

January 22, 2026

Sasha Bergman, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**RE: Proposed Modification in the Matter of a Commission Review of Utility Performance
Incentives for Energy Conservation**

Docket No. E,G999/CI-08-133

Dear Ms. Bergman:

The Minnesota Department of Commerce, Division of Energy Resources (Department), Center for Energy and Environment (CEE), and Fresh Energy, as the “Joint Commenters,” respectfully submit this letter to the Minnesota Public Utilities Commission (Commission) regarding the Joint Commenters’ Proposal for a 2027-2029 Demand-Side Management (DSM) Financial Incentive Mechanism for implementation beginning in 2027.

The Joint Commenters recommend several minor modifications to the proposed 2027-2029 ECO incentive mechanism in response to the recent ECO Technical Reference Manual (TRM) Version 5.0 decision, filed January 9, 2026.¹ The Assistant Commissioner’s decision increases the residential TRM furnace baseline from 80 percent AFUE to 90 percent AFUE and the Joint Commenters believe the resulting impact to the first-year savings and net benefits generated by gas utility ECO portfolios merits a slight recalibration of the proposed 2027-2029 ECO incentive.

I. SUMMARY OF THE TRM FURNACE BASELINE CHANGE

On October 29, 2025, the Department of Commerce released a proposed decision for the ECO TRM Version 5.0, which included an increase in the residential TRM furnace baseline from 80

¹ Department’s January 9, 2026 Decision. Docket Number E,G999/CIP-18-694.

percent AFUE to 90 percent AFUE.² The furnace baseline change was ultimately approved on January 9, 2026. The Assistant Commissioner’s decision also clarified that, “in cases where a utility can verify the existing furnace being replaced is non-condensing, the utility could propose using the federal minimum standard of 80 percent AFUE as the measure baseline.”³

During several rounds of comments, stakeholders emphasized that the change in furnace baseline would result in significant decreases in per-measure savings for key measures, namely high-efficiency furnaces, which currently make up a large share of each gas utility’s residential programming. Insulation and air sealing, air source heat pumps (ASHPs), and other measures would also see a decrease in per-measure savings, although not as severe as that anticipated for high-efficiency furnaces. Essentially, if gas utilities made no changes to their ECO portfolios but recalculated per-measure savings using the updated furnace baseline of 90 percent AFUE, portfolio-wide first-year savings and net benefits would decrease significantly.

The Joint Commenters recognize that the ECO financial incentive proposal for the 2027-2029 Triennial was developed in collaboration with utilities and other stakeholders without accounting for a potential change to the TRM furnace baseline. The metrics included in the proposed gas incentive were calibrated using 2024 portfolio achievements and the 2018 Minnesota Energy Efficiency Potential Study⁴, which assumed an 80 percent AFUE furnace baseline when calculating energy savings, and were designed to set challenging yet realistic goals for utility performance. To account for the new baseline assumptions and ensure that the goals set by the incentive mechanism remain obtainable, the Joint Commenters recommend making several modifications to the proposed 2027-2029 gas incentive mechanism.

The Joint Commenters emphasize that the modifications proposed herein are intended as a recalibration to account for the TRM Version 5.0 furnace baseline update. The Joint Commenters anticipate that the ECO financial incentive mechanism will continue to evolve, as it has in every triennial cycle to date, to reflect new technologies, baseline energy assumptions, potential study analysis, state policy goals, and the balance of overall incentive levels with utility ECO performance.

II. ESTIMATED PORTFOLIO IMPACTS

Three portfolio metrics — portfolio-wide first-year energy savings, insulation and air sealing first-year energy savings, and portfolio-wide MN Test net benefits — will be impacted by the

² Department’s October 29, 2025 Proposed Decision. Docket Number E,G999/CIP-18-694.

³ Page 67 of the Department’s January 9, 2026 Decision. Docket Number E,G999/CIP-18-694.

