



414 Nicollet Mall  
Minneapolis, MN 55401

September 9, 2025

—Via Electronic Filing—

Mike Bull  
Acting Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: SUPPLEMENTAL REPLY COMMENTS  
IN THE MATTER OF CHANGES TO NATURAL GAS UTILITY REGULATORY AND  
POLICY STRUCTURES TO MEET STATE GREENHOUSE REDUCTION GOALS  
DOCKET NO. G999/CI-21-565

Dear Mr. Bull:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Supplemental Reply Comments in response to the Comments submitted by the Minnesota Department of Commerce, Office of the Attorney General and several other parties on August 8, 2025.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

Please contact Pamela Gibbs at 612-330-2889 or [pamela.k.gibbs@xcelenergy.com](mailto:pamela.k.gibbs@xcelenergy.com) or contact me at 612-330-7681 or [lisa.r.peterson@xcelenergy.com](mailto:lisa.r.peterson@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

LISA R. PETERSON  
DIRECTOR, REGULATORY PRICING & ANALYSIS

Enclosures  
cc: Service List

State of Minnesota  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

|                     |              |
|---------------------|--------------|
| Katie J. Sieben     | Chair        |
| Hwikwon Ham         | Commissioner |
| Audrey C. Partridge | Commissioner |
| Joseph K. Sullivan  | Commissioner |
| John A. Tuma        | Commissioner |

IN THE MATTER OF A COMMISSION  
EVALUATION OF CHANGES TO  
NATURAL GAS UTILITY REGULATORY  
AND POLICY STRUCTURES TO MEET  
STATE GREENHOUSE GAS REDUCTION  
GOALS

DOCKET NO. G999/CI-21-565

**SUPPLEMENTAL REPLY  
COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Supplemental Reply Comments in response to the May 5, 2025 NOTICE OF COMMENT PERIOD in this docket and to reply comments submitted in this proceeding on August 8, 2025.

Comments submitted in this docket have been wide-ranging, and some have been raised multiple times. We continue to believe that substantial changes are not needed or advisable at this time. We focus our Supplemental Comments on new arguments made regarding the Company's positions stated in Initial and Reply Comments. We also note that Center for Energy and Environment (CEE), the Laborers' International Union of North America (LiUNA), and the Company have submitted joint decision options as a separate filing (Joint Decision Options).

**SUPPLEMENTAL REPLY COMMENTS**

In addition to the Company, the following stakeholders submitted reply comments: Office of the Attorney General (OAG), CenterPoint Energy, Great Plains Natural Gas Company, Minnesota Energy Resources Corporation (MERC), CEE, Citizen

Utility Board of Minnesota (CUB), LiUNA, Housing First, Fresh Energy and Minnesota Center for Environmental Advocacy (Fresh Energy), Rewiring America (RWA), Minnesota Biofuels Association, CURE, and the Coalition of Greater Minnesota Cities. In addition, Andy Willette and Tim Eian submitted public comments.

The following summarizes the Company's positions:

- (1) The Company recommends that the Commission not substantially change line extension allowance policies at this time;
- (2) The Company does not object to the OAG's recommendation<sup>1</sup> that utilities remove their caps on excess footage costs and that the Commission remove the discretion that utilities have to apply CIAC waivers based on ad hoc factors;
- (3) The OAG made several recommendations regarding questions that utilities should be periodically required to address.<sup>2</sup> The Company either agreed with or did not object to these recommendations, except we disagree that assumed revenues for extension allowances for new customers include a reasonable estimate of use per customer that accounts for potential declining customer usage from energy efficiency and electrification of heating and appliances.

The Company is also supportive of the recommendations made by CEE regarding single-family new construction Energy Conservation and Optimization (ECO) programs and questions to ask utilities to consider, as modified in the Joint Decision Options.

The following Supplemental Reply Comments support the positions summarized above:

## **I. THE NEAR-TO-MID TERM FUTURE IN MINNESOTA WILL REQUIRE A NATURAL GAS SYSTEM**

Although we agree that State and Company goals to reduce greenhouse gas (GHG) emissions will likely result in throughput reduction on the gas system over time, that does not mean that the natural gas system is obsolete or will no longer be needed in the future. Minnesota's cold winter climate requires heating solutions that can provide efficient and affordable heating during the moderate portions of the heating season

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<sup>1</sup> OAG comments at 32-35.

<sup>2</sup> *Id.* at 36-37.

and during the coldest weeks of the year. Nearly all stakeholders advocating for the elimination of line extension allowance policies failed to address this issue.<sup>3</sup>

### **A. Minnesota’s Cold Climate Requires a Strategic Approach to GHG Emissions Reduction**

As we have stated from the outset in these proceedings, the Company’s natural gas system provides customers with a vital heating service during the winter months. It is important that all customers, especially low-income and rural customers, have equal access to the resource of natural gas, which can provide heat far more efficiently and cost-effectively than electricity in cold weather. Natural gas has also been shown to be the most efficient and affordable supplemental heat option for customers who install an electric primary heat source. This means that a natural gas distribution system will continue to be needed, even if throughput in that system declines and over time natural gas shifts from being a primary to largely a supplemental heating fuel.

Some stakeholders have pointed to the rising demand for Air Source Heat Pumps (ASHPs) to support their recommendation to eliminate line extension allowance policies.<sup>4</sup> Although cold climate ASHPs can be highly efficient in moderate temperatures, even the most effective ASHPs available today have been shown to require supplemental heat during the coldest weeks of the year. We see the increase sales of ASHPs as supporting the dual fuel approach towards decarbonization by electrifying a substantial portion of customer’s heating needs while allowing natural gas to provide back-up fuel when needed in Minnesota’s climate.

Accordingly, we agree with CEE’s assessment that “[d]ual fuel applications will be critical for decarbonizing gas end uses in Minnesota from both an emission reduction and cost standpoint. . . . With the existing prevalence of natural gas heating in Minnesota, the reality is, simply, that natural gas will be a utilized heating source for many customers in the coming years.”<sup>5</sup>

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<sup>3</sup> RWA acknowledged the need for dual fuel in Minnesota’s cold climate, but argued that delivered fuels and electric resistance heating would be more appropriate back-up fuels than natural gas, despite the energy insecurity this causes for low-income and rural customers and negative effects these fuels have on GHG emissions. *See* RWA reply comments at 14. The Company addresses RWA’s recommendation that customers rely on delivered fuels or electric resistance heating further below.

<sup>4</sup> *See* RWA reply comments at 7-8; Fresh Energy reply comments at 3-4.

<sup>5</sup> CEE reply comments at 9.

