

**State of Minnesota
Before the Public Utilities Commission**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of an Inquiry into CenterPoint Energy’s request
for approval of its Advanced Metering Project

Docket No. G-008/M-21-48

In the Matter of an Inquiry Utility Investments that May Assist
in Minnesota’s Economic Recovery From the COVID-19
Pandemic

Docket No. E,G-999/CL-20-492

Comments of the Citizens Utility Board of Minnesota

The Citizens Utility Board of Minnesota (“CUB”, “we”, “our”, “us”) appreciates this opportunity to comment on the petition filed by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint” or the “Company”) requesting the Commission’s review and approval of the Company’s proposed Advanced Metering project investments.

On December 18, 2020, the Company filed a petition (the “Petition”) in Docket No. E,G-999/CL-20-492 (the “Economic Recovery Docket”) outlining proposed investments in seven projects the Company identified as assisting in Minnesota’s economic recovery following the COVID-19 pandemic.¹ Among the Company’s proposed investments is a \$1.5 million investment in an advanced metering infrastructure project to be implemented in 2021 (the “Phase 1 AMI Project”).² Specifically, the Company proposes to begin installing approximately 23,000 Itron smart meters in the ordinary course of installing meters to establish “new residential service” and replacing existing meters “in cases of damaged, obsolete, or failed residential meters which require replacement.”³ According to the Company, this initial Phase 1 AMI Project will, if authorized, precede the Company’s much larger, \$280 million investment involving the “full deployment of advanced meters with integrated safety features, including the replacement of substantially all residential meters in [the Company’s] service area with next generation gas meters” (the “Phase 2 AMI Project”).⁴ The Company anticipates that it will proceed with the Phase 2 AMI Project in 2023, but notes it anticipates consideration of the Phase 2 AMI Project to “require a longer Commission process.”⁵ The Company hopes to “proceed with [the Phase 1 AMI Project] while evaluation of the [Phase 2 AMI Project] is underway.”⁶

With its Petition, the Company seeks the Commission’s approval to (1) make the \$1.5 million investment in the Phase 1 AMI Project and (2) defer accounting of the Phase 1 AMI Project incremental costs, along with associated carrying costs, for future recovery.⁷

¹ CenterPoint Energy, Petition, Docket No. E,G-999/CL-20-492 (Dec. 18, 2020) (the “CenterPoint Petition”).

² Id. at 4.

³ Id.

⁴ CenterPoint Energy, Letter- Advanced Meter Project, Docket No. 21-48 (Feb. 3, 2021) at 2.

⁵ Id.

⁶ Id.

⁷ CenterPoint Petition at 1. See also, CenterPoint Energy, Letter- Advanced Meter Project, Docket No. 21-48 (Feb. 3, 2021) (further clarifying the Company’s intentions with respect to the Phase 1 AMI Project).

CUB respectfully recommends that the Commission deny approval of the \$1.5 million investment in the Phase 1 AMI Project. If the Commission approves the Phase 1 AMI Project, we recommend the Commission deny deferred accounting treatment of the incremental costs and carrying costs associated with the project. While we acknowledge that installing Itron meters *could* provide benefits to the Company and its ratepayers, the Company has not provided nearly enough information about the proposal to allow the Commission to adequately balance anticipated benefits of installing the meters against their anticipated costs. Further, the Phase 1 AMI Project does not meet the conditions the Commission established in the Economic Recovery Docket to identify utility investments that, if accelerated, could enhance Minnesota's economic recovery in the wake of the COVID-19 pandemic. Finally, it would be untimely for the Commission to accelerate a \$1.5 million, discretionary investment to promote economic recovery just as the Company's ratepayers will be asked to pay surcharges on their bills to help the Company recover \$500 million in costs the Company incurred during the recent extreme weather event in February 2021 (the "February Market Event").

Rather than accelerating approval of the Phase 1 AMI Project based on a limited record, we believe it would be most prudent for the Commission and stakeholders to undertake a more thorough analysis of the Company's full \$280 million proposed investment in its Phase 2 AMI Project, along with any other investments planned or needed to enable full functionality of the Itron meters. Doing so would help ensure that investments in an accelerated Phase 1 would not lead to an incomplete project and stranded assets if the Commission, following more thorough record development, decides to not authorize the Phase 2 AMI Project.

1. The Commission should not approve CenterPoint's request for approval of its Advanced Metering Project at this time.

- a. The Company has not provided enough information for the Commission or stakeholders to meaningfully weigh the costs vs. benefits of the proposed Advanced Metering project investment.

In its Petition, the Company identified several purported benefits of installing Itron meters in its Minnesota service territory. Among those benefits are automated and remote functions designed to enhance consumer safety. For example, the Company notes: (1) the meters can automatically send an alarm to the utility and shut off gas flow when the meters detect high flow conditions that suggest a gas line has been severed; (2) the meters can be shut off remotely and from a safe distance in an emergency, such as when a customer detects a gas leakage; and (3) the meters contain a temperature sensor that can automatically stop the flow of gas in the case of fire and detect air in the meter in the event the meter is removed due to theft, damage, or other potentially dangerous conditions.⁸ The Company also notes that installing the Itron meters will help reduce the amount of gas lost – and methane emissions released – through gas leaks. (Additional purported economic benefits the Company identified are discussed in Part 1.b, below.)

- i. *Though consumer safety and leak-detection features of the Itron meters may benefit consumers, the scope and availability of those benefits is unclear.*

The Company has produced very limited information or analysis demonstrating how Itron meters would mitigate existing safety concerns. In discovery, we asked the Company to provide the number of incidents in the past five years when the Company sent personnel to a customer's home or business within Minnesota to respond to a severed gas line, a potential gas leak, and/or a fire – and how often such incidents required

⁸ CenterPoint Petition at 24.