⁴ Center for Energy and Environment, et al. *Minnesota Energy Efficiency Potential Study: 2020–2029*. Prepared for Minnesota Department of Commerce, Division of Energy Resources, 4 Dec. 2018.

change in furnace baseline and have a direct influence on the outcome of the utility incentive under the mechanism proposed by the Joint Commenters. When preparing for the possibility of a change in the furnace baseline, CenterPoint and MERC provided CEE with estimates of the expected impact to these metrics if they were recalculated using a 90 percent AFUE furnace baseline rather than an 80 percent AFUE baseline. CEE estimated the impact on Xcel’s metrics using Xcel’s technical assumptions and by applying the anticipated decrease in net benefits provided by CenterPoint.⁵ Table 1 summarizes these estimated changes.

Table 1: Anticipated Changes to ECO Achievements due to the TRM Furnace Baseline Change

Utility	Estimated Reduction (% change)		
	Portfolio-Wide First-Year Savings (Dth)	Insulation and Air Sealing First-Year Savings	Net Benefits
CenterPoint Energy	-9.5%	-11%	-20%
Xcel Energy	-7.5%	-11%	-20%
MERC	-7.1%	-4.7% ⁶	-13.3%

Importantly, the estimates in Table 1 do not account for the possibility that utilities will propose to use an 80 percent AFUE baseline when the furnace being replaced is verifiably non-condensing. This approach was proposed by CEE in initial comments on the TRM furnace baseline and supported in the Assistant Commissioner’s January 9, 2026 decision.⁷ If this approach is approved and implemented, the total decline in first-year savings and net benefits may not be as severe as estimated in Table 1.

The estimates also do not account for the fact that utilities will likely adapt their portfolios in response to the baseline change and may offset some of the decline in first-year energy savings, net benefits, and insulation and air sealing first-year savings by increasing investment in less-affected measures or introducing new areas of programming. As a result, the estimates above may overestimate the actual decline in savings and net benefits that will occur.

The Joint Commenters anticipate that utilities will respond to the furnace baseline update by evolving their ECO portfolios toward measures with durable long-term value, including insulation and air sealing, air-source heat pumps, and income-qualified programs. The proposed

⁵ The estimates for Xcel Energy’s first-year savings do not account for potential impacts to ASHP measures.

⁶ MERC predicts a smaller decrease in insulation and air sealing savings due to a portion of these savings being classified as commercial savings, a segment that will not be impacted by the residential TRM furnace baseline change.

⁷ Page 67 of the Department’s January 9, 2026 Decision. Docket Number E,G999/CIP-18-694.

incentive recalibration is intended to maintain appropriate performance incentives as portfolios adjust.

III. PROPOSED MODIFICATIONS TO THE GAS INCENTIVE

Modification 1: Insulation and Air Sealing First-Year Savings Threshold and Goal

The Joint Commenters recommend adjusting the achievement threshold and goal for the insulation and air sealing metric to account for the estimated 11 percent decline in per-measure savings for insulation and air sealing measures. The Joint Commenters used the program potential savings for insulation and air sealing measures from the 2018 Minnesota Energy Efficiency Potential Study to inform the achievement threshold and goal of the insulation and air sealing metric. The 2018 Potential Study assumes an 80 percent AFUE furnace baseline, as this was the furnace baseline in place at the time, meaning the program potential savings from the study do not reflect the same assumptions that will be used during the 2027-2029 Triennial.

The Joint Commenters recommend recalibrating the insulation and air sealing threshold and goal to reflect the 11 percent reduction anticipated for insulation and air sealing measures to ensure the metric sets realistic and accurate goals for utility performance. Table 2 shows the proposed modifications to the achievement threshold and goal.⁸

Table 2: Modified Insulation and Air Sealing Achievement Threshold and Goal (First-Year Savings as a % of Average Residential Retail Sales)⁹

Utility	Achievement Threshold	Achievement Goal
MERC	0.06% 0.05%	0.18% 0.16%
CenterPoint Energy	0.11% 0.10%	0.32% 0.29%
Xcel Energy	0.11% 0.09%	0.32% 0.28%

Since each utility’s insulation and air sealing savings will also decrease, the Joint Commenters do not anticipate a major change in incentive outcomes following this adjustment. However, it will ensure that the achievement threshold and goal for this metric remain realistic and attainable.

⁸ The insulation and air sealing achievement threshold and goal are calculated as a percentage of average residential retail sales (2022-2024). To recalibrate the threshold and goal, the Joint Commenters reduced the program potential Dth savings for each utility by 11 percent and recalculated the percentages.

