

October 31, 2025

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket Nos. E999/CI-07-1199; G008, G002, G011/CI-23-117; and G999/CI-21-565

Dear Ms. Bergman,

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

In the Matter of Establishing an Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minn. Stat. §216H.06; In the Matter of a Commission Investigation into Gas Utility Resource Planning; In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals.

The Investigation in Docket No. G999/CI-21-565 was initiated by the Commission on July 23, 2021.

In a Notice of Amended Notice of Comment Period (NOC) dated October 11, 2023 in Docket No. G008, G002, G011/CI-23-117, the Minnesota Public Utilities Commission (Commission) requested comments on the scope of content for Xcel Energy, CenterPoint Energy, and Minnesota Energy Resource Corporation (MERC) natural gas resource plans.

In a Notice of Comment Period (NOC) dated August 25, 2025 the Commission requested comments on the appropriate data source and values for the regulatory cost of greenhouse gas emissions for Xcel Energy, CenterPoint Energy, and Minnesota Energy Resource Corporation's upcoming gas integrated resource plans.

- The Department recommends that CenterPoint, Xcel, and MERC provide information requested herein in their respective Reply Comments and is available to answer any questions the Minnesota Public Utilities Commission may have. The Department also notes that the Commission could require the use of the values for the regulatory cost of greenhouse gas emissions for Xcel, CenterPoint, and MERC's upcoming gas integrated resource plans using the values established for Minn. Stat. § 216H.06 and last approved in Docket No. E999/CI-07-1199 in the Commission's December 2023 Regulatory Costs Order with the determination that they are appropriate in gas IRP proceedings.

October 31, 2025

Docket Nos. E999/CI-07-1199; G008, G002, G011/CI-23-117; and G999/CI-21-565

- Because of the interplay between Minn. Stat. §216H and Minn. Stat. § 216B.2427-.2428 and the definition of emissions as described herein, as well as the overall emissions reduction goal specified by the legislature, the Department recommends that Commission use the current values as established in Docket 07-1199.

Sincerely,

/s/ Dr. SYDNIE LIEB

Assistant Commissioner of Regulatory Analysis

SS/ar

Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket Nos. E999/CI-07-1199; G008, G002, G011/CI-23-117; and G999/CI-21-565.

I. INTRODUCTION

The Legislature enacted the Natural Gas Innovation Act (NGIA or the Act) in 2021.¹ On June 26, 2021, Governor Walz signed the Natural Gas Innovation Act (NGIA) into law.² Article 8, Section 27, directs the Minnesota Public Utilities Commission (Commission), by August 1, 2021, to initiate a proceeding to evaluate changes to natural gas utility regulatory and policy structures needed to meet or exceed Minnesota's greenhouse gas emissions reductions goals. On July 23, 2021, the Commission established this docket to address those concerns.³ The Natural Gas Innovation Act also requires that by June 1, 2022, the Commission issue an order establishing a framework to calculate lifecycle greenhouse gas emissions intensities of each innovative resource.⁴ The Commission opened a second proceeding to develop the framework in Docket No. G999/CI-21-566.⁵

Minnesota's NGIA permits the state's natural gas utilities to file voluntary innovation plans with the Commission to explore the development or provision of innovative resources that will contribute to achieving the state's greenhouse gas and renewable energy goals.

The Commission issued a Notice of Extended Comment Period (NOC) dated May 07, 2024 in Docket No. G008, G002, G011/CI-23-117.⁶ The May 7, 2024 NOC included one issue and several topics; - one in particular as follows:

- Issue – What filing requirements should the Commission adopt for Xcel Energy, CenterPoint Energy, and Minnesota Energy Resource Corporation (MERC) natural gas resource plans?

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

² The NGIA is codified in statute as Minn. Stat. §§ 216B.2427 and 216B.2428.

³ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*.

⁴ Minn. Stat. § 216B.2428.

⁵ *In the Matter of Establishing Frameworks to Compare Lifecycle Greenhouse Gas Emissions Intensities of Various Resources, and to Measure Cost-Effectiveness of Individual Resources and of Overall Innovative Plans*. Also See the Commission's *Notice of Stakeholder Engagement Timeline and Docket Process*, April 11, 2023, Docket Nos. G999/CI-21-565 and G008, G002, G011/CI-23-117, (eDockets) [20234-194673-01](#)

⁶ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals. In the Matter of a Commission Investigation into Gas Utility Resource Planning*, May 7, 2024, Docket Nos. G999/CI-21-565 and G008, G002, G011/CI-23-117, (eDockets) [20245-206461-01](#), (hereinafter "Commission May 7, 2024 Notice").

- Topics –
 3. For Xcel Energy, what, if any, direction should the Commission give regarding Xcel’s analysis and reporting on methane emissions?⁷

II. PROCEDURAL BACKGROUND

February 17, 2023	The Commission found that natural gas resource planning was in the public interest and initiated a proceeding to establish the content and procedural requirements for natural gas resource plans for CenterPoint Energy Minnesota Gas (CenterPoint or CPE), Northern States Power Company doing business as Xcel Energy (Xcel), and Minnesota Energy Resources Corporation (MERC), and to identify existing regulatory requirements that should be included in future resource planning. ⁸
October 11, 2023	The Commission posted a notice of comment period on the scope of content for Xcel, CenterPoint, and MERC’s natural gas resource plans. ⁹
October 24, 2023	Citizens Utility Board (CUB) filed a Petition in response to the Commission’s October 11, 2023 Notice. ¹⁰
October 27, 2023	CUB filed a correction to its Petition’s Attachment B. ¹¹

⁷ For Xcel Energy only, the Commission moved reporting of the methane emission information in the Environmental Performance Outcome Metrics – methane emissions from the Company’s distribution system, upstream methane emissions, and methane emissions across the full fuel cycle – to Natural Gas Resource Plan dockets. *See Order Accepting 2021 and 2022 Reports, Suspending Decisions and Baselines and Targets, and Modifying Reporting Requirements*, January 26, 2024, Docket No. E002/CI-17-401 at Ordering Paragraph 9. (eDockets) [20241-202711-01](#).