## B. A Dual Fuel Approach Can Cost-Effectively Reduce GHG Emissions

Many stakeholders appear to assume that full electrification is the only path to decarbonize the natural gas system.<sup>6</sup> However, a dual fuel approach with natural gas as the backup fuel can result in significant reductions in GHG emissions without incurring the high costs of full electrification. For example, as provided in the Company's Reply Comments, a dual fuel approach towards new home decarbonization can reduce natural gas consumption by roughly 75 percent, while keeping electric system upgrades costs more manageable, relative to system upgrade costs that would be required using an all-electric approach with electric resistance back up.<sup>7</sup>

Other stakeholders provided additional sources demonstrating significant GHG emissions reductions can be achieved through a dual fuel approach:

- CEE's 2023 study titled Minneapolis 1-4 Unit Residential Weatherization and Electrification Roadmap for the City of Minneapolis;<sup>8</sup>
- The Hydro-Quebec example provided by CEE;<sup>9</sup> and
- The 2025 Illinois Study provided by MERC.<sup>10</sup>

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<sup>6</sup> For instance, CURE argues that natural gas is not the future and that the whole natural gas system will need to be decommissioned based on its assumption that "to achieve Minnesota's GHG emission goals, natural gas utilities will need to dramatically reduce their operations to reduce emissions." CURE reply comments at 19. As discussed, CURE's assumption is incorrect: a dual fuel approach with natural gas as the backup system can achieve significant GHG emission reductions, without requiring decommissioning of the entire natural gas system.

We note that CURE also urges the Commission to require gas utilities to plan for the eventual cost of decommissioning this infrastructure. *Id.* at 19-20. Such a recommendation is clearly beyond the scope of an inquiry into line extension policies.

<sup>7</sup> See the Company's Initial Comments at 4. Based on internal modeling of a new single-family home with cold climate air source heat pump and gas furnace with switch over at 15 degrees Fahrenheit. There would be additional gas savings at a lower switchover point, however this would come with additional electric system capacity impacts and infrastructure investment requirements. A full-electrification approach to all new builds would require a very well thought out plan to address distribution, generation and transmission cost impacts to customers.

<sup>8</sup> CEE reply comments at 9.

<sup>9</sup> *Id.* at 11-23.

<sup>10</sup> MERC reply comments at 2-3.

CURE argued that the natural gas distribution system increases GHG emissions due to pipe leaks. CURE’s comments are based upon a study<sup>11</sup> (Weller study) that surveyed distribution pipelines in 12 cities across the United States. These results, however, are inapplicable to the Company’s line extension allowances. First, they are not representative of the Company’s Minnesota distribution system which has a much lower leak rate. The Weller study reported an estimated activity factor of “0.51 leaks per main mile or one leak for approximately every two miles of main”<sup>12</sup> while the leak rate for the Company’s Minnesota distribution system is 0.014 per mile of distribution main. The Company’s significantly lower leak rate (and therefore lower emissions) reflects the difference in materials for the utilities included in the Weller study, which have a higher percentage of materials that are more likely to have leaks. See Table 1 below.

**Table 1**  
**Company System Compared to Weller Study**  
**Overall Leak Rate and Materials Percentages**

|                    | Company System | Study |
|--------------------|----------------|-------|
| Leak Rate per Mile | 0.014          | 0.51  |
| Cast Iron          | 0%             | 39%   |
| Bare Steel         | 0.2%           | 20%   |
| Coated Steel       | 7.5%           | 22%   |
| Plastic            | 92.3%          | 19%   |

Second, the Weller study does not reflect leak rates for current *and future* line extensions, which are being constructed of new, corrosion resistant materials and as such, are expected to have significantly lower leak rates than what the Weller study reports. The leak rates per mile of main for recently installed (2020-2024) infrastructure in the Company’s system are as follows:

- Plastic – 0.008<sup>13</sup>
- Steel – 0.05

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<sup>11</sup> A National Estimate of Methane Leakage from Pipeline Mains in Natural Gas Local Distribution Systems by Zachary D. Weller, Steven P. Hamburg, and Joseph C. von Fischer, Environmental Science and Technology, 2020 (Weller study). See CURE reply comments at 6 n.5.

<sup>12</sup> *Id.* at 6 (quoting the Weller study at 8964).

<sup>13</sup> The vast majority of the Company’s line extensions are done in plastic.

In addition, the Company is piloting advanced mobile leak detection (AMLD) technology through the Company's NGIA Plan, which was approved on May 16, 2025.<sup>14</sup> The data collection for the pilot should begin in early 2026. AMLD technology provides highly sensitive leak detection and will allow the Company to make emissions prioritized repairs.

Third, the annual emissions calculated in the study CURE relies on assumes all leaks of all sizes are leaking for an entire year, i.e., repair time was not factored into their calculation. Factoring in repair times, especially for large leaks from dig-ins, would reduce the leak rate and the leak time used by the study. So, the annual emissions cited in the Weller study likely significantly overstate actual leak rates for the Company's Minnesota gas distribution system.

### C. The Company's Net Zero Vision

Fresh Energy notes that the Company's net zero vision (NZV) emphasizes that all-electric new construction should be prioritized.<sup>15</sup> We disagree with this characterization in that we are *promoting electric options where feasible and desired by the customer*, but these efforts are additive and complementary to the many emissions reduction efforts the Company has underway. In the quote from our Net-Zero Vision referenced by Fresh Energy, we clearly state that we will *promote* electrification first for voluntary customer adoption; this is not meant to imply it would replace or detract from other efforts. We provide the quote from Fresh Energy's comments below:

*Xcel has also emphasized that all-electric new construction should be prioritized in its net zero vision: "By 2030, the company expects to still achieve net-zero methane emissions on its gas distribution system, while also promoting electrification-first for new construction for customers and investing in its system to allow for greater electric adoption."*<sup>16</sup>

Our vision is that by 2050, we aim to be a net-zero energy provider. By 2030, we seek to achieve net-zero methane emissions on our own system while helping customers achieve emissions reductions as well, including voluntary electrification options. Our electrification first effort is entirely voluntary and focused on ensuring information on electric or dual fuel options is available for customers early in their decision-making

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<sup>14</sup> Docket No. G002/M-23-518.

<sup>15</sup> Fresh Energy reply comments at 11.

<sup>16</sup> *Id.* (emphasis added).

process and ensuring we are evaluating alternatives in our own planning. New builds represent a unique opportunity in these efforts given efficiency and electric measures may be easier to implement as compared to a retrofit. As part of this approach, we will continue to provide our customers with options for all types of energy, including efficient fuel switching under ECO and strategic electrification under NGIA, and ensure they are aware of all options before deciding which electric and/or gas service options are right for them. Given the continued customer demand, we will continue to carry a diverse energy mix that includes natural gas — a highly efficient, reliable and affordable fuel source – for customers that prefer this option and/or end users where electric alternatives are not feasible or are prohibitively expensive.

#### **D. Natural Gas is a Significantly Better Option than Delivered Fuels for Customer Cost and GHG Emission Reductions**

RWA argues that although dual fuel might be necessary for cold climates, it is better to rely on delivered fuels or electric resistance heating as back up fuels than natural gas.<sup>17</sup> The Company disagrees. As LiUNA’s reply comments make clear, delivered fuels are roughly three times more expensive than natural gas, and households that depend on delivered fuels and wood burning for heat are concentrated in rural and often low-income families. Eliminating options for them to have natural gas contributes to energy insecurity and undercuts climate goals because wood, oil, and propane are associated with significantly more air pollution and GHG emissions than either natural gas or electric alternatives.<sup>18</sup> Additionally, electric resistance heating is typically expensive,<sup>19</sup> which would especially impact low-income customers.