⁹ In reply comments, the Joint Commenters adopted a recommendation from MERC to use the utility-specific program potential values for the insulation and air sealing threshold and goals, rather than the utility-wide average. Table 2 reflects this change for each utility.

Modification 2: Net Benefits Scale

The Joint Commenters propose that the minimum percentage of net benefits, awarded when utilities perform at the achievement threshold in each metric, and the net benefits cap be slightly increased. With this adjustment, the utilities would earn a slightly higher percentage of net benefits for reaching each achievement level. This adjustment would not alter the achievement threshold or goal for any of the metrics, but by increasing the percentage of net benefits awarded for each achievement level, would acknowledge that maintaining or exceeding past performance levels will become more challenging for utilities, especially in the first several years following the implementation of the 90 percent AFUE furnace baseline. As a reminder, the ECO financial incentive mechanism will be reevaluated and updated ahead of the 2030-2032 Triennial.

As initially proposed, the incentive-wide net benefits scale, which encompasses all three metrics, begins at 1.9 percent and is capped at 5 percent. For the proposed modification, the Joint Commenters recommend raising the incentive-wide net benefits minimum and maximum by 0.5 percent, resulting in a minimum of 2.4 percent and a maximum of 5.5 percent. The additional 0.5 percent of net benefits should be distributed between the three metrics according to the existing metric weights (i.e. 60 percent of the total net benefits for first-year energy savings, 20 percent for insulation and air sealing, and 20 percent for low-income spending).

Table 3 shows the modified gas incentive structure compared to the original, including the proposed changes to both the net benefits minimum and the insulation and air sealing metric. In Table 3, the total net benefits awarded for first-year energy savings, insulation and air sealing savings, and low-income spending increased by 0.3 percent, 0.1 percent, and 0.1 percent, respectively, totaling a 0.5 percent increase across the board.

Table 3: Overview of Proposed Modifications to Gas Incentive Mechanism

First-Year Energy Savings (% of Retail Sales)			% of Total Net Benefits Awarded
0.70% (threshold) ¹⁰			1.14% 1.44%
0.80%			1.51% 1.81%
0.90%			1.88% 2.18%
1.00%			2.26% 2.56%
1.10%			2.63% 2.93%
1.20% (goal) ¹¹			3.0% 3.3% (cap)
Insulation and Air Sealing First-Year Energy Savings (% of Residential Sales)			% of Total Net Benefits Awarded
MERC	CenterPoint	Xcel Energy	
0.06% 0.05% (threshold)	0.11% 0.10% (threshold)	0.11% 0.09% (threshold)	0.38% 0.48%
0.08% 0.07%	0.15% 0.14%	0.15% 0.13%	0.50% 0.60%
0.11% 0.10%	0.19% 0.17%	0.19% 0.17%	0.63% 0.73%
0.13% 0.12%	0.24% 0.21%	0.24% 0.21%	0.75% 0.85%
0.16% 0.14%	0.28% 0.25%	0.28% 0.24%	0.88% 0.98%
0.18% 0.16% (goal)	0.32% 0.29% (goal)	0.32% 0.28% (goal)	1.0% 1.10% (cap)
Low-Income Spend (% of Residential GOR)			% of Total Net Benefits Awarded
1.0% (threshold)			0.38% 0.48%
1.2%			0.50% 0.60%
1.4%			0.63% 0.73%
1.6%			0.75% 0.85%
1.8%			0.88% 0.98%
2.0% (goal)			1.0% 1.10% (cap)

IV. ESTIMATED INCENTIVE IMPACTS

The Joint Commenters tested several scenarios to first understand the estimated impact of the 90 percent AFUE furnace baseline on each utility’s incentive outcome and then understand how

¹⁰ The achievement threshold refers to the achievement level a utility must reach before they can begin earning an incentive for a given metric.

¹¹ The achievement goal refers to the achievement level that aligns with the maximum percentage of net benefits a utility can earn for a given metric.

much the proposed modifications would mitigate this impact. To do so, the Joint Commenters estimated the incentive outcomes by plugging actual 2024 program achievements into the unmodified incentive mechanism and then adjusting the 2024 program achievements to reflect the anticipated decrease in first-year energy savings, insulation and air sealing energy savings, and net benefits following the furnace baseline change. The Joint Commenters then incorporated the proposed modifications to the insulation and air sealing metric and net benefits scale as outlined in this filing, essentially testing how much these modifications would mitigate the anticipated decrease in the incentive outcomes.