⁸ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers; In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions; In the Matter of the Petition by Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities Co., for Approval of Rule Variances to Recover High Natural Gas Costs from February 2021; In the Matter of Petition of Northern States Power Company d/b/a Xcel Energy to Recover February 2021 Natural Gas Costs; In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions, Order Requiring Actions To Mitigate Impacts From Future Natural Gas Price Spikes, Setting Filing Requirements, and Initiating A Proceeding To Establish Gas Resource Planning Requirements*, February 17, 2023, Docket Nos. G-999/CI-21-135, G-008/M-21-138, G-004/M-21-235, G-002/CI-21-610, and G-011/CI-21-611 (eDockets) [20232-193249-05](#) at Ordering Paragraph 16.

⁹ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals. In the Matter of a Commission Investigation into Gas Utility Resource Planning*, October 11, 2023, Docket Nos. G999/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [202310-199514-01](#), (hereinafter “Commission October 11, 2023 Notice”).

¹⁰ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals. In the Matter of a Commission Investigation into Gas Utility Resource Planning*, October 24, 2023, Docket Nos. G999/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [202310-199867-01](#), [202310-199867-02](#), [202310-199867-03](#), [202310-199867-04](#), [202310-199867-05](#), [202310-199867-06](#), (hereinafter “CUB Petition”).

¹¹ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals. In the Matter of a Commission Investigation into Gas Utility Resource Planning*, October 27, 2023, Docket Nos. G999/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [202310-199867-01](#), [202310-199867-02](#), (hereinafter “CUB Petition Corrected Attachment B”).

November 30, 2023	Ten parties in addition to the Department submitted Comments in this proceeding: 1) Center for Energy and the Environment (CEE); 2) CPE; 3) Clean Energy Organizations (CEO); 4) International Union of Operating Engineers Local 49 (IUOE); 5) Laborers' International Union of North America (LIUNA); 6) Midwest Energy Efficiency Alliance (MEEA); 7) City of Minneapolis (Minneapolis); 8) MERC; 9) the Office of the Attorney General Residential Utilities Division (OAG-RUD) and 10) Xcel.
December 19, 2023	The Commission issued an Order addressing environmental and regulatory costs in Docket 07-1199. ¹²
January 2, 2024	On or before this date, eleven parties in addition to the Department filed Reply Comments in this proceeding responding to the initial round of Comments: 1) Minnesota Building and Construction Trades Council; 2) CenterPoint; 3) OAG-RUD; 4) Minnesota IBEW State Council; 5) Xcel; 6) MERC; 7) CUB; 8) IUOE; 9) North Star Policy Action; 10) CEO; and 11) LIUNA.
March 27, 2024	The Commission issued an Order establishing a framework for natural gas utility integrated resource planning. ¹³
April 29, 2024	The Commission issued a Notice requesting the utilities file Straw Proposals for filing requirements of natural gas integrated resource plans. ¹⁴
May 7, 2024	The Commission's May 7, 2024 Notice required the Straw Proposals be filed by May 31, 2024, Comments on the Straw Proposals be filed by June 28, 2024, and Reply Comments filed by July 19, 2024. ¹⁵
May 31, 2024	CenterPoint, Xcel and MERC filed their Straw Proposals responding to the issues in the May 7, 2024 Notice.

¹² *In the Matter of Establishing an Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minnesota Statutes § 216H.06. In the Matter of Establishing an Updated 2022 Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minn. Stat. § 216H.06. In the Matter of the Further Investigation into Environmental and Socioeconomic Costs Under Minn. Stat. § 216B.2422, Subdivision 3, Order Addressing Environmental and Regulatory Costs*, December 19, 2023, Docket Nos. E-999/CI-07-1199 (docket 07-1199); E-999/DI-22-236 and E-999/CI-14-643, (eDockets) [202312-201351-02](#), (hereinafter "December 2023 Regulatory Costs Order").

¹³ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals. In the Matter of a Commission Investigation into Gas Utility Resource Planning, Order Establishing Framework For Natural Gas Utility Integrated Resource Planning*, March 27, 2024, Docket Nos. G999/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [20243-204681-01](#), (hereinafter "March 2024 Framework Order").

¹⁴ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals. In the Matter of a Commission Investigation into Gas Utility Resource Planning*, April 29, 2024, Docket Nos. G999/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [20244-206067-01](#), (hereinafter "Commission April 29, 2024 Notice").

¹⁵ Commission May 7, 2024 Notice, (eDockets) [20245-206461-01](#).