Company personnel to manually shut off gas supply to the affected property. We also asked the Company to provide information on total gas leakage incidents over the past ten years. We compiled the following chart from data the Company provided in response to these requests.⁹

	2015	2106	2017	2018	2019	2020
Total gas leaks	6,972	6,648	6,807	6,572	7,502	6,124
Total incidents requiring dispatch of personnel	933	912	933	932	948	966
Total incidents requiring manual shut off	758	753	606	612	618	655
% gas leaks requiring dispatch of personnel	13%	14%	14%	14%	13%	16%
% of gas leaks requiring manual shut off	11%	11%	9%	9%	8%	11%

As shown above, over the past five years the Company sent personnel to a home or business to address, on average, 14% of the gas leaks occurring per year. Only about 10% of yearly gas leaks have led to manual shut offs. If we were to assume that the remote shut off capabilities of Itron meters only help mitigate those incidents that currently involve sending personnel to physically investigate leaks, it seems the Company's AMI investments would *not* help mitigate the 86% or more of the yearly gas leaks it currently experiences that do not require dispatch of personnel. Even in the 14% of incidents when Itron meters *could* allow remote mitigation of gas leaks, CenterPoint has not demonstrated the degree to which advanced meters would reduce the need to send personnel to customer properties and/or engage in manual shutoffs. In fact, as discussed in more detail in 1.a.ii, below, the Company's responses to our information requests suggest that the meters' remote meter reading capabilities and real-time alerts will not be fully functional unless and until the Company installs an advanced communication system, the costs of which are not included in the cost estimates of either Phase 1 or Phase 2 of the project, as presented in the Petition.¹⁰

We also note that, historically, the Company has installed meters in new homes at about double the rate that it has replaced damaged or obsolete meters in existing homes.¹¹ If that trend continues, the majority of the Itron meters installed in Phase 1 of the project would be installed in new homes. As the Company does not track information about the age of buildings where leaks occur,¹² the Company has not demonstrated that installing Itron meters in more new homes than older homes is a prudent way to mitigate overall gas lost and unaccounted for on its system.

We recognize the above assumptions likely oversimplify an assessment of how well the Itron meters could help reduce gas leaks across the Company's system, but that oversimplification underscores our point: the Company needs to provide a deeper analysis into how it diagnoses the problems addressed by the Itron meters, and how well Itron meters address those problems as compared to other alternatives. Without that deeper analysis, the Company has not provided justification supporting its request for accelerated approval for Phase 1 of the project.

⁹ See CenterPoint Responses to CUB Information Requests Nos. 7 and 12, attached as Exhibits A and B, respectfully.

¹⁰ See Part 1.a.ii of these Comments, below, for additional discussion and references on this topic.

¹¹ CenterPoint Response to CUB Information Request No 2, attached as Exhibit C.

¹² See CenterPoint Energy, Response to CUB Information Request No. 8, attached as Exhibit D.

- ii. *The estimated costs of the Phase 1 and Phase 2 do not include potential costs of installing FAN equipment, improved software, and/or any other infrastructure.*

CUB also asked the Company (i) whether the proposed \$1.5 million Phase 1 cost estimates or the \$280 million Phase 2 cost estimates include costs of purchasing and/or installing field area network (FAN) equipment, a meter data management system or other software, and/or any other infrastructure necessary to allow for full connectivity and functionality of the Itron meters; and (ii) if the Company intends to rely on its existing infrastructure, whether any existing geographic or technological limitations will affect where CenterPoint can and cannot install new Itron meters or replace existing meters with Itron meters. The Company's full response to this request is reproduced below.

Neither CenterPoint Energy's proposed \$1.5 million Phase 1 cost of installing 23,000 Itron meters or the proposed Phase 2 Advanced Meter Project proposal include costs for the purchase and/or installation of field area network (FAN) equipment, a meter data management system or other software, and/or any other infrastructure. CenterPoint Energy is currently upgrading the software used in the mobile meter reading vehicles and plans to continue to use drive-by, mobile meter reading to collect consumption data. **Many** Intelis meter benefits (e.g. safety benefits, increased accuracy) do not require advanced communication infrastructure, and the Company is not planning to install advanced communication infrastructure at this time.¹³ (Emphasis added.)

We read this response to suggest many, but not *all*, of the purported benefits of the Itron meters would be functional without additional infrastructure-related investments. We were both curious to learn what benefits would not be utilized without additional investment and surprised to learn the Company did not include costs of data management systems, software, or other infrastructure in the \$280 million in estimated costs for Phase 2. Therefore, CUB submitted an additional information request asking whether the Itron meters the Company intends to install also include features or provide benefits that the Company and/or its Minnesota customers will not be able to utilize unless CenterPoint installs advanced communication infrastructure. The Company responded as follows:

An advanced communication system would allow CenterPoint Energy to (1) gather daily gas consumption readings which, under the current drive-by mobile meter reading, consumption is only captured once per month (not daily), (2) receive alerts in near-real time from the meter such as excessive flow or tamper alerts, and (3) subject to commission approval, remotely shut off the gas meter rather than driving to the customer address in non-gas emergency situations.¹⁴

We read this response to suggest: (i) the Company would not be able to gather daily gas consumption readings or receive "near real-time" alerts from Itron meters *unless* the Company invests in and installs an advanced communication system, and (ii) until the advanced communication system is installed, the Company will collect consumption data no more frequently than it currently collects it (which is monthly) using drive-by meter reading. In our view, this significantly undermines the Company's beneficial use arguments made in support of the Phase 1 AMI Project. We do not understand, for example, how the meters can "automatically send an alarm to the utility and shut off gas flow when the meters detect high flow conditions" if the meters do not allow the Company to "receive alerts in near-real time from the meter, such as excessive flow" without the installation of an advanced communication system.

¹³ CenterPoint Energy, Response to CUB Information Request No. 3, attached as Exhibit E.

¹⁴ CenterPoint Energy, Response to CUB Information Request No. 15(b), attached as Exhibit F.