Table 4 summarizes the incentive outcomes expected for each utility in these three scenarios (i.e. using the baseline 2024 achievements, using the reduced 2024 achievements, and using the reduced 2024 achievements with the proposed modifications to the incentive mechanism). These estimates all rely on the estimated impacts summarized in Table 1, which were either provided by the utilities or estimated by CEE.

Table 4: Estimated Impact of TRM Furnace Baseline Change and Proposed Modifications on the DSM Incentive

Scenario	Estimated Incentive Outcome			% Change from Baseline Scenario		
	CenterPoint	Xcel (Gas)	MERC ¹²	Center-Point	Xcel (Gas)	MERC
Unmodified Mechanism + Actual 2024 Achievements (Baseline Scenario) ¹³	\$7,435,872	\$4,031,320	\$1,063,343	--	--	--
Unmodified Mechanism + Reduced 2024 Achievements	\$5,755,998	\$3,224,230	\$844,696	-23%	-20%	-21%
Modified Mechanism + Reduced 2024 Achievements	\$6,368,994	\$3,556,393	\$1,009,428	-14%	-12%	-5%

Although the Joint Commenters recognize that the modifications do not bring the incentive outcomes entirely back to the baseline scenario, it is important to note that the scenarios in

¹² MERC provided CEE with updated insulation and air sealing estimates that include commercial savings. The estimated incentive outcomes reflect these updated values and therefore differ from previous filings.

¹³ The baseline scenario represents the estimated incentive outcomes expected if the utilities' 2024 performance levels (which assumed an 80 percent AFUE furnace baseline) were input into the unmodified, proposed 2027-2029 mechanism. These values are equivalent to those in the Joint Commenters' Reply Comments but reflect MERC's updated 2024 insulation and air sealing savings.

Table 4 do not account for possible changes in utility performance and programming and instead rely on 2024 achievements as inputs.

Importantly, only MERC met the achievement threshold for the insulation and air sealing metric in the scenarios above. If the utilities met or surpassed the achievement threshold for the insulation and air sealing metric, they would unlock an additional share of net benefits, and the mitigating effect of the modifications would be stronger across the utilities. Increasing the minimum percentage of net benefits places additional value on meeting the achievement threshold in each metric, meaning utilities would earn a larger reward than originally proposed when they first unlock a metric.

If the proposed modifications were adopted and CenterPoint and Xcel managed to meet the achievement threshold for the insulation and air sealing metric, CenterPoint would only see a 0.3 percent decrease in its incentive compared to the baseline scenario and Xcel would only see a 2.0 percent decrease. So long as the insulation and air sealing metric is adjusted to account for the 11 percent decrease in insulation and air sealing savings, meeting the achievement threshold for this metric will continue to be an attainable goal. The utilities can further increase their incentive outcomes by earning above the minimum achievement threshold for insulation and air sealing savings and by investing more in low-income programs to increase their low-income spending incentive. Increased investment in insulation and air sealing and low-income programs represent key pathways for utilities to sustain incentive performance while advancing equity and affordability objectives.

The scenarios represented in Table 4 also do not account for the possibility that utilities will propose to use an 80 percent AFUE furnace baseline for measures that replace verifiable non-condensing furnaces, an approach supported by the Assistant Commissioner's January 9, 2026 decision. If utilities can capture the full savings from these measures, the anticipated decrease in total first-year savings and net benefits may not be as extreme as predicted, meaning the incentive would also not decline as dramatically. The estimates used to generate the incentive outcomes in Table 4 assume that all affected measures will use a 90 percent AFUE furnace baseline.

Due to the reasons outlined above, the Joint Commenters find the proposed recalibration to be reasonable, despite not mitigating the entire anticipated decrease in incentive outcomes.

V. CONCLUSION

The Department, CEE, and Fresh Energy appreciate the opportunity to propose two modifications to the incentive mechanism to account for the anticipated impact of the furnace baseline change approved by the Assistant Commissioner on January 9, 2026.