- June 28, 2024 Eight parties in addition to the Department submitted Comments in this proceeding responding to the Straw Proposals: 1) Building Decarbonization Coalition (BDC); 2) CEE; 3) CenterPoint; 4) CEO; 5) CUB; 6) MERC; 7) OAG-RUD; and 8) Xcel. Not all parties commented on all issues or the same issues.
- July 19, 2024 Eleven parties in addition to the Department submitted Reply Comments in this proceeding: 1) BDC; 2) CEE; 3) CenterPoint; 4) CEO; 5) CUB; 6) MERC; 7) OAG-RUD; 8) Xcel; 9) IUOE; 10) Various Local Governments; and 11) CURE et al [CURE, MN350 Action, Minnesota Interfaith Power & Light, BDC, and Ayada Leads (collectively, CURE, et al.)]. Not all parties commented on all issues or the same issues.
- July 22, 2024 LIUNA submitted Reply Comments in this proceeding.
- October 9, 2024 The Commission approved CenterPoint’s NGIA plan and all proposed pilots and R&D projects, but with several modifications.¹⁶ CPE’s proposed plan included 17 pilots that would result in the deployment of up to seven of the eight innovative resources identified by the NGIA as well as seven research and development (R&D) projects of which some will explore the eighth resource, power-to-ammonia. The Plan was predicted to reduce or avoid roughly 1.2 million metric tons of carbon dioxide equivalent (CO₂e) emissions and create 3,000 full-time equivalent jobs in Minnesota, with a five-year budget of \$105.7 million.
- October 28, 2024 The Commission issued an Order clarifying and expanding framework for natural gas utility integrated resource planning.¹⁷ The Commission set Xcel’s first Gas IRP filing at July 1, 2026, CenterPoint’s at July 1, 2027, and MERC’s by July 1, 2028. The Order had the following relevant ordering paragraphs, in part as follows:
11. CenterPoint, MERC, and Xcel shall consider lifecycle GHG emission factors from filed Natural Gas Innovation Act (NGIA) Plans in resource analysis to ensure lower emissions on a lifecycle basis.

¹⁶ *In the Matter of CenterPoint Energy’s Natural Gas Innovation Plan, Order Approving Natural Gas Innovation Plan With Modifications*, October 9, 2024, Docket No. G-008/M-23-215, (eDockets) [202410-210845-01](#), (hereinafter “CPE NGIA Order”).

¹⁷ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals. In the Matter of a Commission Investigation into Gas Utility Resource Planning, Order Clarifying and Expanding Framework For Natural Gas Integrated Resource Planning*, October 28, 2024, Docket Nos. G999/CI-21-565 and G008,G002,G011/CI-23-117, (eDockets) [202410-211361-02](#), (hereinafter “October 2024 Framework Order”).

12. CenterPoint, MERC, and Xcel must report methane emissions from natural gas distribution system operations using available reporting protocols in the natural gas integrated resource plan until a system specific leakage estimate derived from measured leakage from the utility distribution system is available. Within 12 months of the date of this order, each utility shall file a report including the capital and O&M costs of procedures for system specific leakage rates measurements and a description of their current practices.
13. CenterPoint, MERC, and Xcel must include in their gas IRPs additional information about upstream emissions data availability.
14. CenterPoint, MERC, and Xcel must include in each integrated resource plan a narrative description of how its preferred plan will support and serve Minnesota's greenhouse-gas-emission- reduction goals.
15. CenterPoint, MERC, and Xcel must use the most recent externality values adopted by the Commission in Docket No. E-999/CI-14-643 to estimate environmental externality costs of resource options in gas IRPs.
16. The Commission delegates authority to the Executive Secretary to open a comment period in Docket Number E-999/CI-07-1199 to consider and determine the appropriate data source and values for the regulatory cost of greenhouse gas emissions for natural gas resource planning through the upcoming docket to update the regulatory cost of carbon for electric resource planning.

May 16, 2025

The Commission approved Xcel's 2023 NGIA plan.¹⁸ Xcel's approved innovation plan has a budget of approximately \$55,380,000 spread across 14 pilot projects and a number of research and development projects. The Plan was predicted to reduce or avoid roughly 927,000 metric tons of CO₂e emissions and create 417 full-time equivalent jobs in Minnesota.

August 25, 2025

The Commission issued a Notice in this proceeding regarding the regulatory costs of greenhouse gas emissions.¹⁹ The August 2025 Notice included several topics which are listed below, and one issue as follows:

¹⁸ *In the Matter of Xcel Energy's Natural Gas Innovation Plan, Order Approving Natural Gas Innovation Plan With Modifications*, May 16, 2025, Docket No. G-002/M-23-518, (eDockets) [20255-219016-01](#), (hereinafter "Xcel NGIA Order").

¹⁹ *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals. In the Matter of a Commission Investigation into Gas Utility Resource Planning. In the Matter of Establishing an Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minnesota Statutes § 216H.06.*, August 25, 2025, Docket Nos. G999/CI-21-565; G008,G002,G011/CI-23-117, and E-999/CI-07-1199 (docket 07-1199) (eDockets) [20258-222376-01](#), (hereinafter "Commission August 2025 Notice").

“What are the appropriate data source and values for the regulatory cost of greenhouse gas emissions for Xcel Energy, CenterPoint Energy, and Minnesota Energy Resource Corporation’s upcoming gas integrated resource plans?”

September 8, 2025 The Department and Minnesota Pollution Control Agency (MPCA) request comments on the range of cost estimates for the future cost of carbon dioxide (CO₂) regulation on electricity generation, with the comments to be filed in Docket No. E999/DI-25-345.²⁰

Topic(s) open for comment:

- Are the values established for Minn. Stat. § 216H.06 and last approved in Docket No. E999/CI-07-1199 in the Commission’s December 19, 2023 Order appropriate for use in Xcel Energy, CenterPoint Energy, and Minnesota Energy Resource Corporation’s upcoming IRPs?
- If the current values established in the instant docket are not appropriate, what data source and update timeframe should be used for the regulatory cost of GHG emissions values for natural gas IRPs?
- How does your recommendation account for the timing of a Commission decision on this topic with the need for modeling inputs for Xcel’s Gas IRP due July 1, 2026?
- Are there other issues or concerns related to this matter?

Given the issue and topics above from the Commission’s August 2025 Notice that is based on Ordering paragraph 16 of the October 2024 Framework Order, the Department provides its analysis below.