The Company's response also suggests the Company is at least contemplating that the meters, coupled with an advanced communication system, could allow the Company (with the Commission's approval) to remotely shut off a customer's gas in a non-gas emergency situation. We are concerned that this would open the door to the Company remotely shutting off customers' gas supply in the event of a nonpayment on a bill – something CUB and other consumer advocates are highly likely to oppose.

Again, the Company must provide additional information about the full costs of the project, including any additional costs (such as the costs of procuring and installing an advanced communication system) not included in the \$1.5 million or \$280 million estimates included in the Company's Petition. This information is needed in order for stakeholders and the Commission to assess those costs against the benefits of the Itron meters and any less costly alternatives.

- iii. *The Company has no plans to reduce its workforce as a result of installing the Itron meters.*

We also asked whether the Company planned – either as part of the Phase 1 AMI Project or Phase 2 AMI Project – to eliminate any employee or contractor positions currently utilized to read the Company's existing meters and/or to otherwise respond to customer requests that require the Company to send personnel to a customer's home or place of business in Minnesota. In response, the Company indicated it has "no plans to reduce the size of the workforce as a result of this initiative."¹⁵ On one hand, this lack of workforce reduction may help preserve CenterPoint jobs in Minnesota communities hit hard by the COVID-19 pandemic. On the other hand, proponents of AMI investments in other jurisdictions have often cited reduced workforce-related costs among the primary benefits of investing in AMI.¹⁶ We think it is important for the Company to provide a more detailed analysis of how investments in AMI will affect its workforce-related costs, including any workforce cost savings that would result from the investment, and whether any such cost savings would be considered as part of the Company's efforts to recover costs of the AMI project from ratepayers.

- b. The Phase 1 AMI Project does not meet the conditions the Commission established in the Economic Recovery Docket to identify utility investments for accelerated approval.

While we believe the points presented in Section 1.a, above, already provide sufficient reason as to why the Commission should deny the Petition, we also note that Project does not meet the goals or conditions the Commission established when opening the Economic Recovery Docket. The Commission's stated purpose in opening the Economic Recovery docket was to identify ongoing, planned, or possible utility investments that meet the following conditions:

- Provide significant utility system benefits;
- Are consistent with approved resource plans, approved natural gas distribution infrastructure or pipeline safety plans, triennial conservation plans, and existing Commission orders;
- Reduce carbon or other pollutant emissions in the power sector or across economic sectors;
- Increase access to conservation and clean energy resources for Minnesotans;
- Create jobs or otherwise assist in economic recovery for Minnesotans; and

¹⁵ CenterPoint Energy, Response to CUB Information Request No. 5, attached as Exhibit G.

¹⁶ See, e.g., Direct Testimony of Curtis B. Mansfield, Utah PSC Docket No. 20-035-04 (May 2020) at 28 (in which Mr. Mansfield advocates on behalf of Rocky Mountain Power for deploying Itron meters and additional infrastructure, noting "the installation of AMI meters in Utah will reduce costs related to reading meters with the current drive-by system").

- Use woman, veteran, or minority owned businesses as much as possible and provide documentation of these efforts.¹⁷

Starting with the quarter ending June 30, 2021, utilities that submitted proposals in the Economic Recovery Docket, including the Company, will be required to file reports demonstrating how the above conditions are met.¹⁸ For example, to demonstrate how proposed investments reduce pollutant emissions, utilities will be required to file the estimated greenhouse gas emissions and other pollutants reduced or avoided with the metrics utilized by the Minnesota Pollution Control Agency.¹⁹ To demonstrate how proposed investments create jobs or otherwise assist in economic recovery Minnesotans, utilities will be required to file enhanced versions of the Labor Statistics Reporting.²⁰

The Company included the AMI Project as one of several economic recovery projects proposed in the Economic Recovery Docket. Therefore, the Petition should be evaluated against the objectives and reporting requirements the Commission established in that docket. The AMI-related benefits the Company has identified as purportedly aligning with the Commission's stated purpose in opening the Economic Recovery Docket (beyond the safety and leak mitigation benefits described above) are hypothetical, minor, indirect, or unclear.

For example, the Company notes that the Phase 1 AMI Project could lead to "possible indirect job creation associated with manufacturing of meters in 2021."²¹ However, in response to an information request asking for clarification on these "possible indirect" jobs, the Company noted that, while Itron currently provides 360 jobs at a manufacturing facility located in Waseca, Minnesota, Itron has no plans for facility expansion at that location.²² The Company suggests that approval of the Company's proposed investments in Itron meters could help *preserve* existing jobs at the Waseca facility.²³ However, given that Itron is based in Washington State and owns numerous other manufacturing facilities around the world,²⁴ we are not convinced that approval of the Company's Petition ensures job security for Itron's Waseca workers. The Company did not otherwise identify any new jobs likely to be created as a result of the Phase 1 AMI Project or Phase 2 AMI Project.

The Company also vaguely notes that methane emissions "can be avoided" if the Company is able to reduce the amount of gas lost through leaks. In discovery, the Company has provided us information on the number of gas leaks the Company has experienced in recent years, and the estimated volume of gas lost or unaccounted for in those leaks. However, the Company has not introduced into the record any robust analysis showing the extent to which Itron meters are likely to reduce methane emissions associated with gas leaks on its system, or showing that Itron meters are more likely to reduce methane emissions than other methods. Without more quantitative analysis, it is impossible to assess whether investing in Itron meters is likely to meaningfully reduce emissions, or whether any such reductions could be similarly achieved via less costly alternatives.

¹⁷ Minnesota Public Utilities Commission, Notice of Reporting Required by Utilities, Docket No. E,G-999/CL-20-492 (May 20, 2020).

¹⁸ Public Utilities Commission, Order Accepting Economic Recovery Investment Reports, Requiring Filings, and Encouraging Advancement of Diversity Goals, Docket. No. E, G-999/CL-20-492 (March 16, 2021).

¹⁹ Id.

²⁰ Id. at 9.

²¹ CenterPoint Petition at 24.

²² CenterPoint Energy, response to CUB Information Request No. 4, attached as Exhibit H.

²³ Id.