#### **E. Future of Gas Demand**

Several stakeholders argue that the demand for natural gas will decline precipitously in the near future,<sup>20</sup> causing customers to pay high costs from stranded assets. This prediction, however, runs contrary to the on-the-ground experience that CenterPoint Energy described in its reply comments.<sup>21</sup> Additionally, as described in our Initial

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<sup>17</sup> See RWA reply comments at 14.

<sup>18</sup> LiUNA reply comments at 5-6.

<sup>19</sup> See [Electric Heat in Minnesota: A guide to saving money this winter | Citizens Utility Board](#), accessed on September 2, 2025 (“Around 20 percent of Minnesota households heat their homes using electricity, especially in greater Minnesota. If these homes use electric resistance heat (think floorboard registers or electric furnaces), home heating costs are especially expensive.”).

<sup>20</sup> See, e.g., Fresh Energy reply comments at 6-7; CUB initial comments at 9.

<sup>21</sup> CenterPoint Energy reply comments at 5.

Comments, the Company responded to over 3,500 requests for new residential meters each year in 2022, 2023, and 2024.<sup>22</sup>

More importantly, as discussed above, a dual fuel approach to decarbonization is the best path forward in Minnesota because it significantly reduces GHG emissions at a lower cost than full electrification, while providing an affordable, reliable back up fuel for cold Minnesota winters. Utilizing a dual fuel approach means, contrary to predictions of imminent decline, the gas system will be an essential component of the decarbonization strategy for the foreseeable future.

### **III. ELIMINATING LINE EXTENSION ALLOWANCES WOULD HARM LOW-INCOME AND RURAL CUSTOMERS**

As discussed at length in our Reply Comments,<sup>23</sup> eliminating line extension allowances would mean that low-income and rural customers must either remain on delivered fuels, or pay significantly more to establish gas service, which is likely in the near term to increase rather than decrease energy burden and energy insecurity for low-income customers wanting natural gas service.

The Company believes it is critically important for all Minnesota customers, from any income level, to have access to safe, affordable, and reliable energy, which line extension allowances provide.

### **CONCLUSION**

The Company appreciates this opportunity to submit Supplemental Reply Comments on the issue of modifying existing gas line extension policies for rate-regulated gas utilities. Consistent with our position in our Initial Comments and Reply Comments, the Company believes that substantial changes are not needed or advisable at this time.

Dated: September 9, 2025

Northern States Power Company

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<sup>22</sup> The Company's Initial Comments at 5.

<sup>23</sup> See the Company's Reply Comments, Section V.

## CERTIFICATE OF SERVICE

I, Marie Horner, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

**DOCKET No.      G999/CI-21-565**

Dated this 9th day of September 2025

/s/

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Marie Horner  
Regulatory Administrator

| #  | First Name | Last Name | Email                                   | Organization   | Agency                      | Address  | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name           |
|----|------------|-----------|---|--|-----------------------------|--|--------------------|---------------------------|-------------------|-----------------------------|
| 1  | Michael    | Ahern     | ahern.michael@dorsey.com                | Dorsey & Whitney, LLP  |                             | 50 S 6th St<br>Ste 1500<br>Minneapolis<br>MN, 55402-1498<br>United States      | Electronic Service |                           | No                | 21-565Official Service List |
| 2  | Elizabeth  | Aldrich   | laldrich@bluesource.com                 | Bluesource   |                             | 15669<br>WATERLOO<br>CIR<br>TRUCKEE<br>CA, 96161<br>United States              | Electronic Service |                           | No                | 21-565Official Service List |
| 3  | Gary       | Ambach    | gambach@slipstreaminc.org               | Slipstream, Inc.   |                             | 8973 SW<br>Village Loop<br>Chanhassen<br>MN, 55317<br>United States            | Electronic Service |                           | No                | 21-565Official Service List |
| 4  | Kristine   | Anderson  | kanderson@greatermngas.com              | Greater Minnesota Gas, Inc.                                      |                             | 1900 Cardinal<br>Lane<br>PO Box 798<br>Faribault MN,<br>55021<br>United States | Electronic Service |                           | No                | 21-565Official Service List |
| 5  | Susan      | Arntz     | sarntz@mankatomn.gov                    | City Of Mankato  |                             | P.O. Box 3368<br>Mankato MN,<br>56002-3368<br>United States                    | Electronic Service |                           | No                | 21-565Official Service List |
| 6  | Mara       | Ascheman  | mara.k.ascheman@xcelenergy.com          | Xcel Energy  |                             | 414 Nicollet<br>Mall Fl 5<br>Minneapolis<br>MN, 55401<br>United States         | Electronic Service |                           | No                | 21-565Official Service List |
| 7  | Jessica L  | Bayles    | jessica.bayles@stoel.com                | Stoel Rives LLP  |                             | 1150 18th St<br>NW Ste 325<br>Washington<br>DC, 20036<br>United States         | Electronic Service |                           | No                | 21-565Official Service List |
| 8  | Randall    | Beck      | rbeck3@wm.com                           | Waste Management Renewable Energy, L.L.C.                        |                             | 1021 Main St<br>Houston TX,<br>77002<br>United States                          | Electronic Service |                           | No                | 21-565Official Service List |
| 9  | David      | Bender    | dbender@earthjustice.org                | Earthjustice   |                             | 1001 G Street<br>NW<br>Suite 1000<br>Washington<br>DC, 20001<br>United States  | Electronic Service |                           | No                | 21-565Official Service List |
| 10 | Christina  | Benning   | christina.benning@centerpointenergy.com | CenterPoint Energy Minnesota Gas                                 |                             |  | Electronic Service |                           | No                | 21-565Official Service List |
| 11 | Alicia     | Berger    | alicia.e.berger@xcelenergy.com          | Xcel Energy  |                             | 414 Nicollet<br>Mall<br>Minneapolis<br>MN, 55401<br>United States              | Electronic Service |                           | No                | 21-565Official Service List |
| 12 | Mike       | Boughner  | michael.l.boughner@xcelenergy.com       | Xcel Energy  |                             | 414 Nicollet<br>Mall<br>Minneapolis<br>MN, 55401<br>United States              | Electronic Service |                           | No                | 21-565Official Service List |
| 13 | Tim        | Brinkman  | tim.brinkman@gvtel.com                  | Garden Valley Telephone Company d/b/a Garden Valley Technologies |                             | 206 Vance<br>Ave S<br>PO Box 259<br>Erskine MN,<br>56535<br>United States      | Electronic Service |                           | No                | 21-565Official Service List |
| 14 | Matthew    | Brodin    | mbrodin@allete.com                      | Minnesota Power  |                             | 30 West<br>Superior<br>Street<br>Duluth MN,<br>55802<br>United States          | Electronic Service |                           | No                | 21-565Official Service List |
| 15 | Mike       | Bull      | mike.bull@state.mn.us                   |  | Public Utilities Commission | 121 7th Place<br>East, Suite<br>350<br>St. Paul MN,                            | Electronic Service |                           | Yes               | 21-565Official Service List |