III. DEPARTMENT ANALYSIS

A. MINN. STAT. §216H.

A.1. Background on Minn. Stat. §216H.06

Minn. Stat. §216H.06 states:²¹

By January 1, 2008, the Public Utilities Commission shall establish an estimate of the likely range of costs of future carbon dioxide regulation on electricity generation. The estimate, which may be made in a commission order, must be used in all electricity generation resource acquisition proceedings. The estimates, and annual updates, must be made following

²⁰ *In the Matter of Establishing an Updated Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minnesota Statutes § 216H.06.*, September 8, 2025, Docket Nos. E999/DI-25-345 (docket 25-345), and E-999/CI-07-1199 (docket 07-1199) (eDockets) [20259-222802-01](#), (hereinafter “Commission September 2025 Notice”).

²¹ [Minn. Stat. § 216H, subd. 6](#) (2024).

informal proceedings conducted by the commissioners of commerce and pollution control that allow interested parties to submit comments.

The Minnesota Pollution Control Agency (MPCA) and the Minnesota Department of Commerce, Division of Energy Resources (Commerce) (collectively, the Agencies) requested comments on the likely cost range, the date the costs are expected to be incurred, and the relationship between the regulatory cost range and the externality cost values most recently established in Docket No. E999/CI- 07-1199.²²

Thus, the above section of the Statute requires the Commission to estimate the future regulatory costs of carbon dioxide. The Department will separately address the Commission's September 2025 Notice in Docket No. 25-345 and Docket No. 07-1199, after comments are received by November 7, 2025.

A.2. Background on Minn. Stat. §216H.01

Minn. Stat. §216H.01, Subd. 2 states:²³

"Statewide greenhouse gas emissions" include emissions of carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride emitted by anthropogenic sources within the state and from the generation of electricity imported from outside the state and consumed in Minnesota. Carbon dioxide that is injected into geological formations to prevent its release to the atmosphere in compliance with applicable laws, and carbon dioxide associated with the combustion of fuels other than coal, petroleum, and natural gas are not counted as contributing to statewide greenhouse gas emissions.

The above section not only provides the definition of statewide gas emissions but also specifies that carbon dioxide associated with the combustion of natural gas is to be counted as contributing to statewide greenhouse gas emissions.

A.3. Background on Minn. Stat. §216H.02

Minn. Stat. §216H.02, Subd. 1 states:²⁴

- (a) It is the goal of the state to reduce statewide greenhouse gas emissions across all sectors producing greenhouse gas emissions by at least the following amounts, compared with the level of emissions in 2005:
- (1) 15 percent by 2015;
 - (2) 30 percent by 2025;
 - (3) 50 percent by 2030; and
 - (4) to net zero by 2050.

²² Commission September 2025 Notice at pages 1-3. (eDockets) [20259-222802-01](#).

²³ [Minn. Stat. § 216H.01, subd. 2](#) (2024).

²⁴ [Minn. Stat. § 216H.02, subd. 1](#) (2024).

- (b) To the maximum extent practicable, actions taken to achieve these goals must avoid causing disproportionate adverse impacts to residents of communities that are or have been incommensurately exposed to pollution affecting human health and environmental quality.
- (c) The targets under paragraph (a) must be reviewed annually by the commissioner of the Pollution Control Agency, taking into account the latest scientific research on the impacts of climate change and strategies to reduce greenhouse gas emissions published by the Intergovernmental Panel on Climate Change. The commissioner must forward any recommended changes to the targets to the chairs and ranking minority members of legislative committees with primary jurisdiction over climate change and environmental policy.
- (d) For the purposes of the subdivision, "net zero" means:
 - (1) statewide greenhouse gas emissions equal to zero; or
 - (2) when annual anthropogenic emissions of greenhouse gases to the atmosphere are balanced by removals over a specific period.

The above section seeks to control emissions by setting targets to reduce greenhouse gas emissions via the emissions reductions goal.

A.4. Background on Minn. Stat. §216H.07

Minn. Stat. §216H.07states:²⁵

Subdivision 1. **Definition.** For the purpose of this section, "reductions" means the greenhouse gas emissions-reductions goals specified in section 216H.02, subdivision 1.

Subd. 2. **Purpose.** This section is intended to create a nonexclusive, regular, mandated process for the state to develop policies to attain the greenhouse gas reduction goals specified in section 216H.02.

Subd. 3. **Biennial report.** (a) By January 15 of each odd-numbered year, the commissioners of commerce and the Pollution Control Agency shall jointly report to the chairs and ranking minority members of the legislative committees with primary policy jurisdiction over energy and environmental issues the most recent and best available evidence identifying the level of reductions already achieved and the level necessary to achieve the reductions timetable in section 216H.02.

²⁵ [Minn. Stat. § 216H.07](#) (2024).

(b) The report must be in easily understood nontechnical terms.

Subd. 4.[Repealed, 2012 c 272 s 98]

Subd. 5. **Reduction principles.** Legislation proposed under subdivision 4 must be based on the following principles:

- (1) the greenhouse gas emissions-reduction goals specified in section 216H.02, subdivision 1, must be attained;
- (2) the reductions must be attained on a schedule that keeps pace with the reduction timetable required by section 216H.02, subdivision 1;
- (3) conservation, including ceasing some activities, doing some activities less, and doing some activities more energy efficiently, is the first choice for reduction;
- (4) public education is a key component;
- (5) all levels of government should lead by example;
- (6) strategies that may lead to economic dislocation should be phased in and should be coupled with strategies that address the dislocation; and
- (7) there must be coordination with other federal and regional greenhouse gas emissions-reduction requirements so that the state benefits and is not penalized from its reduction activities.