²⁴ See <https://www.itron.com/cn/company/who-we-are/locations?tag=key>

For these reasons, CUB respectfully disagrees with the Company's suggestion that the Phase 1 AMI Project provides the type of economic recovery benefits the Commission sought to identify when opening the Economic Recovery Docket. Therefore, there is no reason to accelerate approval of the Phase 1 AMI Project prior to conducting a more comprehensive review of the full Phase 2 AMI Project.

- c. The Phase 1 AMI Project is more likely to perpetuate systemic inequities in Minnesota than help address or eliminate them.

CUB, along with many other participants in the Economic Recovery Docket, previously recommended that the Commission proactively consider whether and how investments proposed in that docket address inequities in Minnesota.²⁵ We stand by our general recommendation that the Commission should prioritize approval and/or acceleration of initiatives that have a clear, measurable, and positive impact on those individuals, households, and communities who are disproportionately affected by current and historical economic conditions and who, therefore, are most in need of the assistance we believe the Commission envisioned when opening the Economic Recovery Docket. Conversely, we recommend that the Commission not approve or accelerate those initiatives likely to perpetuate or expand existing inequities by disproportionately benefiting individuals, households, or communities less in need of assistance.

Under the Company's proposal, Itron meters would be installed in new homes built in the Company's service territory, and would be used to replace damaged, obsolete, or failed standard meters in existing homes. Over the past five years, the Company, on average, installed about 19,982 new residential meters per year.²⁶ By comparison, the Company replaced an average of 9,173 residential meters per year.²⁷ If the Company were to continue this trend in the Phase 1 AMI project, the number of Itron meters the Company installs in new homes would be about double the number of Itron meters the Company installs to replace damaged, obsolete, or failed meters in existing homes. This suggests that, although the Company would seek to recover the costs of the Phase 1 AMI Project from all of its ratepayers, owners of newly constructed homes in the Company's service territory are more likely to directly benefit from the Phase 1 AMI Project than owners or renters of older homes. Due to prevalent inequities in homeownership in Minnesota,²⁸ we are concerned that this project would exacerbate existing inequities rather than help reduce them.

- d. The Commission should limit authorization of new investments to be recovered from ratepayers already asked to shoulder significant costs the Company incurred during the February Market Event.

The Company filed its Economic Recovery Petition prior to the February Market Event. Therefore, we, of course, do not fault the Company for not taking the February Market Event into consideration before seeking Commission approval for the Phase 1 AMI Project. However, we also find it impossible to ignore the impacts of the February Market Event when considering the Company's Petition.

In Docket 21-138, the Company is seeking to recover from ratepayers \$500 million (plus financing costs) in additional cost the Company incurred when purchasing natural gas at inflated prices on the spot market to

²⁵ See, Citizens Utility Board of Minnesota, Initial Comments, In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota's Economic Recovery from the COVID-19 Pandemic, Docket No. E,G999/CL-20-492 (Oct. 16, 2020).

²⁶ CenterPoint Energy, response to CUB Information Request No. 2, attached as Exhibit C.

²⁷ Id.

²⁸ See, e.g., Kim Palmer, "Confronting the Black homeownership gap in Minnesota," StarTribune (Aug. 22, 2020), available at <https://www.startribune.com/confronting-the-black-homeownership-gap-in-minnesota/572181702/>; Minnesota Compass, Homeownership gap, available at <https://www.mncompass.org/chart/k189/homeownership-gap#1-6923-g> (last accessed March 25, 2021);

meet heightened consumer demand.²⁹ If the Commission authorizes the Company to recover these costs, the average household in the Company's Minnesota service territory could face approximately \$394 in additional surcharges spread out over the next two years.³⁰ Expecting the Company's ratepayers to also share in the costs of Itron meters in order to help boost the economy would pile unnecessary additional financial burdens on ratepayers already struggling to navigate the COVID-19 pandemic, the related economic recession, and now the impending February Market Event surcharges. Many CenterPoint ratepayers are in no position to help fund discretionary spending with the objective of boosting the economy under these circumstances.

2. The Commission should not approve CenterPoint's request for approval of deferred accounting for its Advanced Metering Project.

The Company cites Minn. Rule 7825.0300, Subp. 4 as providing legal grounds supporting its request for approval of deferred accounting.³¹ Minn. Rule 7825.0300, Subp. 4 provides that a "public utility may petition the commission for approval of an exception to a provision of the system of accounts [and that] such exception shall be granted to the public utility for good cause shown."

Historically, the Commission has made a determination of "good cause" for deferred accounting based upon a four-factor test derived from prior Commission orders, public policy-goal justifications, or other criteria more appropriate for the specific facts of the case. For the reasons described in more detail below, the Company has not met its burden under any of these legal standards for demonstrating good cause exists for the Commission to grant deferred accounting treatment for its investments in the Phase 1 AMI Project or carrying costs associated with those investments. Therefore, if the Commission authorizes the Company's investment in the Phase 1 AMI Project, we nonetheless recommend that the Commission deny the Company's deferred accounting request.

a. The Company has not met the "four-factor test" to demonstrate why deferred accounting treatment is warranted.

In 2017, the Commission issued an order granting Minnesota Energy Resources Corporation ("MERC") deferred accounting treatment for certain expenses it incurred replacing aging, customer-owned fuel lines with new, utility-owned lines.³² The Commission found good cause existed to authorize deferred accounting of expenses MERC incurred under those circumstances because the expenses: (1) related to utility operations for which ratepayers have incurred costs or received benefits; (2) were significant in amount; (3) were unforeseen, unusual, or extraordinary; and (4) were subject to review for reasonableness and prudence. If the Commission elects to consider the Company's deferred accounting request under this four-part test, we believe the burden should be on the Company to demonstrate how each prong of the test is met.