To capture these proposed modifications, the Department, CEE, and Fresh Energy propose the following changes to Recommendation B from our September 15, 2025 reply comments,¹⁴ with the changes shown in red and underlined for emphasis.¹⁵

B. For natural gas utilities:

- a. Allow utilities to begin collecting an incentive for each metric when they reach the following performance levels:
 - i. First-year energy savings of 0.7 percent of weather-normalized average retail sales, at which the utility can collect 1.44 percent of portfolio net benefits.
 - ii. Insulation and air sealing first-year energy savings equal to one-third of the utility's average 2027-2029 insulation and air sealing first-year energy savings program potential (calculated using the 2018 Minnesota Energy Efficiency Potential Study and recalibrated for a 90 percent AFUE furnace baseline), at which the utility can collect 0.48 percent of portfolio net benefits.
 - iii. Low-income spending of 1.0 percent of residential gross operating revenue (GOR), at which the utility can collect 0.48 percent of portfolio net benefits.
- b. Set metric-specific net benefit caps at:
 - i. 3.3 percent of portfolio net benefits for first-year energy savings, awarded for an achievement of 1.2 percent of weather-normalized average retail sales or higher.
 - ii. 1.1 percent of portfolio net benefits for insulation and air sealing first-year energy savings, awarded for an achievement equal to the utility's insulation and air sealing first-year energy savings program potential (calculated using the 2018 ECO Potential Study and recalibrated for a 90 percent AFUE furnace baseline).
 - iii. 1.1 percent of portfolio net benefits for low-income spending, awarded for an achievement of 2 percent of average residential Gross Operating Revenue or higher.
- c. Use linear interpolation to award the appropriate percentage of net benefits for performance levels between the achievement threshold and net benefits cap.

¹⁴ Department, CEE, and Fresh Energy's September 15, 2025 Joint Reply Comments.

¹⁵ The Revised Attachment A file submitted with this modification request shows the incentive mechanism revised according to the proposed modifications and with 2024 achievement levels adjusted to reflect anticipated decreases in first-year energy savings, insulation and air sealing energy savings, and net benefits.

- d. Set a total Net Benefits Cap equal to 5.5 percent of portfolio net benefits. The total Net Benefits Cap corresponds with maximum achievement in all three metrics.
- e. Set an Expenditures Cap of 20 percent of total portfolio expenditures, which increases to 25 percent if the utility achieves first-year energy savings of 1.2 percent of weather-normalized average retail sales or higher.

Thank you for considering our comments. Please contact me at myatsuhashi@mncee.org with any questions.

Sincerely,

/s/ Mariko Yatsuhashi
Regulatory Policy Advocate
Center for Energy and Environment

/s/ Ashly McFarlane
Senior Manager of Market Transformation
Regulatory Policy & Forecasting
Center for Energy and Environment

/s/ Will Nissen
Director of Policy
Center for Energy and Environment

/s/ Dr. Sydnie M. Lieb
Assistant Commissioner of Regulatory
Analysis
Minnesota Department of Commerce

/s/ Anthony Fryer
Director, Energy Conservation &
Optimization
Minnesota Department of Commerce

/s/ Caitlin Eichten
Director, Building Energy Transition
Fresh Energy

AFFIDAVIT OF SERVICE

DOCKET NUMBER E,G999/CI-08-133

I, Mariko Yatsunami, hereby certify that on this 22nd day of January 2026, I served *Proposed Modification in the Matter of a Commission Review of Utility Performance Incentives for Energy Conservation* in Docket Number E,G999/CI-08-133 on the following persons on the attached Service Lists by:

X placing such filing in envelopes, properly addressed, and depositing the same in the Post Office at the City of Minneapolis, for delivery by the United States Post Office as directed by said envelopes.

