Natural Gas Innovation Act (NGIA) plan.² The Company’s NGIA plan includes 17 pilot programs and additional research and development (R&D) pilots. On January 22, 2026, CenterPoint filed a request for approval of budget modification for one of the pilots in the plan, Pilot D: Green Hydrogen Blending into Natural Gas Distribution System.³ This filing also informed the Commission and parties that a delay in authorization to proceed with Pilot D under the revised budget could jeopardize the receipt of federal tax credits. The Company requested to increase the Pilot D budget by \$1,404,384 and to transfer this amount from either the Pilot C budget (the Company’s preferred option) or the reserve funds for R&D pilots. The Company also requested that the Commission take action on this request by June 4, 2026 to avoid potential negative implications for federal tax credit receipt.

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.” ⁴
June 28, 2023	CenterPoint filed its Natural Gas Innovation Plan. ⁵
March 15, 2024	CenterPoint filed reply comments describing modifications to its Natural Gas Innovation Plan in response to parties’ comments and various changes to circumstances. ⁶

¹ *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) [202410-21085-01](#) (hereinafter, “Order Approving NGIA Plan”).

² *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan*, CenterPoint Energy, Petition, June 28, 2023, Docket No. G-008/M-23-215, (eDockets) [20236-196995-01](#) (hereinafter, “CenterPoint NGIA Plan”).

³ CenterPoint Energy, Request for Approval of Budget Modification and Compliance Filing, January 22, 2026, Docket No. G-008/M-23-215, (eDockets) [20261-227270-01](#) (hereinafter, “Petition”).

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

⁵ CenterPoint NGIA Plan.

⁶ Reply Comments, CenterPoint Energy, March 15, 2024, Docket No. G-008/M-23-215, (eDockets) [20243-204399-04](#) (hereinafter, “CenterPoint Modified NGIA Plan”).

October 9, 2024	The Public Utilities Commission (Commission) approved CenterPoint’s Natural Gas Innovation Plan. as described in CenterPoint’s March 15, 2024 reply comments, with modifications. ⁷
May 30, 2025	CenterPoint Energy filed its first NGIA annual status report for activities during calendar year 2024. ⁸
March 6, 2025	The Commission accepted CenterPoint’s annual status report, approving the continuation of all pilots within CenterPoint’s plan without modification and requiring CenterPoint to file a notification if the Pilot D timeline is delayed in a way that may jeopardize the receipt of expected federal tax credits. ⁹
January 22, 2026	CenterPoint filed its request for approval of budget modification and compliance filing. The requested budget modification included an increase of the Pilot D budget by \$1,404,384 and a proposal to move this amount from either the Pilot C budget or the R&D reserve funds. ¹⁰
January 30, 2025	The Commission issued a notice of comment period requesting comments from parties by March 3, 2026. ¹¹

Topic(s) open for comment:

- Should the Commission approve, modify, or deny CenterPoint’s request to increase its 5-year budget for its hydrogen blending pilot by \$1,404,384?
- If the Commission approves CenterPoint’s request to increase the pilot’s 5-year budget, should the Commission order CenterPoint to use excess funds from Pilot C, R&D Reserve Funds, or another source to cover this increase?
- Is CenterPoint’s updated 5-year budget for this pilot project reasonable?
- Are there any other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

First, the Department provides its analysis of CenterPoint’s requested budget increase for Pilot D and whether the updated 5-year budget for this pilot is reasonable. The Department then analyzes the Company’s proposed sources of funds to cover this increase.

⁷ Order Approving NGIA Plan.

⁸ CenterPoint Energy, Report, May 30, 2025, Docket No. G-008/M-23-215, (eDockets) [20255-219457-01](#) (hereinafter, “2024 NGIA Status Report”).

⁹ Order, November 13, 2025, Docket No. G-008/M-23-215, (eDockets) [202511-224543-01](#).

¹⁰ Petition.

¹¹ Notice of Comment Period, January 30, 2026, Docket No. G-008/M-23-215, (eDockets) [20261-227659-01](#).