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|    |            |                    |  |  |   | 55101<br>United States   |                    |                           |                   |                             |
| 16 | Roderick   | Cameron            | roderick.cameron@ftr.com                   | Frontier Communications of Minnesota, Inc.                 |   | 180 South Clinton Avenue<br>Rochester NY,<br>14646<br>United States                            | Electronic Service |                           | No                | 21-565Official Service List |
| 17 | Andrew     | Campeau            | andyc@mnpipetrades.com                     | Minnesota Pipe Trades Association                          |   | 353 W 7th street<br>st paul MN,<br>55102<br>United States                                      | Electronic Service |                           | No                | 21-565Official Service List |
| 18 | James      | Canaday            | james.canaday@ag.state.mn.us               |  | Office of the Attorney General - Residential Utilities Division | Suite 1400<br>445<br>Minnesota St.<br>St. Paul MN,<br>55101<br>United States                   | Electronic Service |                           | No                | 21-565Official Service List |
| 19 | Thomas     | Carlson            | thomas.carlson@edf-re.com                  | EDF Renewable Energy                                       |   | 10 2nd St NE<br>Ste. 400<br>Minneapolis<br>MN, 55413<br>United States                          | Electronic Service |                           | No                | 21-565Official Service List |
| 20 | Melodee    | Carlson Chang      | melodee.carlsonchang@centerpointenergy.com | CenterPoint Energy   |   | 505 Nicollet Mall<br>Minneapolis<br>MN, 55402<br>United States                                 | Electronic Service |                           | No                | 21-565Official Service List |
| 21 | Olivia     | Carroll            | oliviac@cubminnesota.org                   | Citizens Utility Board of Minnesota                        |   | 332<br>Minnesota St<br>W1360<br>St. Paul MN,<br>55101<br>United States                         | Electronic Service |                           | No                | 21-565Official Service List |
| 22 | Margaret   | Cherne-Hendrick    | cherne-hendrick@fresh-energy.org           |  |   | Fresh Energy<br>408 Saint Peter Street,<br>Suite 220<br>St. Paul MN,<br>55102<br>United States | Electronic Service |                           | No                | 21-565Official Service List |
| 23 | Cody       | Chilson            | cchilson@greatermngas.com                  | Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC |   | 1900 Cardinal Ln<br>PO Box 798<br>Faribault MN,<br>55021<br>United States                      | Electronic Service |                           | No                | 21-565Official Service List |
| 24 | Ray        | Choquette          | rchoquette@agp.com                         | Ag Processing Inc.   |   | 12700 West Dodge Road<br>PO Box 2047<br>Omaha NE,<br>68103-2047<br>United States               | Electronic Service |                           | No                | 21-565Official Service List |
| 25 | John       | Coffman            | john@johncoffman.net                       | AARP   |   | 871 Tuxedo Blvd.<br>St. Louis MO,<br>63119-2044<br>United States                               | Electronic Service |                           | No                | 21-565Official Service List |
| 26 | Sheri      | Comer              | sheri.comer@ftr.com                        | Frontier Communications Corporation                        |   | 1500 MacCorkle Ave SE<br>Charleston WV, 25396<br>United States                                 | Electronic Service |                           | No                | 21-565Official Service List |
| 27 | Generic    | Commerce Attorneys | commerce.attorneys@ag.state.mn.us          |  | Office of the Attorney General - Department of Commerce         | 445<br>Minnesota Street Suite<br>1400<br>St. Paul MN,<br>55101<br>United States                | Electronic Service |                           | Yes               | 21-565Official Service List |
| 28 | Jean       | Comstock           | jean.comstock.dbcc@gmail.com               | St. Paul 350   |   | 729 6th St E<br>St. Paul MN,<br>55106<br>United States   | Electronic Service |                           | No                | 21-565Official Service List |
| 29 | George     | Crocker            | gwillc@nawo.org                            | North American Water Office                                |   | 5093 Keats Avenue  | Electronic Service |                           | No                | 21-565Official              |

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| 30 | Seth       | DeMerritt      | seth.demerritt@centerpointenergy.com | CenterPoint Energy Minnesota Gas                 |                        | 505 Nicollet Mall Minneapolis MN, 55402 United States                                 | Electronic Service |                           | No                | 21-565Official Service List |
| 31 | James      | Denniston      | james.r.denniston@xcelenergy.com     | Xcel Energy Services, Inc.                       |                        | 414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States                          | Electronic Service |                           | No                | 21-565Official Service List |
| 32 | Tom        | Dicklich       | tdicklich@mntrades.org               | Minnesota Building & Construction Trades Council |                        | 353 W. 7th St Rm 105 Saint Paul MN, 55102 United States                               | Electronic Service |                           | No                | 21-565Official Service List |
| 33 | J.         | Drake Hamilton | hamilton@fresh-energy.org            | Fresh Energy                                     |                        | 408 St Peter St Ste 350 Saint Paul MN, 55101 United States                            | Electronic Service |                           | No                | 21-565Official Service List |
| 34 | Brian      | Edstrom        | briane@cubminnesota.org              | Citizens Utility Board of Minnesota              |                        | 332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States                         | Electronic Service |                           | No                | 21-565Official Service List |
| 35 | Caitlin    | Eichten        | eichten@fresh-energy.org             | Fresh Energy                                     |                        | 408 St Peter St #350 St. Paul MN, 55102 United States                                 | Electronic Service |                           | No                | 21-565Official Service List |
| 36 | John       | Farrell        | jfarrell@ilsr.org                    | Institute for Local Self-Reliance                |                        | 2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States | Electronic Service |                           | No                | 21-565Official Service List |
| 37 | Sharon     | Ferguson       | sharon.ferguson@state.mn.us          |  | Department of Commerce | 85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States                        | Electronic Service |                           | No                | 21-565Official Service List |
| 38 | Mike       | Fiterman       | mikefiterman@libertydiversified.com  | Liberty Diversified International                |                        | 5600 N Highway 169 Minneapolis MN, 55428-3096 United States                           | Electronic Service |                           | No                | 21-565Official Service List |
| 39 | Mark       | Foster         | mark@housingfirstmn.org              | Housing First Minnesota                          |                        | 2960 Centre Pointe Drive Roseville MN, 55113 United States                            | Electronic Service |                           | No                | 21-565Official Service List |
| 40 | Lucas      | Franco         | lfranco@liunagro.com                 | LIUNA  |                        | 81 Little Canada Rd E Little Canada MN, 55117 United States                           | Electronic Service |                           | No                | 21-565Official Service List |
| 41 | Daryll     | Fuentes        | energy@usg.com                       | USG Corporation                                  |                        | 550 W Adams St Chicago IL, 60661 United States  | Electronic Service |                           | No                | 21-565Official Service List |
| 42 | Patrick    | Garofalo       | pgarofalo@mngrocers.com              | Minnesota Grocers Association                    |                        | 1360 Energy Park Drive Suite #300 St Paul MN, 55108 United States                     | Electronic Service |                           | No                | 21-565Official Service List |
| 43 | Edward     | Garvey         | garveyed@aol.com                     | Residence  |                        | 32 Lawton St Saint Paul   | Electronic Service |                           | No                | 21-565Official              |