The above section describes attainment with greenhouse gas reduction goals specified in Minn. Stat. § 216H.02. To track the progress towards the emission reduction goals, the section also establishes and requires a biennial report in addition to describing the development of policies towards attainment of the emissions reduction goals. The latest biennial report to the legislature was published in January 2025.²⁶ Prior biennial reports, nine in all since 2009, are also available.²⁷

B. MINN. STAT § 216B.2427

As mentioned earlier, the NGIA is codified in statute as Minn. Stat. §§ 216B.2427-.2428. Minn. Stat. § 216B.2427, Subdivision 1 states in part the following:²⁸

Subdivision 1. **Definitions.** (a) For the purposes of this section and section 216B.2428, the following terms have the meanings given.

[...] (h) "Greenhouse gas emissions" means emissions of carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride emitted by anthropogenic sources within Minnesota and from the generation of electricity imported from outside the state and consumed in Minnesota, excluding carbon dioxide that is injected into

²⁶ MPCA and Department of Commerce. Greenhouse gas emissions in Minnesota 2005-2022: *Biennial inventory report tracking the state's greenhouse gas emissions contributing to climate change. Report to Legislature*, (January 2025). Available at: <https://www.lrl.mn.gov/docs/2025/mandated/250138.pdf>

²⁷ Available at: https://www.lrl.mn.gov/mndocs/mandates_detail?orderid=1719 (last visited October 21, 2025).

²⁸ [Minn. Stat. § 216B.2427, subd. 1](#) (2024).

geological formations to prevent its release to the atmosphere in compliance with applicable laws.

- (i) "Innovative resource" means biogas, renewable natural gas, power-to-hydrogen, power-to-ammonia, carbon capture, strategic electrification, district energy, and energy efficiency.
- (j) "Lifecycle greenhouse gas emissions" means the aggregate greenhouse gas emissions resulting from the production, processing, transmission, and consumption of an energy resource.

The above greenhouse gas emissions defined under Minn. Stat. § 216B.2427, Subd., 1 are substantively similar as the "statewide greenhouse gas emissions" defined earlier under Minn. Stat. §216H.01, Subd. 2. The Commission provided its interpretation, further clarification, and definition of the greenhouse gas emissions in its January 2025 Order as follows:²⁹

The use of passive voice in the definition of "carbon capture" is also relevant because it does not limit the source of greenhouse gas emissions. The only limitation is found in the definition of "greenhouse gas emissions," which provides, in part:

"Greenhouse gas emissions" means emissions of carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride *emitted by anthropogenic sources* within Minnesota [...].⁸ (Emphasis added.)

With this being the only constraint, an anthropogenic⁹ source of greenhouse gas emissions could range from a large industrial facility to a gas stove in someone's home. The legislature could have limited the source of greenhouse gas emissions to industrial or commercial facilities that are more conducive to carbon capture technologies that capture emissions before they enter the atmosphere, but a lack of such a limitation in the definition allows for greenhouse gas emissions to be captured from any possible anthropogenic source. As a practical matter, capturing greenhouse gas emissions after they enter the atmosphere may be the only way to capture emissions from some anthropogenic sources, such as gas stoves.

Removing greenhouse gases from the atmosphere is also a permissible way to achieve the state's greenhouse gas goal, which the NGIA seeks to advance. The NGIA requires utilities to include in their innovation plans:

the innovative resource or resources the utility plans to implement to contribute to meeting the state's greenhouse gas and renewable

²⁹ *In the Matter of CenterPoint Energy's Natural Gas Innovation Plan, Order Denying Reconsideration*, January 13, 2025, Docket No. G-008/M-23-215, (eDockets) [20251-213872-01](#), (hereinafter "January 2025 Order").

energy goals, including those established in section 216C.05, subdivision 2, clause (3), and section 216H.02, subdivision 1[...].¹⁰

The latter of those sections refers to the state’s greenhouse gas emissions-reduction goal, which ultimately aims to reduce emissions to net zero by 2050.¹¹ The statute provides that “net zero” means “(1) statewide greenhouse gas emissions equal to zero; or (2) when annual anthropogenic emissions of greenhouse gases to the atmosphere are balanced by removals over a specific period.”¹² In other words, removing greenhouse gases from the atmosphere is one way to achieve net zero under the statute.

8. Minn. Stat. § 216B.2427, subd. 1(h).

9. “Anthropogenic” means “originating in or caused by human activities.” Oxford English Dictionary, s.v. “anthropogenic (adj.), sense 2,” July 2023, <https://doi.org/10.1093/OED/3613848754>.

10. Minn. Stat. § 216B.2427, subd. 2(a)(1).

11. Minn. Stat. § 216H.02, subd. 1.

12. Id. at subd. 1(d).

The various above sections do the following:

- provide the definition of statewide greenhouse gas emissions;
- specify that carbon dioxide associated with the combustion of natural gas is to be counted as contributing to statewide greenhouse gas emissions;
- define and articulate that capturing greenhouse gas emissions after they enter the atmosphere may be the only way to capture emissions from some anthropogenic sources, such as gas stoves; and
- removing greenhouse gases from the atmosphere is one way to achieve net zero under the statute.

C. COMMISSION’S GENERAL AUTHORITY

In general, the Commission exercises different functions and powers, such as For example, in ratemaking the Commission acts in both its quasi-judicial and quasi-legislative capacities: As a quasi-judicial body it engages in traditional fact-finding, and as a quasi-legislative body it applies its institutional expertise and judgment to resolve issues that turn on both factual findings and policy judgments. The Commission’s powers and functions are delineated in Minn. Stat § 216A. Minn. Stat. §216A.05, Subdivisions 1, 3, and 4 states:³⁰

Subdivision 1. **Legislative and quasi-judicial functions.** The functions of the commission shall be legislative and quasi-judicial in nature. It may make such investigations and determinations, hold such hearings, prescribe such rules, and issue such orders with respect to the control and conduct of the

³⁰ [Minn. Stat. § 216A.05](#) (2024).

businesses coming within its jurisdiction as the legislature itself might make but only as it shall from time to time authorize. It may adjudicate all proceedings brought before it in which the violation of any law or rule administered by the Department of Commerce is alleged.