A. BACKGROUND

In its Order approving CenterPoint's NGIA plan, the Commission allowed the Company to increase its budget for pilots with higher-than-expected expenditures without seeking additional approval from the Commission; however, the Commission placed conditions on this budget flexibility, including the following:

- The Commission required that any budget increase exceeding 25 percent of the total five-year pilot budget go through the annual review process or be filed for comment and approval in Docket No. 23-215; and
- the Commission prohibited any use of budget flexibility until the third year of the plan.¹²

The Company's proposed Pilot D budget increase exceeds 25% of the approved pilot budget.¹³ In addition, the Company filed the budget increase request fewer than three years into its NGIA plan. Therefore, CenterPoint is required to seek approval from the Commission to make the requested change. The Department notes that in its NGIA comments the Department recommended that Pilot D be rejected due to poor performance of the Company's other hydrogen electrolyzer, concerns about PTCs, and the overall cost effectiveness of the project.¹⁴ As the Commission approved the Company's Pilot D, however, the Department does not readdress concerns with the pilot here, and instead focuses only on the request to shift funds.

B. REQUEST FOR PILOT D BUDGET INCREASE

CenterPoint requested to increase its budget for Pilot D by \$1,404,384. If granted, this request would raise the Pilot D budget by 30%, from \$4,646,943 to \$6,051,327. The requested budget increase includes both an initial increase of \$468,412 and an additional contingency increase of \$935,972.¹⁵

CenterPoint notes that the following three factors impacted its revised Pilot D budget:

- Completion of a front-end engineering design (FEED) study which projected increased capital costs relative to the Company's initial cost estimate;¹⁶
- a change to the timeline of hourly matching requirements which resulted in an increase in Pilot D's projected eligibility for PTCs;¹⁷ and
- delays in the updated construction schedule and resulting operation date for Pilot D which resulted in fewer operation costs over the five year NGIA plan.¹⁸

The FEED study estimated total capital costs at \$7.4 million, a \$2.4 million increase from the initial plan estimate.¹⁹ The FEED study also included an accuracy range of plus or minus 25 percent, or \$5.9 million to \$9.2 million. Regarding the capital cost increase, the company states:

¹² Order Approving NGIA Plan at Order Point 26.

¹³ Petition at 8.

¹⁴ Department, Comments, January 16, 2024, Docket No. G-008/M-23-215, (eDockets) [20241-202261-02](#) at 40-41.

¹⁵ Petition at 6.

¹⁶ *Id.*, at 3.

¹⁷ *Id.*, at 4.

¹⁸ *Ibid.*

¹⁹ *Id.*, at 3.

This increase in costs is the result of numerous factors, including updated understandings of the technical requirements for the project, expansion of scope included in the estimate, increases to market pricing of critical components, general inflation, and high-levels of uncertainty typically associated with early-stage cost estimates for large infrastructure projects.²⁰

The Company notes that both the increase in Pilot D’s eligibility for PTCs and the decrease in five-year operation costs due to construction delays help to mitigate the increased capital costs. Specifically, the Company projects an increase of \$370,000 in PTC funding due to the assumption that hydrogen produced using grid-sourced electricity will continue to be eligible for the PTC until hourly matching requirements begin in 2030, rather than 2028 as previously assumed.²¹ The Company also removed a half year of operations costs for Pilot D to reflect a later projected start date in Year 3.

CenterPoint’s total projected incremental costs counting against the five-year budget, after accounting for increased capital costs, increased PTC funding, and decreased operations costs are \$468,412.²² However, the Company requests an additional \$935,972 to cover the uncertainty range of capital costs from the FEED study. These combined costs amount to the Company’s total budget increase request of \$1,404,384. Table 1 summarizes all components of the requested budget increase.

Table 1. Summary of CenterPoint's requested changes to the Pilot D 5-year budget.²³

		Approved budget	Updated budget (initial)	Updated budget (including contingency)
Total capital costs		\$5,000,000	\$7,364,781	\$9,205,976
Incremental costs counting against 5-year budget	5-year revenue requirements for capital projects	\$1,875,024	\$3,006,624	\$3,847,317
	Non-fuel O&M costs ²⁴	\$2,678,037	\$1,900,988	\$1,900,988
	Natural gas savings	-\$379,161	-\$312,981	-\$312,981
	Additional portfolio administrative costs ²⁵	\$473,041	\$520,724	\$616,002
	Total	\$4,646,943	\$5,115,355	\$6,051,327
	Requested increase		\$468,412	\$1,404,384

²⁰ *Id.*, at 3.

²¹ *Id.*, at 4.

²² *Id.*, at 6.

²³ Department summary of data included in Petition at Attachment 1.

²⁴ These costs incorporate PTCs.

²⁵ These costs represent administrative costs shared among the entire NGIA portfolio. Administrative costs are split between pilots according to pilot cost.