| #  | First Name | Last Name        | Email                                   | Organization                     | Agency | Address  | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name           |
|----|------------|------------------|---|----------------------------------|--------|--|--------------------|---------------------------|-------------------|-----------------------------|
|    |            |                  |   |                                  |        | MN, 55102<br>United States   |                    |                           |                   | Service List                |
| 44 | Debbie     | Goettel          | debbie.goettel@hennepin.us              | Partnership on Waste and Energy  |        | 2785 White Bear Ave N<br>Ste 350<br>Maplewood MN, 55109<br>United States                   | Electronic Service |                           | No                | 21-565Official Service List |
| 45 | Todd J.    | Guerrero         | todd.guerrero@kutakrock.com             | Kutak Rock LLP                   |        | Suite 1750<br>220 South Sixth Street<br>Minneapolis MN, 55402-1425<br>United States        | Electronic Service |                           | No                | 21-565Official Service List |
| 46 | Laura      | Haight           | lhaight@pfpi.net                        | Partnership for Policy Integrity |        | POB 2513<br>Amherst MA, 01004<br>United States   | Electronic Service |                           | No                | 21-565Official Service List |
| 47 | Kim        | Havey            | kim.havey@minneapolismn.gov             | City of Minneapolis              |        | 350 South 5th Street,<br>Suite 315M<br>Minneapolis MN, 55415<br>United States              | Electronic Service |                           | No                | 21-565Official Service List |
| 48 | Philip     | Hayet            | phayet@jkenn.com                        | J. Kennedy and Associates, Inc.  |        | 570 Colonial Park Drive<br>Suite 305<br>Roswell GA, 30075-3770<br>United States            | Electronic Service |                           | No                | 21-565Official Service List |
| 49 | Adam       | Heinen           | aheinen@dakotaelectric.com              | Dakota Electric Association      |        | 4300 220th St W<br>Farmington MN, 55024<br>United States                                   | Electronic Service |                           | No                | 21-565Official Service List |
| 50 | Annete     | Henkel           | mui@mutilityinvestors.org               | Minnesota Utility Investors      |        | 413 Wacouta Street<br>#230<br>St.Paul MN, 55101<br>United States                           | Electronic Service |                           | No                | 21-565Official Service List |
| 51 | Joylyn C   | Hoffman Malueg   | joylyn.hoffmanmalueg@wecenergygroup.com | Minnesota Energy Resources       |        | 2685 145th St W<br>Rosemount MN, 55068<br>United States                                    | Electronic Service |                           | No                | 21-565Official Service List |
| 52 | Michael    | Hoppe            | lu23@ibew23.org                         | Local Union 23, I.B.E.W.         |        | 445 Etna Street<br>Ste. 61<br>St. Paul MN, 55106<br>United States                          | Electronic Service |                           | No                | 21-565Official Service List |
| 53 | Travis     | Jacobson         | travis.jacobson@mdu.com                 | Great Plains Natural Gas Company |        | 400 N 4th St<br>Bismarck ND, 58501<br>United States  | Electronic Service |                           | No                | 21-565Official Service List |
| 54 | John       | Jaimez           | john.jaimez@hennepin.us                 |                                  |        | Environment & Energy Department<br>701 4th Ave S<br>Minneapolis MN, 55415<br>United States | Electronic Service |                           | No                | 21-565Official Service List |
| 55 | Alan       | Jenkins          | aj@jenkinsatlaw.com                     | Jenkins at Law                   |        | 2950 Yellowtail Ave.<br>Marathon FL, 33050<br>United States                                | Electronic Service |                           | No                | 21-565Official Service List |
| 56 | Richard    | Johnson          | rick.johnson@lawmoss.com                | Moss & Barnett                   |        | 150 S. 5th Street<br>Suite 1200<br>Minneapolis MN, 55402<br>United States                  | Electronic Service |                           | No                | 21-565Official Service List |
| 57 | Sarah      | Johnson Phillips | sPhillips@stoel.com                     | Stoel Rives LLP                  |        | 33 South Sixth Street<br>Suite 4200  | Electronic Service |                           | No                | 21-565Official              |

| #  | First Name | Last Name     | Email                              | Organization  | Agency                             | Address   | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name           |
|----|------------|---------------|------------------------------------|---|------------------------------------|---|--------------------|---------------------------|-------------------|-----------------------------|
|    |            |               |                                    |   |                                    | Minneapolis MN, 55402 United States                                     |                    |                           |                   | Service List                |
| 58 | Brendan    | Jordan        | bjordan@gpisd.net                  | Great Plains Institute & Bioeconomy Coalition of MN |                                    | 2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States             | Electronic Service |                           | No                | 21-565Official Service List |
| 59 | David      | Kailbourne    | edk@revlng.com                     | REV LNG, LLC  |                                    | 1002 Empson Rd Ulysses PA, 16948 United States                          | Electronic Service |                           | No                | 21-565Official Service List |
| 60 | D          | Kalmon        | dkalmon@mwmw.org                   | Mississippi Watershed Management Organization       |                                    | 2522 Marshall St NE Minneapolis MN, 55418-3329 United States            | Electronic Service |                           | No                | 21-565Official Service List |
| 61 | William    | Kenworthy     | will@votesolar.org                 |   |                                    | 1 South Dearborn St Ste 2000 Chicago IL, 60603 United States            | Electronic Service |                           | No                | 21-565Official Service List |
| 62 | Samuel B.  | Ketchum       | sketchum@kennedy-graven.com        | Kennedy & Graven, Chartered                         |                                    | 150 S 5th St Ste 700 Minneapolis MN, 55402 United States                | Electronic Service |                           | No                | 21-565Official Service List |
| 63 | Hudson     | Kingston      | hudson@curemn.org                  |   |                                    | PO Box 712 Ely MN, 55731 United States                                  | Electronic Service |                           | No                | 21-565Official Service List |
| 64 | Frank      | Kohlasch      | frank.kohlasch@state.mn.us         |   | Minnesota Pollution Control Agency | 520 Lafayette Rd N. St. Paul MN, 55155 United States                    | Electronic Service |                           | No                | 21-565Official Service List |
| 65 | Nicolle    | Kupser        | nkupser@greatermngas.com           | Greater Minnesota Gas, Inc.                         |                                    | 1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States           | Electronic Service |                           | No                | 21-565Official Service List |
| 66 | Brenda     | Kyle          | bkyle@stpaulchamber.com            | St. Paul Area Chamber of Commerce                   |                                    | 401 N Robert Street Suite 150 St Paul MN, 55101 United States           | Electronic Service |                           | No                | 21-565Official Service List |
| 67 | Carmel     | Laney         | carmel.laney@stoel.com             | Stoel Rives LLP                                     |                                    | 33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States    | Electronic Service |                           | No                | 21-565Official Service List |
| 68 | Peder      | Larson        | plarson@larkinhoffman.com          | Larkin Hoffman Daly & Lindgren, Ltd.                |                                    | 8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States | Electronic Service |                           | No                | 21-565Official Service List |
| 69 | Robert     | Lems          | administration@dm-t-cgs.com        | DMT Clear Gas Solutions                             |                                    | 19125 SW 125th Ct Tualatin OR, 97062 United States                      | Electronic Service |                           | No                | 21-565Official Service List |
| 70 | Rachel     | Leonard       | rachel.leonard@ci.monticello.mn.us | City of Monticello                                  |                                    | 505 Walnut St Ste 1 Monticello MN, 55362 United States                  | Electronic Service |                           | No                | 21-565Official Service List |
| 71 | Annie      | Levenson Falk | annielf@cubminnesota.org           | Citizens Utility Board of Minnesota                 |                                    | 332 Minnesota Street, Suite W1360 St. Paul MN,                          | Electronic Service |                           | No                | 21-565Official Service List |