Subd. 3. **Manner of fact-finding.** The commission may:

- (1) subpoena, in the same manner a district court summons is served, at such time and place as it may designate, any books, papers, or accounts kept by any regulated business within or without the state, or compel production of verified copies in lieu thereof;
- (2) prepare all forms or blanks for the purpose of obtaining information which it may deem necessary or useful in the proper exercise of its authority and duties in connection with regulated businesses, and prescribe the time and manner within which such blanks and forms shall be completed and filed with it;
- (3) inspect, at all reasonable times, and copy the books, records, memoranda, correspondence, or other documents and records of any business under its jurisdiction;
- (4) examine, under oath, any officer, agent, or employee thereof in relation to its business and affairs.

Subd. 4. **Performance of commission functions.** The commission shall exercise each and every legislative function imposed by law on it.

The Commission has broad authority in the exercise of its powers and functions as outlined in state statutes.

D. MOST RECENT COMMISSION ORDER IN DOCKET 07-1199

In its December 2023 Regulatory Costs Order, the Commission established the cost of carbon regulation (\$5 - \$75 per ton emitted) and found that utilities would likely not bear those costs before 2028.

As to the estimated range, the Commission stated:³¹

Minn. Stat. § 216H.06 directs the Commission to establish an estimate of the likely range of costs that future regulation of CO₂ will impose on electricity generation, and to periodically update that estimate.

In its last CO₂ Regulatory Cost Order, the Commission set a range of \$5 to \$25 per short ton of CO₂ emitted. But the Commission delayed implementation of this cost until 2025 to reflect the anticipated delay in the adoption and implementation of new environmental regulations.

³¹ December 2023 Regulatory Costs Order at pages 10-12. (eDockets) [202312-201351-02](#),

[...] Having considered the evidence and arguments presented by the parties, the Commission is persuaded to revise its range of costs that future regulation of CO₂ will impose on electricity generation to \$5 to \$75 per short ton, to take effect in 2028.

As to the escalation factor, the Commission stated:³²

Various parties recommend that the Commission also adopt a formula permitting regulatory costs to escalate with inflation, or with the cost of renewable energy credits. **The Commission has not previously found a need to permit its regulatory cost range to escalate and is not persuaded of the need to add an automatic escalation formula now—especially with a new upper limit of \$75 per short ton. And given the amount of changes in the regulatory environment, the Commission is not persuaded that the alleged benefits of creating self-adjusting regulatory cost estimates would justify the added complexity. For ease of administration, the Commission will set the cost range at fixed values of \$5 to \$75 per short ton; when those costs require further adjustment, Minn. Stat. § 216H.06 sets forth the process to do so.**

The Commission provided further guidance on modeling future regulatory costs, in ordering paragraphs 1, 4, and 8 as follows:³³

1. The Commission hereby quantifies and establishes the range of regulatory costs of carbon dioxide emissions as \$5 to \$75 per short ton effective 2028 and thereafter.
4. When modeling environmental externality values and future regulatory costs for purposes of analyzing scenarios in a resource plan, utilities shall do the following:
 - A. Model future regulatory costs in Encompass (or a comparable method using other models) in a manner that influences the selection of resource options.
 - B. Model environmental externality values as post-processing add-ons under Encompass (or a comparable method using other models).
 - C. Identify the future regulatory costs of each scenario as part of its Present Value of Revenue Requirement.
 - D. Identify the externality costs of each scenario separately from the Present Value of Revenue Requirement.
8. In future dockets initiated to acquire resources for generating electricity, or as otherwise ordered by the Commission, utilities

³² *Id.*, at 14.

³³ *Id.*, at 18-20.

shall apply all regulatory cost assumptions and modeling scenarios ordered in this proceeding.

With all the above information and guidance, the Department answers the Commission's August 2025 Notice questions below.

E. COMMISSION'S AUGUST 2025 NOTICE

E.1. Are the values established for Minn. Stat. § 216H.06 and last approved in Docket No. E999/CI-07-1199 in the Commission's December 19, 2023 Order appropriate for use in Xcel Energy, CenterPoint Energy, and Minnesota Energy Resource Corporation's upcoming IRPs?

In response to the above question, a strict interpretation of Minn. Stat. §216H.06 described in Section A above implies that those values would not be applicable to natural gas utilities that are involved in distributing natural gas. Minn. Stat. §216H.06 requires the Commission to establish an estimate of the likely range of costs of future carbon dioxide regulation on electricity generation and does not apply to natural gas utilities.

To the extent the natural gas utilities supply natural gas as a fuel to regulated electric utilities involved in electric generation, those regulated electric utilities will reflect the costs of future CO₂ regulation in their respective Integrated Resource Plan (IRP) proceedings.

However, based on the following facts:

- the Commission's broad general authority as discussed earlier in Section C above;
- the greenhouse gas emissions reduction goals from all sectors and attainment set out by the Minnesota legislature as further described in Sections A and B above; and
- the definitions of emissions emitted by anthropogenic sources within Minnesota and the removal of those emissions from the atmosphere;

The Commission could require the use of the values for the regulatory cost of greenhouse gas emissions for Xcel, CenterPoint, and MERC's upcoming gas integrated resource plans using the values established for Minn. Stat. § 216H.06 and last approved in Docket No. E999/CI-07-1199 in the Commission's December 2023 Regulatory Costs Order with the determination that they are appropriate in gas IRP proceedings. Thus, because of the interplay between Minn. Stat. §216H and Minn. Stat. § 216B.2427 and 2428 and the definition of emissions as described above, as well as the overall emissions reduction goal specified by the legislature, the Department recommends that Commission use the current values as established in Docket 07-1199.