The Company's initial cost increase request (without the contingency amount) is only 10 percent of Pilot D's approved budget. This increase is within the 25 percent limit established by the Commission for CenterPoint's budget flexibility.²⁶ If the Company were to request just this initial increase, it would still not be able to exercise budget flexibility due to the prohibition of budget flexibility until the third year of the plan.²⁷ However, given that the initial cost increase request is well within the 25% limit, and that the completion of a FEED study represents a reasonable justification for this increase, the Department believes that the initial updated budget of \$5,115,355 is reasonable. **The Department recommends that the Commission approve CenterPoint's initial budget increase request of \$468,412.** However, the Department requests more information from the Company before making a recommendation regarding the Company's full budget increase request including the contingency portion.

The Department notes that the contingency portion of the Company's requested budget increase is significant—nearly two thirds of the total requested increase and 20% of the pilot's original approved budget. This substantial contingency is based on a 25 percent increase in capital costs from the baseline estimate produced by the FEED study.²⁸ **The Department recommends that CenterPoint explain in reply comments how the FEED study selected 25 percent as the amount by which to increase total capital costs for the upper range (contingency) estimate.**

The Department also notes that CenterPoint did not include in its original NGIA plan any funding allocated specifically to contingencies. However, the Company states that it separated its initial and contingency budget increase requests in the Petition because the Commission has previously considered contingency funding separately when reviewing NGIA pilot budgets.²⁹ Specifically, the Commission approved explicit contingency funds for two of Xcel's NGIA pilots: a 5 MW hydrogen pilot and a community ground source heat pump project.³⁰ Regarding Xcel's 5 MW hydrogen pilot, the Commission concluded that a contingency fund was appropriate given the inherent uncertainties associated with the size and novelty of the project. However, the Commission also required Xcel to include in its annual NGIA status reports a discussion of any use of the contingency fund including evidence of cost increases beyond Xcel's control.³¹ **The Department recommends that, if it authorizes CenterPoint's full requested Pilot D budget increase, the Commission similarly require the Company to report on any use of the contingency portion of the Pilot D budget (i.e., any expenditures above \$5,115,355) and to provide evidence of cost increases beyond the Company's control.**

²⁶ Order Approving NGIA Plan at Order Point 26(b).

²⁷ *Id.*, at Order Point 26(d).

²⁸ Petition at 3.

²⁹ *Id.*, at 6.

³⁰ *In the Matter of Xcel Energy's Natural Gas Innovation Plan, Order Approving Natural Gas Innovation Plan with Modifications*, May 16, 2025, Docket No. G-002/M-23-518, (eDockets) [202410-210845-01](#) (hereafter, "Order Approving Xcel's NGIA Plan"), at 9 and 18.

³¹ Order Approving Xcel's NGIA Plan, at Order Point 8(D).

Finally, the Department notes that the Company calculated the annual revenue requirements for capital projects associated with the upper range based on the following formula:³²

$$UpperCapEx_{year} = CapEx_{year} * \left(\frac{TotalCapEx * 1.25 - ITC}{TotalCapEx - ITC} \right)$$

In this formula, $CapEx_{year}$ represents the annual revenue requirement for capital projects based on the baseline FEED analysis, $TotalCapEx$ represents the total capital costs from the baseline FEED analysis, and ITC is the assumed ITC value associated with $TotalCapEx$. Since $TotalCapEx$ and ITC are constant values (\$7,364,781 and \$178,000, respectively), the formula can be rewritten as:

$$UpperCapEx_{year} = CapEx_{year} * 1.28$$

Therefore, while the upper range places total capital costs 25% higher than the baseline estimate, the corresponding five-year revenue requirements for capital costs are 28% higher than the baseline estimate. As shown by the equations above, this difference is due to the way in which the Company incorporated the ITC into the upper range. The Company's calculation assumes that the increase in capital costs associated with the upper uncertainty range would not impact the amount of ITC received. **The Department requests that CenterPoint explain in reply comments its justification for this assumption.**

C. SOURCE OF FUNDS TO COVER PILOT D BUDGET INCREASE

CenterPoint proposes two options to cover the Pilot D budget increase without increasing the overall NGIA plan budget. The Company's preferred option is to move the requested \$1.4 million out of the budget for Pilot C.³³ The Company's alternative option is to transfer the \$1.4 million from the reserve funds for R&D projects.³⁴

C.1. Moving Budget from Pilot C

CenterPoint's approved NGIA plan includes two pilots (B and C) that consist of purchasing renewable natural gas (RNG).³⁵ Pilot B identifies a specific producer from which to purchase RNG (Ramsey & Washington Counties Organic Waste). Pilot C involves issuing a request for proposal (RFP) to purchase an additional amount of RNG to complete the Company's RNG portfolio.³⁶ Pilot C's approved 5-year budget is \$40,271,426.³⁷

³² Department interpretation of Excel functions in Petition at Attachment 1.