| #  | First Name | Last Name   | Email                            | Organization                                | Agency  | Address   | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name           |
|----|------------|-------------|----------------------------------|---|---|---|--------------------|---------------------------|-------------------|-----------------------------|
|    |            |             |                                  |   |   | 55101<br>United States  |                    |                           |                   |                             |
| 72 | Amy        | Liberkowski | amy.a.liberkowski@xcelenergy.com | Xcel Energy                                 |   | 414 Nicollet Mall<br>7th Floor<br>Minneapolis MN, 55401-1993<br>United States               | Electronic Service |                           | No                | 21-565Official Service List |
| 73 | Jason      | Loos        | jason.loos@centerpointenergy.com | CenterPoint Energy Resources Corp.          |   | 505 Nicollet Mall<br>3rd Floor<br>Minneapolis MN, 55402<br>United States                    | Electronic Service |                           | No                | 21-565Official Service List |
| 74 | Kavita     | Maini       | kmairi@wi.rr.com                 | KM Energy Consulting, LLC                   |   | 961 N Lost Woods Rd<br>Oconomowoc WI, 53066<br>United States                                | Electronic Service |                           | No                | 21-565Official Service List |
| 75 | Emily      | Marshall    | emarshall@lourismarshall.com     | Miller O'Brien Jensen, PA                   |   | 120 S. 6th Street<br>Suite 2400<br>Minneapolis MN, 55402<br>United States                   | Electronic Service |                           | No                | 21-565Official Service List |
| 76 | Linda      | Martinez    | lmartinez@auri.org               | Agricultural Utilization Research Institute |   | null null, null<br>United States  | Electronic Service |                           | No                | 21-565Official Service List |
| 77 | Mary       | Martinka    | mary.a.martinka@xcelenergy.com   | Xcel Energy Inc                             |   | 414 Nicollet Mall<br>7th Floor<br>Minneapolis MN, 55401<br>United States                    | Electronic Service |                           | No                | 21-565Official Service List |
| 78 | Daryl      | Maxwell     | dmaxwell@hydro.mb.ca             | Manitoba Hydro                              |   | 360 Portage Ave FL 16<br>PO Box 815,<br>Station Main<br>Winnipeg MB,<br>R3C 2P4<br>Canada   | Electronic Service |                           | No                | 21-565Official Service List |
| 79 | Taylor     | McNair      | taylor@gridlab.org               |   |   | 668 Capp Street<br>San Francisco CA, 94110<br>United States                                 | Electronic Service |                           | No                | 21-565Official Service List |
| 80 | Sarah      | Mead        | sarah.mead@wecenergygroup.com    | MERC  |   | null null, null<br>United States  | Electronic Service |                           | No                | 21-565Official Service List |
| 81 | Joseph     | Meyer       | joseph.meyer@ag.state.mn.us      |   | Office of the Attorney General - Residential Utilities Division | Bremer Tower, Suite 1400<br>445 Minnesota Street<br>St Paul MN, 55101-2131<br>United States | Electronic Service |                           | No                | 21-565Official Service List |
| 82 | Stacy      | Miller      | stacy.miller@minneapolismn.gov   | City of Minneapolis                         |   | 350 S. 5th Street<br>Room M 301<br>Minneapolis MN, 55415<br>United States                   | Electronic Service |                           | No                | 21-565Official Service List |
| 83 | David      | Moeller     | dmoeller@allete.com              | Minnesota Power                             |   |   | Electronic Service |                           | No                | 21-565Official Service List |
| 84 | Andrew     | Moratzka    | andrew.moratzka@stoel.com        | Stoel Rives LLP                             |   | 33 South Sixth St Ste 4200<br>Minneapolis MN, 55402<br>United States                        | Electronic Service |                           | No                | 21-565Official Service List |

| #  | First Name | Last Name    | Email                            | Organization                                | Agency                            | Address   | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name           |
|----|------------|--------------|----------------------------------|---|-----------------------------------|---|--------------------|---------------------------|-------------------|-----------------------------|
| 85 | Evan       | Mulholland   | emulholland@mncenter.org         | Minnesota Center for Environmental Advocacy |                                   | 1919 University Ave<br>W Ste 515<br>Saint Paul MN, 55101<br>United States       | Electronic Service |                           | No                | 21-565Official Service List |
| 86 | Alan       | Muller       | alan@greendel.org                | Energy & Environmental Consulting           |                                   | 1110 West Avenue<br>Red Wing MN, 55066<br>United States                         | Electronic Service |                           | No                | 21-565Official Service List |
| 87 | Carl       | Nelson       | cnelson@mncee.org                | Center for Energy and Environment           |                                   | 212 3rd Ave N<br>Ste 560<br>Minneapolis MN, 55401<br>United States              | Electronic Service |                           | No                | 21-565Official Service List |
| 88 | David      | Niles        | david.niles@avantenergy.com      | Minnesota Municipal Power Agency            |                                   | 220 South Sixth Street<br>Suite 1300<br>Minneapolis MN, 55402<br>United States  | Electronic Service |                           | No                | 21-565Official Service List |
| 89 | Will       | Nissen       | wnissen@mncee.org                | Center for Energy and Environment           |                                   |   | Electronic Service |                           | No                | 21-565Official Service List |
| 90 | Samantha   | Norris       | samanthanorris@alliantenergy.com | Interstate Power and Light Company          |                                   | 200 1st Street<br>SE PO Box 351<br>Cedar Rapids IA, 52406-0351<br>United States | Electronic Service |                           | No                | 21-565Official Service List |
| 91 | M. William | O'Brien      | bobrien@mojlaw.com               | Miller O'Brien Jensen, P.A.                 |                                   | 120 S 6th St<br>Ste 2400<br>Minneapolis MN, 55402<br>United States              | Electronic Service |                           | No                | 21-565Official Service List |
| 92 | Ric        | O'Connell    | ric@gridlab.org                  | GridLab                                     |                                   | 2120 University Ave<br>Berkeley CA, 94704<br>United States                      | Electronic Service |                           | No                | 21-565Official Service List |
| 93 | Carol A.   | Overland     | overland@legalelectric.org       | Legalelectric - Overland Law Office         |                                   | 1110 West Avenue<br>Red Wing MN, 55066<br>United States                         | Electronic Service |                           | No                | 21-565Official Service List |
| 94 | Greg       | Palmer       | gpalmer@greatermngas.com         | Greater Minnesota Gas, Inc.                 |                                   | 1900 Cardinal Ln<br>PO Box 798<br>Faribault MN, 55021<br>United States          | Electronic Service |                           | No                | 21-565Official Service List |
| 95 | Jessica    | Palmer Denig | jessica.palmer-denig@state.mn.us |   | Office of Administrative Hearings | 600 Robert St<br>N<br>PO Box 64620<br>St. Paul MN, 55164<br>United States       | Electronic Service |                           | No                | 21-565Official Service List |
| 96 | Antonio    | Parisi       | aparisi@sacyr.com                | Sacyr Environment USA LLC                   |                                   | 3330 Washington Blvd<br>Ste 400<br>Arlington VA, 22201<br>United States         | Electronic Service |                           | No                | 21-565Official Service List |
| 97 | Bret       | Pence        | bretpence@mnipl.org              | Minnesota Interfaith Power and Light        |                                   | 106 Waverly Place<br>Duluth MN, 55803<br>United States                          | Electronic Service |                           | No                | 21-565Official Service List |
| 98 | Lisa       | Peterson     | lisa.r.peterson@xcelenergy.com   |   |                                   | 414 Nicollet Mall FL 7<br>Minneapolis MN, 55401<br>United States                | Electronic Service |                           | No                | 21-565Official Service List |