E.2. If the current values established in the instant docket are not appropriate, what data source and update timeframe should be used for the regulatory cost of GHG emissions values for natural gas IRPs?

In response to the above question, please see the above and below discussion.

E.3. How does your recommendation account for the timing of a Commission decision on this topic with the need for modeling inputs for Xcel's Gas IRP due July 1, 2026?

The Department's recommendation that the Commission could require the use of the values for the regulatory cost of greenhouse gas emissions using the values established for Minn. Stat. § 216H.06 and last approved in Docket No. E999/CI-07-1199 in the Commission's December 2023 Regulatory Costs Order; will allow Xcel to incorporate these established values in its modeling inputs.

Once the Agencies seeks feedback in Dockets 25-345 and 07-1199 based on the Commission's September 2025 Notice, and the Agencies provide their analysis and recommendations to the Commission; and once the Commission makes its determinations on the regulatory costs of greenhouse gas emissions during the course of the proceedings in Docket 07-1199; CenterPoint will have enough time to incorporate those values in its upcoming IRP due on July 1, 2027. Similarly, MERC will have enough time to incorporate those values in its upcoming IRP due on July 1, 2028.

E.4. Are there other issues or concerns related to this matter?

Yes, there are other issues that need clarification related to this matter as described below.

E.4.1. Modeling Inputs

Xcel has experience in modeling not only through its electric utility's IRP but also through its natural gas utility and subsidiary in Colorado, doing business as Public Service Company of Colorado (PSCo). PSCo files natural gas IRP's in Colorado.

It is the Department's understanding that future regulatory costs are considered as future internal costs and treated just like any other variable cost and are therefore considered by the model when it selects units to dispatch. Externality values, however, are considered separately and applied to the suite of resources a model run selects so that externality costs are considered when ranking the cost of each plan. This method is consistent with what the costs represent – future internal costs, and externality costs. The Department is not aware that altering this method would impact the selection of an expansion plan. However, modeling the two types of costs in a way that does not reflect the costs they represent could invalidate the modeling results to the extent the results change.

Thus, the Department seeks validation and confirmation from Xcel in its Reply Comments in this proceeding that this is also Xcel's understanding for its upcoming natural gas IRP.

In addition, in its Reply Comments, Xcel should also identify, explain, and discuss both its internal accounting and Federal Energy Regulatory Commission's (FERC) accounts and sub-accounts that will be used to track and record its internal costs and future regulatory costs associated with its upcoming natural gas IRP.

E.4.2. Reporting on Methane Emissions

In the October 2024 Framework Order, ordering paragraphs 12 through 14 require Xcel, CPE, and MERC to report methane emissions, providing upstream emissions data availability and a narrative description of how their preferred plans will support and serve Minnesota's greenhouse-gas-emission-

reduction goals. The Environmental Protection Agency (EPA) has a Mandatory Greenhouse Gas Reporting Rule (GHGRP).³⁴

Using data from GHGRP³⁵, the Department obtained the following information for CPE, Xcel, and MERC, as shown in Table1.

Table 1: LDC GHG QUANTITY (METRIC TONS CO2e)

PARENT COMPANIES	CPE ³⁶	XCEL ³⁷	MERC ³⁸
GHGRP ID	1004086	1003203	1007381
YEAR	GHG QUANTITY (METRIC TONS CO2e)		
2010	8,589,548	4,574,918	3,834,903
2011	17,456,644	9,504,863	3,984,893
2012	17,137,123	9,684,774	4,107,660
2013	20,159,150	10,840,277	4,648,238
2014	19,548,223	10,238,603	4,951,931
2015	18,891,607	9,688,953	4,430,710
2016	18,970,133	9,873,620	4,352,658
2017	19,063,313	10,326,500	4,670,312
2018	20,534,110	11,988,143	5,014,984
2019	21,510,574	13,746,940	4,963,669
2020	18,081,028	12,511,210	9,639,278
2021	19,003,794	12,849,463	10,097,955
2022	21,219,009	11,881,712	10,060,014
2023	20,210,500	12,261,788	10,073,570

³⁴ Code of Federal Regulations (CFR), Title 40 Chapter 1, Subchapter C, Part 98, Subpart NN and Subpart W. Available at: <https://www.ecfr.gov/current/title-40/chapter-1/subchapter-C/part-98/subpart-NN> (Last visited October 24, 2025); and <https://www.ecfr.gov/current/title-40/chapter-1/subchapter-C/part-98/subpart-W> (Last visited October 24, 2025).

³⁵ Available at: <https://enviro.epa.gov/envirofacts/ghg/search/results?q=N4lg7glgJg5ggpFwMIEMA2aQC4Bm6DOcANCFBPgA5ooCeSATHAnlytsAL4l4DGAYnDRweCCAHSAduxBiKoydhC8laJjQD60ECVnyJANXQBxOlu0y54iQJT0eACwAqNCqawgARnBgQJAdS27EC4QeDEYehQKexobOyCsUBQoKH04fHxpAC8iCiQxKDCq2TU9PwAGV8i8x41MxleMSMJBB0GkHwEFGZpJsLFAFKAOXNC-B5GSwV3Qd8JdLFu4JJS%2BijHZ1dFLx9-QJWQCSozEikUCB58DYTOEjSKMxPrCRgATThbASERK2wAbQATAAGQEAZiilMBAEZlaDgXDoQiQdDYSjAYiiSiACyIlgCsilAbliAOxwwEYIEATkRAA4ALokQp4IxoBAAJTgi2evg%2BX0Ewj02ChEJADyeLxgABFPIAggtFFDsQBAYG05XQ2m1exwAC230Ffyw-xAOPMgPMYPMSpMhOtZsZnSMHl1TGY6wFvxmID1bpYmRihBETwNXqkxtNeJAjvwzoEwY9PyFEbxdpizootgQoeT-0daDEYAAoq6MIZ2ShXm4ESB7BAYPYS%2BR8OXK-BhWDgV3u-cuRlFDA%2BN0EEZ8PkBu4AIIYYJAA> (Last visited October 24, 2025).