The brief arguments the Company presented in its Petition to support its deferred accounting request refer generally to all seven of the projects the Company proposed in the Economic Recovery Docket and not specifically to the Phase 1 AMI Project.³³ The Company's own explanation for why it is seeking approval to invest in Itron meters also contradicts arguments the Company would need to make to show it meets the

²⁹ CenterPoint Energy, Petition, Docket No. G-008/M-21-138 (March 15, 2021).

³⁰ Id at 10.

³¹ CenterPoint Petition at 27.

³² Id., citing Minnesota Public Utilities Commission, Order Approving Phase 1 of Farm Tap Replacement Project with Conditions, Docket No. G-011/M-17-409 (Nov. 30, 2017) ("MERC Farm Tap Replacement Order") at 9-10.

³³ CenterPoint Petition at 27.

four-pronged test for the Commission to grant deferred accounting. For example, in its Petition, the Company discusses the unforeseeable and unusual circumstances surrounding the COVID-19 pandemic, noting:

Absent the current economic circumstances and the Commission's request for accelerated utility investment proposals, the Company would not undertake the additional and accelerated projects proposed in this filing at this time.³⁴

We do not disagree that the COVID-19 pandemic and related economic conditions were unforeseen and unusual. However, it is the foreseeability of the Company's costs – not the foreseeability of the pandemic – that is at issue when determining whether deferred accounting is appropriate under the four-part test. The Company's own statement confirms the investment is not needed at this time; rather, it is discretionary and entirely foreseeable. Also, the Company can avoid incurring "significant" costs associated with the AMI Project simply by not pursuing it. For these reasons, the Company has failed to demonstrate it meets either prong 2 or 3 of the four-part test.

- b. The Company has not identified a public policy mandate calling for gas utilities to install smart meters in Minnesota.

The Company also notes in its Petition that each of its proposed investments (including its investment in Itron meters) "advance important policy objectives [...] designed to assist in Minnesota's economic recovery from the Covid-19 pandemic and economic recession through the direct creation of new jobs in the communities we serve, and through the creation of indirect jobs and economic growth resulting from such investment and economic activity." However, as discussed above, the Company has not provided evidence that the Phase 1 AMI Project will create *any* jobs, whether directly or indirectly.

In most prior instances when the Commission has granted deferred accounting, the utility had incurred expenses to directly meet an important public policy mandate identified by the Commission, imposed by the Legislature, or arising from an imminent threat that required the utility's immediate attention. For example, the Commission previously granted deferred accounting for expenses utilities incurred: (1) to replace aging and potentially dangerous customer-owned gas lines with utility-owned lines;³⁵ (2) to make "extraordinary efforts" to restore power to 15,000 customers experiencing flood-related power outages;³⁶ (3) to comply with a state statute requiring utilities to propose, then construct and install, new utility facilities within Minnesota's Central Corridor;³⁷ (4) to comply with a Commission order requiring the utility to design a time-of-use rate pilot program;³⁸ (5) to comply with a state statute that required the utility to file a tariff that allows a customer to purchase electricity solely for the purpose of recharging an electric vehicle;³⁹ and (6) to comply with a state statute designed to reduce mercury emissions.⁴⁰ In contrast, the Company has

³⁴ Id.

³⁵ Minnesota Public Utilities Commission, Order Approving Phase 1 of Farm Tap Replacement Projects with Conditions, Docket No. G-011/M-17-409 (Nov. 30, 2017).

³⁶ Minnesota Public Utilities Commission, Order Authorizing Deferred Accounting Treatment Subject to Conditions, Docket No. E-G001/M-08-728 (April 23, 2009).

³⁷ Minnesota Public Utilities Commission, Order Accepting Withdrawal, Granting Deferred Accounting, And Setting Filing Requirements, Docket No. E-002/M-09-1488 (Dec. 27, 2010.)

³⁸ Minnesota Public Utilities Commission, Order Approving Deferred Accounting, Docket No. E-002/M-03-1462 (Feb. 25, 2005).

³⁹ Minnesota Public Utilities Commission, Order Approving Pilots with Modifications, Authorizing Deferred Accounting, and Setting Reporting Requirements, Docket No. E-002/M-18-643 (July 17, 2019).

⁴⁰ Docket No. E-002/M-06-1315 (Jan. 31, 2007).

not identified any regulatory, legislative, or urgent public policy mandate specifically calling for the Company to install smart meters in its Minnesota service territory.

- c. Future cost-recovery efforts should be informed by a more thorough analysis of the costs vs. benefits of the Company's proposed investments.

Finally, whether or not deferred accounting is granted, any future cost recovery proceeding must address a large number of issues pertaining to investments in AMI technology, many of which are quite complex and new to the Commission and parties in Minnesota – particularly when AMI technology is utilized by gas utilities. The proceeding must provide for a full understanding of the Company's investments, their functionalities, their incremental costs and how these compare to alternatives, as well as the mechanisms to keep customer costs low.

Conclusion

For the reasons outlined above, CUB respectfully recommends that the Commission deny the Company's request for acceleration of the Phase 1 AMI Project. If the Commission approves acceleration of the project, CUB recommends that the Commission deny the Company's request for deferred accounting treatment for costs incurred (including carrying costs) to implement that project. A more comprehensive process is needed to thoroughly review CenterPoint's proposed AMI project. Such a process should examine the costs and benefits of the fully proposed AMI project (including Phase 1, Phase 2 and any further planned or needed investments to achieve full functionality of the Itron meters) before the Commission authorizes the Company to move forward with the investment.

Thank you for the opportunity to comment on this matter.