| #   | First Name     | Last Name                      | Email                                 | Organization                            | Agency  | Address  | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name           |
|-----|----------------|--------------------------------|---------------------------------------|---|---|--|--------------------|---------------------------|-------------------|-----------------------------|
| 99  | Catherine      | Phillips                       | catherine.phillips@wecenergygroup.com | Minnesota Energy Resources              |   | 231 West Michigan St<br>Milwaukee WI, 53203<br>United States                       | Electronic Service |                           | No                | 21-565Official Service List |
| 100 | J.             | Porter                         | greg.porter@nngco.com                 | Northern Natural Gas Company            |   | 1111 South 103rd St<br>Omaha NE, 68124<br>United States                            | Electronic Service |                           | No                | 21-565Official Service List |
| 101 | Kevin          | Pranis                         | kpranis@liunagroc.com                 | Laborers' District Council of MN and ND |   | 81 E Little Canada Road<br>St. Paul MN, 55117<br>United States                     | Electronic Service |                           | No                | 21-565Official Service List |
| 102 | Lauren         | Reeg                           | lreeg@rmi.org                         | RMI                                     |   | 806 N Pinyon Ct.<br>Hartland WI, 53029<br>United States                            | Electronic Service |                           | No                | 21-565Official Service List |
| 103 | Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us  |   | Office of the Attorney General - Residential Utilities Division | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul MN, 55101-2131<br>United States     | Electronic Service |                           | Yes               | 21-565Official Service List |
| 104 | Kevin          | Reuther                        | kreuther@mncenter.org                 | MN Center for Environmental Advocacy    |   | 26 E Exchange St,<br>Ste 206<br>St. Paul MN, 55101-1667<br>United States           | Electronic Service |                           | No                | 21-565Official Service List |
| 105 | Nathaniel      | Runke                          | nrunke@local49.org                    |   |   | 611 28th St.<br>NW<br>Rochester MN, 55901<br>United States                         | Electronic Service |                           | No                | 21-565Official Service List |
| 106 | Bjorgvin       | Saevarsson                     | bjorgvin@yorthgroup.com               | Yorth                                   |   | 500 East Grant Street<br>1207 #1207<br>Minneapolis MN, 55404<br>United States      | Electronic Service |                           | No                | 21-565Official Service List |
| 107 | Kevin          | Saville                        | kevin.saville@ftr.com                 | Citizens/Frontier Communications        |   | 2378 Wilshire Blvd.<br>Mound MN, 55364<br>United States                            | Electronic Service |                           | No                | 21-565Official Service List |
| 108 | Elizabeth      | Schmiesing                     | eschmiesing@winthrop.com              | Winthrop & Weinstine, P.A.              |   | 225 South Sixth Street<br>Suite 3500<br>Minneapolis MN, 55402<br>United States     | Electronic Service |                           | No                | 21-565Official Service List |
| 109 | Christine      | Schwartz                       | regulatory.records@xcelenergy.com     | Xcel Energy                             |   | 414 Nicollet Mall,<br>MN1180-07-MCA<br>Minneapolis MN, 55401-1993<br>United States | Electronic Service |                           | No                | 21-565Official Service List |
| 110 | Douglas        | Seaton                         | doug.seaton@umwlc.org                 | Upper Midwest Law Center                |   | 8421 Wayzata Blvd Ste 300<br>Golden Valley MN, 55426<br>United States              | Electronic Service |                           | No                | 21-565Official Service List |
| 111 | Patrick        | Serfass                        | pserfass@ttcorp.com                   | American Biogas Council                 |   | 1211 Connecticut Ave NW<br>Ste 650<br>Washington DC, 20036<br>United States        | Electronic Service |                           | No                | 21-565Official Service List |
| 112 | Patrick        | Serfass                        | info@americanbiogascouncil.org        | American Biogas Council                 |   | 1211 Connecticut Ave NW  | Electronic Service |                           | No                | 21-565Official              |

| #   | First Name   | Last Name         | Email                             | Organization   | Agency | Address  | Delivery Method       | Alternate Delivery Method | View Trade Secret | Service List Name                     |
|-----|--------------|-------------------|-----------------------------------|--|--------|--|-----------------------|---------------------------|-------------------|---------------------------------------|
|     |              |                   |                                   |  |        | Ste 650<br>Washington<br>DC, 20036<br>United States  |                       |                           |                   | Service List                          |
| 113 | Janet        | Shaddix<br>Elling | jshaddix@janetshaddix.com         | Shaddix And<br>Associates                                    |        | 7400 Lyndale<br>Ave S Ste 190<br>Richfield MN,<br>55423<br>United States                           | Electronic<br>Service |                           | No                | 21-<br>565Official<br>Service<br>List |
| 114 | Andrew<br>R. | Shedlock          | andrew.shedlock@kutakrock.com     | Kutak Rock LLP   |        | 60 South<br>Sixth St Ste<br>3400<br>Minneapolis<br>MN, 55402-<br>4018<br>United States             | Electronic<br>Service |                           | No                | 21-<br>565Official<br>Service<br>List |
| 115 | Beth         | Smith             | bsmith@greatermankato.com         | Greater<br>Mankato Growth                                    |        | 1961 Premier<br>Dr Ste 100<br>Mankato MN,<br>56001<br>United States                                | Electronic<br>Service |                           | No                | 21-<br>565Official<br>Service<br>List |
| 116 | Joshua       | Smith             | joshua.smith@sierraclub.org       |  |        | 85 Second St<br>FL 2<br>San Francisco<br>CA, 94105<br>United States                                | Electronic<br>Service |                           | No                | 21-<br>565Official<br>Service<br>List |
| 117 | Ken          | Smith             | ken.smith@districtenergy.com      | District Energy<br>St. Paul Inc.                             |        | 76 W Kellogg<br>Blvd<br>St. Paul MN,<br>55102<br>United States                                     | Electronic<br>Service |                           | No                | 21-<br>565Official<br>Service<br>List |
| 118 | Beth         | Soholt            | bsoholt@cleangridalliance.org     | Clean Grid<br>Alliance                                       |        | 570 Asbury<br>Street Suite<br>201<br>St. Paul MN,<br>55104<br>United States                        | Electronic<br>Service |                           | No                | 21-<br>565Official<br>Service<br>List |
| 119 | Anna         | Sommer            | asommer@energyfuturesgroup.com    | Energy Futures<br>Group                                      |        | PO Box 692<br>Canton NY,<br>13617<br>United States   | Electronic<br>Service |                           | No                | 21-<br>565Official<br>Service<br>List |
| 120 | Peggy        | Sorum             | peggy.sorum@centerpointenergy.com | CenterPoint<br>Energy  |        | 505 Nicollet<br>Mall<br>Minneapolis<br>MN, 55402<br>United States                                  | Electronic<br>Service |                           | No                | 21-<br>565Official<br>Service<br>List |
| 121 | Mark         | Spurr             | mospurr@fvbenergy.com             | International<br>District Energy<br>Association              |        | 222 South<br>Ninth St.,<br>Suite 825<br>Minneapolis<br>MN, 55402<br>United States                  | Electronic<br>Service |                           | No                | 21-<br>565Official<br>Service<br>List |
| 122 | Russ         | Stark             | russ.stark@ci.stpaul.mn.us        | City of St. Paul   |        | Mayor's Office<br>15 W. Kellogg<br>Blvd., Suite<br>390<br>Saint Paul<br>MN, 55102<br>United States | Electronic<br>Service |                           | No                | 21-<br>565Official<br>Service<br>List |
| 123 | Byron E.     | Starns            | byron.starns@stinson.com          | STINSON LLP  |        | 50 S 6th St<br>Ste 2600<br>Minneapolis<br>MN, 55402<br>United States                               | Electronic<br>Service |                           | No                | 21-<br>565Official<br>Service<br>List |
| 124 | Richard      | Stasik            | richard.stasik@wecenergygroup.com | Minnesota<br>Energy<br>Resources<br>Corporation<br>(HOLDING) |        | 231 West<br>Michigan St -<br>P321<br>Milwaukee<br>WI, 53203<br>United States                       | Electronic<br>Service |                           | No                | 21-<br>565Official<br>Service<br>List |
| 125 | Kristin      | Stastny           | kstastny@taftlaw.com              | Taft Stettinius &<br>Hollister LLP                           |        | 2200 IDS<br>Center<br>80 South 8th<br>Street<br>Minneapolis<br>MN, 55402<br>United States          | Electronic<br>Service |                           | No                | 21-<br>565Official<br>Service<br>List |