X electronic filing

/s/ Mariko Yatsunami

Mariko Yatsunami

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	8-133Official
2	Anjali	Bains	bains@fresh-energy.org	Fresh Energy		408 Saint Peter Ste 220 Saint Paul MN, 55102 United States	Electronic Service		No	8-133Official
3	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	8-133Official
4	Annika	Brindel	abrindel@nhtinc.org	National Housing Trust		1101 30th Street NW Ste 100A Washington DC, 20007 United States	Electronic Service		No	8-133Official
5	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	8-133Official
6	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	8-133Official
7	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	8-133Official
8	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	8-133Official
9	Justin	Fay	fay@fresh-energy.org	Fresh Energy		408 St. Peter St Ste 220 St. Paul MN, 55102 United States	Electronic Service		No	8-133Official
10	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		Yes	8-133Official
11	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	8-133Official
12	Metric	Giles	metriccsp@gmail.com	Community Stabilization Project		501 Dale St N Saint Paul MN, 55101 United States	Electronic Service		No	8-133Official
13	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	8-133Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Laura	Goldberg	lgoldberg@nrdc.org	Natural Resources Defense Council		20 N. Upper Wacker Dr. Suite 1600 Chicago IL, 60606 United States	Electronic Service		No	8-133Official
15	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	8-133Official
16	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	8-133Official
17	Tiana	Heger	theher@mnpower.com	Minnesota Power		30 W. Superior Street Duluth MN, 55802 United States	Electronic Service		No	8-133Official
18	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	8-133Official
19	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	8-133Official
20	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	8-133Official
21	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	8-133Official
22	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	8-133Official
23	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	8-133Official
24	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	8-133Official
25	James	Phillippo	james.phillippo@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		PO Box 19001 Green Bay WI, 54307-9001 United States	Electronic Service		No	8-133Official
26	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	8-133Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
27	Scott	Reimer	reimer@federatedrea.coop	Federated Rural Electric Assoc.		77100 US Highway 71 PO Box 69 Jackson MN, 56143 United States	Electronic Service		No	8-133Official
28	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	8-133Official
29	Michael	Sachse	michael.sachse@opower.com	OPOWER		1515 N. Courthouse Rd, 8th Floor Arlington VA, 22201 United States	Electronic Service		No	8-133Official
30	Bruce	Sayler	bruces@connexusenergy.com	Connexus Energy		14601 Ramsey Boulevard Ransey MN, 55303 United States	Electronic Service		No	8-133Official
31	Jeffrey	Springer	jeff.springer@dairylandpower.com	Dairyland Power Cooperative		3200 East Ave S La Crosse WI, 54601 United States	Electronic Service		No	8-133Official
32	Grey	Staples	gstaples@mendotagroup.com	The Mendota Group LLC		1830 Fargo Lane Mendota Heights MN, 55118 United States	Electronic Service		No	8-133Official
33	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	8-133Official
34	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	8-133Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
2	Kathy	Baerlocher	kathy.baerlocher@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
3	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
4	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
5	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	ECO SPECIAL SERVICE LIST
6	William	Black	wblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
7	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
8	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
9	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	ECO SPECIAL SERVICE LIST
10	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
11	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	ECO SPECIAL SERVICE LIST
12	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
13	Bradley	Davison	bradley.davison@mdu.com	Great Plains Natural Gas Company			Electronic Service		No	ECO SPECIAL SERVICE LIST
14	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
15	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
16	Greg	Ernst	gaerst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
17	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
18	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	ECO SPECIAL SERVICE LIST
19	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
20	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
21	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
22	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
23	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
24	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
25	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
26	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
27	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
28	Zach	Klabo	zach.klabo@mdu.com	Great Plains Natural Gas Company			Electronic Service		No	ECO SPECIAL SERVICE LIST
29	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
30	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
31	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
32	Martin	Lepak	martin.lepak@aeoa.org	Arrowhead Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
33	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
34	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
35	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906	Electronic Service		No	ECO SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
36	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
37	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	ECO SPECIAL SERVICE LIST
38	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
39	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
40	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
41	Larry	Oswald	larry.oswald@mdu.com	Great Plains Natural Gas Company		105 W Lincoln Ave PO Box 176 Fergus Falls MN, 56538-9001 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
42	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
43	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
44	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
45	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	ECO SPECIAL SERVICE LIST
46	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501	Electronic Service		No	ECO SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
47	Laura	Silver	laura.silver@state.mn.us		Department of Commerce	85 7th Place E, Suite 500 St. Paul MN, 55101 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
48	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
49	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
50	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
51	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
52	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
53	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
54	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
55	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST
56	Cristina	Zuniga	czuniga@otpc.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538 United States	Electronic Service		No	ECO SPECIAL SERVICE LIST