Sincerely,

March 29, 2021

/s/ Brian Edstrom

Brian Edstrom

Senior Regulatory Advocate

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cc: Service list

State of Minnesota Citizens Utility Board of Minnesota

Utility Information Request

Docket Number: G-008/M-21-48 - Advanced Metering
Requested From: CenterPoint Energy Minnesota Gas

Date of Request: 2/26/2021
Response Due: 3/12/2021

Analyst Requesting Information: Brian Edstrom

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.																																				
CUB 07	<p>Identify the number of incidents, by customer class, in the past five years (2015-2020) when the Company sent personnel to a customer's home or business within Minnesota to respond to a severed gas line, a potential gas leak, and/or fire.</p> <p>a. In how many of these incidents did the Company manually shut off gas flow to the home or business?</p> <p>b. What is the estimated total cost to the Company, and estimated average per-incident cost to the Company (by customer class), of responding to such incidents?</p> <p>Response:</p> <p>Please see below table for the total number of incidents, total incident cost, average cost per incident, and the total incidents that resulted in shut off gas flow from 2015-2020. The Company does not track incidents by customer class.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th></th> <th>2015</th> <th>2016</th> <th>2017</th> <th>2018</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>Total incidents</td> <td>933</td> <td>912</td> <td>933</td> <td>932</td> <td>948</td> <td>966</td> </tr> <tr> <td>Total incident cost</td> <td>\$993,397</td> <td>\$872,480</td> <td>\$1,036,222</td> <td>\$1,254,211</td> <td>\$1,605,294</td> <td>\$1,582,906</td> </tr> <tr> <td>Average cost</td> <td>\$1,064</td> <td>\$956</td> <td>\$1,110</td> <td>\$1,345</td> <td>\$1,693</td> <td>\$1,639</td> </tr> <tr> <td>Total incidents w/gas flow shut off</td> <td>758</td> <td>753</td> <td>606</td> <td>612</td> <td>618</td> <td>655</td> </tr> </tbody> </table>		2015	2016	2017	2018	2019	2020	Total incidents	933	912	933	932	948	966	Total incident cost	\$993,397	\$872,480	\$1,036,222	\$1,254,211	\$1,605,294	\$1,582,906	Average cost	\$1,064	\$956	\$1,110	\$1,345	\$1,693	\$1,639	Total incidents w/gas flow shut off	758	753	606	612	618	655
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Response By: Seth DeMerritt
Title: Manager, Regulatory Affairs
Department: Mng Smr Reg Svc Rev Req
Telephone: 612-321-4423

**State of Minnesota
Citizens Utility Board of Minnesota**

Utility Information Request

Docket Number: G-008/M-21-48 - Advanced Metering
Requested From: CenterPoint Energy Minnesota Gas

Date of Request: 2/26/2021
Response Due: 3/12/2021

Analyst Requesting Information: Brian Edstrom

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.																																		
CUB 12	<p>Please provide all metrics that CenterPoint uses to track leakage rates, loss rates, and lost and unaccounted for gas in its Minnesota service territory. Provide each of the metrics by month for the most recent 10 years available.</p> <p>Response:</p> <p>The Company does not use any specific metrics to track leakage rates, loss rates, and lost and unaccounted for gas. The following table is based on annual reporting to the Department of Transportation for the historical reference of the number of leaks, and the percentage of lost and unaccounted for gas.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Total Leaks</th> <th>LUFG (%)</th> </tr> </thead> <tbody> <tr><td>2020</td><td>6,124</td><td>1.90</td></tr> <tr><td>2019</td><td>7,502</td><td>1.40</td></tr> <tr><td>2018</td><td>6,572</td><td>1.49</td></tr> <tr><td>2017</td><td>6,807</td><td>1.42</td></tr> <tr><td>2016</td><td>6,648</td><td>1.23</td></tr> <tr><td>2015</td><td>6,972</td><td>0.86</td></tr> <tr><td>2014</td><td>7,379</td><td>1.31</td></tr> <tr><td>2013</td><td>7,077</td><td>0.85</td></tr> <tr><td>2012</td><td>7,381</td><td>0.76</td></tr> <tr><td>2011</td><td>8,733</td><td>0.94</td></tr> </tbody> </table>	Year	Total Leaks	LUFG (%)	2020	6,124	1.90	2019	7,502	1.40	2018	6,572	1.49	2017	6,807	1.42	2016	6,648	1.23	2015	6,972	0.86	2014	7,379	1.31	2013	7,077	0.85	2012	7,381	0.76	2011	8,733	0.94
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**State of Minnesota
Citizens Utility Board of Minnesota**

Utility Information Request

Docket Number: G-008/M-21-48 - Advanced Metering
Requested From: CenterPoint Energy Minnesota Gas

Date of Request: 2/26/2021
Response Due: 3/12/2021

Analyst Requesting Information: Brian Edstrom

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.																															
CUB 02	<p>For each of the past five years (2015-2020), please identify:</p> <ul style="list-style-type: none"> a. the number of damaged, obsolete, or failed meters that CenterPoint has replaced within its Minnesota service territory by customer class; and b. the number of new meters that CenterPoint has installed within its Minnesota service territory by customer class. <p>Response:</p> <ul style="list-style-type: none"> a. The number of damaged, obsolete, or failed meters the Company replaced are included in Table 1. <p>Table 1</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Residential</th> <th>Commercial</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>10,995</td> <td>836</td> </tr> <tr> <td>2019</td> <td>9,426</td> <td>923</td> </tr> <tr> <td>2018</td> <td>8,964</td> <td>1,037</td> </tr> <tr> <td>2017</td> <td>10,020</td> <td>1,479</td> </tr> <tr> <td>2016</td> <td>7,489</td> <td>1,584</td> </tr> <tr> <td>2015</td> <td>8,144</td> <td>1,650</td> </tr> </tbody> </table> <ul style="list-style-type: none"> b. The number of new meters installed by the Company are included in Table 2. <p>Table 2</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Residential</th> <th>Commercial</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>14,484</td> <td>2,073</td> </tr> <tr> <td>2019</td> <td>16,624</td> <td>2,243</td> </tr> </tbody> </table>	Year	Residential	Commercial	2020	10,995	836	2019	9,426	923	2018	8,964	1,037	2017	10,020	1,479	2016	7,489	1,584	2015	8,144	1,650	Year	Residential	Commercial	2020	14,484	2,073	2019	16,624	2,243
Year	Residential	Commercial																													
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Response By: Seth DeMerritt
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2018	17,940	2,159
2017	20,723	2,320
2016	25,487	2,272
2015	24,639	2,328