| #   | First Name | Last Name  | Email                          | Organization                                | Agency                 | Address  | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name           |
|-----|------------|------------|--------------------------------|---|------------------------|--|--------------------|---------------------------|-------------------|-----------------------------|
| 126 | James M    | Strommen   | jstrommen@kennedy-graven.com   | Kennedy & Graven, Chartered                 |                        | 150 S 5th St<br>Ste 700<br>Minneapolis<br>MN, 55402<br>United States                               | Electronic Service |                           | No                | 21-565Official Service List |
| 127 | Kent       | Sulem      | ksulem@mmua.org                |   |                        | 3131 Fernbrook Ln<br>N Ste 200<br>Plymouth MN,<br>55447-5337<br>United States                      | Electronic Service |                           | No                | 21-565Official Service List |
| 128 | Matthew    | Tomich     | tomich@energy-vision.org       | Energy Vision                               |                        | 138 E 13th St<br>New York NY,<br>10003<br>United States  | Electronic Service |                           | No                | 21-565Official Service List |
| 129 | Julie      | Voeck      | julie.voeck@nee.com            | NextEra Energy Resources, LLC               |                        | 700 Universe Blvd<br>Juno Beach<br>FL, 33408<br>United States                                      | Electronic Service |                           | No                | 21-565Official Service List |
| 130 | Amelia     | Vohs       | avohs@mncenter.org             | Minnesota Center for Environmental Advocacy |                        | 1919 University Avenue West<br>Suite 515<br>St. Paul MN,<br>55104<br>United States                 | Electronic Service |                           | No                | 21-565Official Service List |
| 131 | Sam        | Wade       | sam@rngcoalition.com           | Coalition for Renewable Natural Gas         |                        | 1017 L Street<br>#513<br>Sacramento<br>CA, 95814<br>United States                                  | Electronic Service |                           | No                | 21-565Official Service List |
| 132 | Jenna      | Warmuth    | jenna@rewiringamerica.org      | Rewiring America                            |                        | 3218 Georgia Ave NW,<br>Suite 1<br>Washington<br>DC, 20011<br>United States                        | Electronic Service |                           | No                | 21-565Official Service List |
| 133 | Nicole     | Westling   | nicole.westling@state.mn.us    |   | Department of Commerce | 85 7th Place<br>E<br>Suite 280<br>St Paul MN,<br>55001<br>United States                            | Electronic Service |                           | No                | 21-565Official Service List |
| 134 | Casey      | Whelan     | cwhelan@kinectenergy.com       | Kinect Energy Group                         |                        | 605 Highway<br>169 N Ste<br>1200<br>Plymouth MN,<br>55441<br>United States                         | Electronic Service |                           | No                | 21-565Official Service List |
| 135 | Laurie     | Williams   | laurie.williams@sierraclub.org | Sierra Club                                 |                        | Environmental Law Program<br>1536<br>Wynkoop St<br>Ste 200<br>Denver CO,<br>80202<br>United States | Electronic Service |                           | No                | 21-565Official Service List |
| 136 | Joseph     | Windler    | jwindler@winthrop.com          | Winthrop & Weinstine                        |                        | 225 South Sixth Street,<br>Suite 3500<br>Minneapolis<br>MN, 55402<br>United States                 | Electronic Service |                           | No                | 21-565Official Service List |
| 137 | Tim        | Wulling    | t.wulling@earthlink.net        |   |                        | 1495 Raymond Ave.<br>Saint Paul<br>MN, 55108<br>United States                                      | Electronic Service |                           | No                | 21-565Official Service List |
| 138 | Mariko     | Yatsuhashi | myatsuhashi@mncee.org          | Center for Energy and Environment           |                        | 212 N 3rd Ave<br>Suite 560<br>Minneapolis<br>MN, 55404<br>United States                            | Electronic Service |                           | No                | 21-565Official Service List |

| #   | First Name | Last Name | Email                      | Organization           | Agency | Address   | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name           |
|-----|------------|-----------|----------------------------|------------------------|--------|---|--------------------|---------------------------|-------------------|-----------------------------|
| 139 | Grant      | Zimmerman | gzimmerman@ampamericas.com | Amp Americas           |        | 811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States     | Electronic Service |                           | No                | 21-565Official Service List |
| 140 | Kurt       | Zimmerman | kwz@ibew160.org            | Local Union #160, IBEW |        | 2909 Anthony Ln St Anthony Village MN, 55418-3238 United States | Electronic Service |                           | No                | 21-565Official Service List |
| 141 | Emily      | Ziring    | eziring@stlouispark.org    | City of St. Louis Park |        | 5005 Minnetonka Blvd St. Louis Park MN, 55416 United States     | Electronic Service |                           | No                | 21-565Official Service List |
| 142 | Patrick    | Zomer     | pat.zomer@lawmoss.com      | Moss & Barnett PA      |        | 150 S 5th St #1200 Minneapolis MN, 55402 United States          | Electronic Service |                           | No                | 21-565Official Service List |