³³ Petition at 6.

³⁴ *Id.*, at 9.

³⁵ CenterPoint's initial NGIA Plan filed on June 28, 2023 included a third RNG pilot, Pilot A, which proposed to purchase RNG from Hennepin County Organic Waste. However, as explained in the Company's March 15, 2024 reply comments, Pilot A was removed from the plan since Hennepin County decided not to continue pursuing its anaerobic digester project.

³⁶ CenterPoint NGIA Plan at 6.

³⁷ CenterPoint Modified NGIA Plan at 32.

In its first annual status report for 2024, CenterPoint stated that it had issued an RFP for RNG through Pilot C, evaluated responses, and initiated negotiations with RNG providers, but had not yet purchased any RNG.³⁸ The Company notes that since it filed this status report, it has completed its RFP process and signed contracts with three RNG producers.³⁹ However, several of the selected RNG facilities have expected in-service dates later than initially assumed in the Company’s NGIA plan. This means that the Company will start paying for RNG later than expected and therefore spend less than expected during the five-year plan period.⁴⁰ Specifically, the Company projects Pilot C’s 5-year costs to be \$7.1 million lower than the approved \$40.3 million budget.⁴¹ This excess budget would be more than enough to cover the requested \$1.4 million increase to Pilot D’s budget. Table 2 compares the updated cost estimates to the initial plan estimates in each plan year.

Table 2. RNG contract costs counting against the NGIA budget by NGIA plan year.⁴²

	Year 1	Year 2	Year 3	Year 4	Year 5
Assumed in Initial Plan (\$ million)	-	8.5	8.6	8.7	8.8
Updated Estimate (\$ million)	-	2.9	8.0	9.2	7.4

The Minnesota statute governing the NGIA plan, Minn. Stat. § 216B.2427, requires that “50 percent or more of the utility’s costs approved by the Commission for recovery under the plan are for the procurement and distribution of renewable natural gas, biogas, hydrogen produced via power-to-hydrogen, and ammonia produced via power-to-ammonia.”⁴³ Under the Company’s preferred proposal, costs would be shifted from an RNG pilot to a Hydrogen pilot, both of which meet the requirements of the NGIA statute.

Without the Company’s requested increase to Pilot D, the Pilot C budget decrease discussed above would drop the Company’s spending during its 5-year NGIA plan under the 50 percent alternative fuel threshold. However, the requested increase, even without the contingency portion, returns the Company’s spending to above the 50 percent threshold, regardless of whether the funding is shifted from Pilot D or from the reserve funds. As such, the 50 percent alternative fuel threshold should not influence whether funding should be shifted from Pilot C or from the reserve funds for R&D.

Finally, the Department notes that regardless of whether funding is shifted from Pilot C to Pilot D, the Pilot C spending during the current five-year planning period will decrease based on the Company’s updated cost projections. However, some Pilot C costs will potentially be shifted to the Company’s next NGIA plan as the contracts for RNG will likely continue beyond the current five-year planning period. As the requested funding is necessary to cover additional capital costs for Pilot D, not ongoing costs, shifting costs from Pilot C to D will likely not cause additional impacts to the Company’s next NGIA plan.

³⁸ 2024 NGIA Status Report at 18.

³⁹ Petition at 6.

⁴⁰ *Id.*, at 7.

⁴¹ *Id.*, at 7.

⁴² *Id.*, at 7.

⁴³ [Minn. Stat. § 216B.2427, subd. 2. d\(1\)](#) (2024).

C.2. Moving Budget from the R&D Reserve Funds

The Company's alternative proposal is to shift the \$1.4 million from the approved R&D reserve funds. CenterPoint's approved NGIA plan includes \$8.5 million of funding to be used for additional R&D pilots.⁴⁴ The Company indicated that of this funding an estimated \$60,000 to \$200,000 will be assigned to a new small farm participation in RNG markets study, but otherwise the funding is available.⁴⁵ This amount easily exceeds the increased budget request for Pilot D.