Response By: Seth DeMerritt
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**State of Minnesota
Citizens Utility Board of Minnesota**

Utility Information Request

Docket Number: G-008/M-21-48 - Advanced Metering
Requested From: CenterPoint Energy Minnesota Gas

Date of Request: 2/26/2021
Response Due: 3/12/2021

Analyst Requesting Information: Brian Edstrom

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
CUB 08	<p>For incidents identified in response to CUB’s above Information Request #7, identify:</p> <ul style="list-style-type: none"> a. the primary age of the building that is the location of the incident. b. the zipcode of the building that is the location of the incident. <p>Response:</p> <p>Please see Attachment_CUB_008.xlsx for the zip code by incident date for the incidents discussed in the response to CUB Information Request 07. The Company does not track the age of buildings for incidents.</p>

Response By: Seth DeMerritt
Title: Manager, Regulatory Affairs
Department: Mng Smr Reg Svc Rev Req
Telephone: 612-321-4423

**State of Minnesota
Citizens Utility Board of Minnesota**

Utility Information Request

Docket Number: G-008/M-21-48 - Advanced Metering
Requested From: CenterPoint Energy Minnesota Gas

Date of Request: 2/26/2021
Response Due: 3/12/2021

Analyst Requesting Information: Brian Edstrom

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
CUB 03	<p>Please describe whether the proposed \$1.5 million Phase 1 cost of installing 23,000 Itron meters includes costs of purchasing and/or installing field area network (FAN) equipment, a meter data management system or other software, and/or any other infrastructure necessary to allow for full connectivity and functionality of those meters.</p> <ol style="list-style-type: none"> a. If CenterPoint will be utilizing existing FAN equipment, software, and/or infrastructure, describe any geographic or technological limitations that will affect where CenterPoint can and cannot install new Itron meters or replace existing meters with Itron meters. b. If, as part of the proposed \$1.5 million Phase 1 investment in installing 23,000 Itron meters, CenterPoint will be purchasing and/or installing new FAN equipment, software, and/or infrastructure, describe (i) the estimated costs associated with such purchase and/or installation; (ii) the process by which CenterPoint will determine where such equipment, software, and/or infrastructure will be installed; and (iii) once that equipment, software, and/or infrastructure is purchased and/or installed, any geographic or technological limitations that will affect where CenterPoint can and cannot install new Itron meters or replace existing meters with Itron meters. c. If, as part of the proposed \$250 million Phase 2 investment in replacing all standard meters within CenterPoint’s Minnesota service territory with Itron meters, CenterPoint will be purchasing and/or installing new FAN equipment, software, and/or infrastructure, describe (i) the estimated costs associated with such purchase and/or installation; (ii) the process by which CenterPoint will determine where such equipment, software, and/or infrastructure will be installed; and (iii) once that equipment,

Response By: Seth DeMerritt
Title: Manager, Regulatory Affairs
Department: Mng Smr Reg Svc Rev Req
Telephone: 612-321-4423

software, and/or infrastructure is purchased and/or installed, any geographic or technological limitations that will affect where CenterPoint can and cannot install new Itron meters or replace existing meters with Itron meters.

Response:

Neither CenterPoint Energy's proposed \$1.5 million Phase 1 cost of installing 23,000 Itron meters or the proposed Phase 2 Advanced Meter Project proposal include costs for the purchase and/or installation of field area network (FAN) equipment, a meter data management system or other software, and/or any other infrastructure. CenterPoint Energy is currently upgrading the software used in the mobile meter reading vehicles and plans to continue to use drive-by, mobile meter reading to collect consumption data. Many Intelis meter benefits (e.g. safety benefits, increased accuracy) do not require advanced communication infrastructure, and the Company is not planning to install advanced communication infrastructure at this time.

**State of Minnesota
Citizens Utility Board of Minnesota**

Utility Information Request

Docket Number: G-008/M-21-48 - Advanced Metering
Requested From: CenterPoint Energy Minnesota Gas

Date of Request: 3/16/2021
Response Due: 3/30/2021

Analyst Requesting Information: Brian Edstrom

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
CUB 15	<p>Where applicable, provide your answers in a live, unlocked spreadsheet with all links and formula intact. If the calculations or data origins are not obvious/labeled, provide a narrative explanation.</p> <p>In response to CUB Information Request No. 3, CenterPoint noted, in part:</p> <p>CenterPoint Energy is currently upgrading the software used in the mobile meter reading vehicles and plans to continue to use drive-by, mobile meter reading to collect consumption data. Many Intelis meter benefits (e.g. safety benefits, increased accuracy) do not require advanced communication infrastructure, and the Company is not planning to install advanced communication infrastructure at this time.</p> <p>a. Is drive-by, mobile meter reading (as described in the above response) currently utilized for all CenterPoint customers within its Minnesota service territory? If not, please describe:</p> <ul style="list-style-type: none"> i. where, or to whom, CenterPoint’s drive-by, mobile meter reading is and is not currently available; and ii. whether and how installing Intelis meters will make drive-by, mobile meter reading newly available to additional customers in CenterPoint’s Minnesota service territory. <p>b. CenterPoint noted “many” Intelis meter benefits do not require advanced infrastructure. Do the Intelis meters CenterPoint intends to install also include features or provide benefits that CenterPoint and/or its Minnesota customers will not be able to utilize unless CenterPoint installs advanced communication infrastructure?</p>

Response By: Seth DeMerritt
Title: Manager, Regulatory Affairs
Department: Mng Smr Reg Svc Rev Req
Telephone: 612-321-4423

Response:

- a. CenterPoint Energy has been using mobile, drive-by meter reading in the Minneapolis metropolitan area since the early to mid-1980s, and expanded to greater Minnesota from 2013-2015. To date, no geographic limitations have been experienced, and as long as the meter reading vehicle can get within a thousand feet of the meter, it can be read. CenterPoint Energy's average annual read rate is 99.92%. The new Intelis meters are designed to fit seamlessly into our existing mobile meter reading system, and no extensive software or hardware system changes are required to maintain the historical read rate performance. Therefore, the installation of the Intelis meters will have no meaningful impact to the number of customers that can be read by mobile meter reading vehicles.
- b. An advanced communication system would allow CenterPoint Energy to (1) gather daily gas consumption readings which, under the current drive-by mobile meter reading, consumption is only captured once per month (not daily), (2) receive alerts in near-real time from the meter such as excessive flow or tamper alerts, and (3) subject to commission approval, remotely shut off the gas meter rather than driving to the customer address in non-gas emergency situations.

**State of Minnesota
Citizens Utility Board of Minnesota**

Utility Information Request

Docket Number: G-008/M-21-48 - Advanced Metering
Requested From: CenterPoint Energy Minnesota Gas

Date of Request: 2/26/2021
Response Due: 3/12/2021

Analyst Requesting Information: Brian Edstrom

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
CUB 05	<p>Identify:</p> <ul style="list-style-type: none"> a. the number of employees or contractors CenterPoint typically engages in a year (as determined by reviewing data for the years 2015-2020) to read the Company's existing meters and/or to otherwise respond to customer requests that require the Company to travel to a customer's home or place of business within its Minnesota service territory; and b. the number of employee or contractor positions identified in response to IR #5(a) likely to be eliminated if the Company were to: (i) install the 23,000 Itron meters proposed under CenterPoint's proposed \$1.5 million Phase 1 investment in AMI; or (ii) replace substantially all existing CenterPoint meters in its Minnesota service territory with Itron meters under CenterPoint's proposed \$250 million Phase 2 investment in AMI. <p>Response:</p> <ul style="list-style-type: none"> a. CenterPoint Energy has a staff of 12 full-time employees who are responsible for reading roughly 780,000 meters on a monthly basis. The Company is not currently using contractors for meter reading purposes. Additionally, the Company has roughly 475-500 employees and roughly 475-500 contractors who are responsible for the construction, maintenance, and operation of the gas delivery system that could respond to customer requests and travel to customers' homes. b. The Company has no plans to reduce the size of the workforce as a result of this initiative.

Response By: Seth DeMerritt
Title: Manager, Regulatory Affairs
Department: Mng Smr Reg Svc Rev Req
Telephone: 612-321-4423

**State of Minnesota
Citizens Utility Board of Minnesota**

Utility Information Request

Docket Number: G-008/M-21-48 - Advanced Metering
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Date of Request: 2/26/2021
Response Due: 3/12/2021

Analyst Requesting Information: Brian Edstrom

Type of Inquiry: Other

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
CUB 04	<p>In its petition, CenterPoint suggests that its \$1.5 million Phase 1 investment could lead to indirect jobs associated with manufacturing of Itron meters. Please provide:</p> <ul style="list-style-type: none"> a. an estimate of the number of jobs that currently exist in Minnesota and employ Minnesotans to manufacture gas meters (including smart meters and standard meters); b. an estimate of the number of newly created jobs that would be located in Minnesota and employ Minnesotans (not including jobs identified as responsive to IR# 4(a), above) if CenterPoint’s petition is approved; and c. a description of how CenterPoint estimated the number of newly created jobs identified in response to above IR# 4(b), along with the likely location of those jobs and a description of the worker skills and qualifications required for those jobs. <p>Response:</p> <p>CenterPoint Energy contacted Itron regarding employment of Minnesotans to manufacture gas meters in Minnesota. Currently Itron has a facility located in Waseca Minnesota, that specifically manufactures Encoder-Reencoder-Transmitters (ERTs) and Intelis meters. This facility currently provides 360 jobs, which are primarily manufacturing, to Minnesotans and, while there are no plans for facility expansion, the Intelis meter project will be an integral part for Itron to continue to provide employment for the current 360 positions. With the declining demand for ERT only business, this facility could have otherwise seen a reduction in workforce.</p>

Response By: Seth DeMerritt
Title: Manager, Regulatory Affairs
Department: Mng Smr Reg Svc Rev Req
Telephone: 612-321-4423

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_20-492_Official
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_20-492_Official
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-492_Official
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_20-492_Official
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Laura	Bishop	Laura.Bishop@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_20-492_Official
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-492_Official
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-492_Official
Gabriel	Chan	gabechan@umn.edu	University of Minnesota	130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, Minnesota 55455	Electronic Service	No	OFF_SL_20-492_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-492_Official
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_20-492_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-492_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-492_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-492_Official
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_20-492_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-492_Official
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_20-492_Official
Carrie	Desmond	carrie.desmond@metrotransit.org	Metropolitan Council	560 6th Avenue North Minneapolis, MN 55411	Electronic Service	No	OFF_SL_20-492_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bridget	Dockter	Bridget.Dockter@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-492_Official
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_20-492_Official
Michelle	Dreier	mdreier@electricalassociation.com		N/A	Electronic Service	No	OFF_SL_20-492_Official
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_20-492_Official
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-492_Official
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_20-492_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-492_Official
Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-492_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-492_Official
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_20-492_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_20-492_Official
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-492_Official
James	Garness	james.r.garness@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-492_Official
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_20-492_Official
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_20-492_Official
Anita	Grace	anita@gracemulticultural.com	GRACE Multicultural	12959 196th LN NW Elk River, MN 55330	Electronic Service	No	OFF_SL_20-492_Official
Bill	Grant	billgrant@minncap.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Dr Ste 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_20-492_Official
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-492_Official
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-492_Official
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_20-492_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_20-492_Official
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-492_Official
MJ	Horner	mj.horner@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-492_Official
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-492_Official
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Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_20-492_Official
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Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-492_Official
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-492_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance	570 Asbury St. St. Paul, MN 55104	Electronic Service	No	OFF_SL_20-492_Official
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_20-492_Official
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-492_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-492_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-492_Official
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-492_Official
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Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-48_M-21-48
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-48_M-21-48
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