The Department notes that the intended use of the R&D reserve fund was for the Company to propose additional R&D projects in its annual status reports for approval by the Commission.⁴⁶ Although the funds are not committed, these funds were not intended to be a general reserve fund for all of the Company's NGIA pilots in case of cost overruns. While there is nothing in the Commission's Order Approving the NGIA that prevents parties from shifting this funding, it was not the intended use.

C.3. Department Recommendation

For the reasons discussed above, **the Department recommends that if the Commission approves CPE's request to increase the budget for Pilot D, that the Company shift funding from Pilot C**, rather than from the R&D Reserve funds. The R&D funding had a specific purpose that it might still be used for, as the Company has yet to even file its second annual report for its 5-year plan. Shifting funding from Pilot C poses no risk to Pilot C or to future NGIA plans.

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.

B. REQUEST FOR PILOT D BUDGET INCREASE

- The Department recommends that the Commission approve CenterPoint's initial budget increase request of \$468,412.
- The Department recommends that CenterPoint explain in reply comments how the FEED study selected 25 percent as the amount by which to increase total capital costs for the upper range (contingency) estimate.
- The Department recommends that, if it authorizes CenterPoint's full requested Pilot D budget increase, the Commission require the Company to report on any use of the contingency portion

⁴⁴ Petition at 9.

⁴⁵ *Ibid.*

⁴⁶ Order Approving NGIA Plan at 31.

of the Pilot D budget (i.e., any expenditures above \$5,115,355) and to provide evidence of cost increases beyond the Company's control.

- The Department recommends that CenterPoint explain in reply comments its justification for its assumption that the increase in capital costs associated with the upper uncertainty range would not impact the amount of ITC received.

C. SOURCE OF FUNDS TO COVER PILOT D BUDGET INCREASE

- C.3. The Department recommends that if the Commission approves CPE's request to increase the budget for Pilot D, that the Company shift funding from Pilot C, rather than from the R&D Reserve funds.

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 people 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 **3rd** day of **March 2026**

/s/Sharon Ferguson

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44	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	23-215Official
45	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	23-215Official
46	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
47	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
48	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
49	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
50	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
51	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-215Official
52	Mike	Henchen	mhenchen@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-215Official
53	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	23-215Official
54	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
55	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
56	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	23-215Official
57	Emma	Ingebretson	emma.ingebretsen@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall PO Box 59038 Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
58	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND,	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						58501 United States				
59	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	23-215Official
60	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23-215Official
61	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
62	Sarah	Johnson Phillips	sphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
63	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
64	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
65	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	23-215Official
66	D	Kalmon	dkalmon@mwm.org	Mississippi Watershed Management Organization		2522 Marshall St NE Minneapolis MN, 55418-3329 United States	Electronic Service		No	23-215Official
67	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23-215Official
68	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
69	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
70	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
71	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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
72	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
73	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
74	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
75	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
76	Robert	Lems	administration@dmt-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	23-215Official
77	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-215Official
78	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-215Official
79	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
80	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
81	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
82	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-215Official
83	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	23-215Official
84	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
85	Nicholas	Martin	nicholas.f.martin@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th floor 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, 55401 United States				
86	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	23-215Official
87	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
88	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	23-215Official
89	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-215Official
90	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	23-215Official
91	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
92	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	23-215Official
93	Ana Sophia	Mifsud	amifsud@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	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	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				
101	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23- 215Official
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@legalectric.org	Legalectric - 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@liunagro.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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
113	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	23-215Official
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	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
122	Patrick	Serfass	policy@americanbiogascouncil.org	American Biogas Council		1126 I Street SE Washington DC, 20003 United States	Electronic Service		No	23-215Official
123	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	23-215Official
124	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
125	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
126	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						4018 United States				
127	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-215Official
128	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-215Official
129	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
130	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-215Official
131	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-215Official
132	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-215Official
133	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
134	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
135	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
136	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
137	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	23-215Official
138	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		Yes	23-215Official
139	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	23-215Official
140	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-215Official
141	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable		1017 L Street #513	Electronic Service		No	23-215Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Natural Gas		Sacramento CA, 95814 United States				
142	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
143	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	23- 215Official
144	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
145	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23- 215Official
146	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23- 215Official
147	Donald	Wynia	donald.wynia@centerpointenergy.com	CenterPoint Energy		CenterPoint Energy 505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23- 215Official
148	Grant	Zimmerman	gzimmerman@ampamericas.com	Amp Americas		811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States	Electronic Service		No	23- 215Official
149	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
150	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 215Official