³⁶ CPE for year 2010 reported for Subpart NN; and for years 2011-2023 reported for Subparts NN and W in aggregate.

³⁷ Xcel for year 2010 reported for Subpart NN; and for years 2011-2023 reported for Subparts NN and W in aggregate.

³⁸ MERC for years 2010-2019 reported for Subpart NN; and for years 2020-2023 reported for Subparts NN and W in aggregate.

The Department recommends that CPE, Xcel, and MERC provide the following information in their respective Reply Comments, as follows:

- 1) Consistent with the information supplied by the LDC to EPA's GHGRP, provide information for 2024;
- 2) Provide a short narrative description of how the values listed in the table above, and inclusive of data for 2024, were tabulated and calculated;
- 3) Provide the natural gas deliveries (in Dekatherms) for the years 2010 through 2024 segregated by end-user (that is separately for residential customers, commercial customers, industrial customers, and electric generating facilities);
- 4) Provide the natural gas deliveries (in Dekatherms) for the years 2010 through 2024 further segregated between sales and transport categories by end-user (that is separately for residential customers, commercial customers, industrial customers, and electric generating facilities); and
- 5) To identify, explain, and discuss both the internal accounting and FERC accounts and sub-accounts that are used to track and record the internal costs used in reporting the data above.

IV. DEPARTMENT RECOMMENDATIONS

Based on the above analysis and requests for information, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. MINN. STAT. §216H.

- A.1. The Department will separately address the Commission's September 2025 Notice in Docket No. 25-345 and Docket No. 07-1199, after comments are received by November 7, 2025.

E. COMMISSION'S AUGUST 2025 NOTICE

- E.1. The Commission could require the use of the values for the regulatory cost of greenhouse gas emissions for Xcel, CenterPoint, and MERC's upcoming gas integrated resource plans using the values established for Minn. Stat. § 216H.06 and last approved in Docket No. E999/CI-07-1199 in the Commission's December 2023 Regulatory Costs Order with the determination that they are appropriate in gas IRP proceedings.
- Thus, because of the interplay between Minn. Stat. §216H and Minn. Stat. § 216B.2427 and 2428 and the definition of emissions as described above, as well as the overall emissions reduction goal specified by the legislature, the Department recommends that Commission use the current values as established in Docket 07-1199.
- E.3. The Department's recommendation that the Commission could require the use of the values for the regulatory cost of greenhouse gas emissions using the values established for Minn. Stat. § 216H.06 and last approved in Docket No. E999/CI-07-1199 in the Commission's December 2023 Regulatory Costs Order; will allow Xcel to incorporate these established values in its modeling inputs.

- Once the Agencies seeks feedback in Dockets 25-345 and 07-1199 based on the Commission's September 2025 Notice, and the Agencies provide their analysis and recommendations to the Commission; and once the Commission makes its determinations on the regulatory costs of greenhouse gas emissions during the course of the proceedings in Docket 07-1199; CenterPoint will have enough time to incorporate those values in its upcoming IRP due on July 1, 2027. Similarly, MERC will have enough time to incorporate those values in its upcoming IRP due on July 1, 2028.
- E.4.1. Xcel should also identify, explain, and discuss both its internal accounting and Federal Energy Regulatory Commission's (FERC) accounts and sub-accounts that will be used to track and record its internal costs and future regulatory costs associated with its upcoming natural gas IRP.
- The Department seeks validation and confirmation from Xcel in its Reply Comments in this proceeding that future regulatory costs are considered as future internal costs and treated just like any other variable cost and are therefore considered by the model when it selects units to dispatch.
- E.4.2. The Department recommends that CPE, Xcel, and MERC provide the following information in their respective Reply Comments, as follows:
 - Consistent with the information supplied by the LDC to EPA's GHGRP, provide information for 2024;
 - Provide a short narrative description of how the values listed in the table above, and inclusive of data for 2024, were tabulated and calculated;
 - Provide the natural gas deliveries (in Dekatherms) for the years 2010 through 2024 segregated by end-user (that is separately for residential customers, commercial customers, industrial customers, and electric generating facilities);
 - Provide the natural gas deliveries (in Dekatherms) for the years 2010 through 2024 further segregated between sales and transport categories by end-user (that is separately for residential customers, commercial customers, industrial customers, and electric generating facilities); and
 - To identify, explain, and discuss both the internal accounting and FERC accounts and sub-accounts that are used to track and record the internal costs used in reporting the data above.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce

Comments

Docket No. E999/CI-07-1199, G008, G002. G011/CI-23-117, and G999/CI-21-565

Dated this 3rd day of **November 2025**

/s/Sharon Ferguson

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28	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
29	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	21-565Official Service List
30	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
31	Noah	Cordoba	noah@buildingdecarb.org	Building Decarbonization Coalition		33594 Herring View Drive Lewes DE, 19958 United States	Electronic Service		No	21-565Official Service List
32	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	21-565Official Service List
33	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
34	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
35	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
36	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
37	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
38	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
39	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
40	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
41	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
42	Mark	Foster	mark@housingfirstmn.org	Housing First Minnesota		2960 Centre Pointe Drive Roseville MN, 55113 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
43	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	21-565Official Service List
44	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	21-565Official Service List
45	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
46	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
47	James	Gignac	jgignac@ucsusa.org	Union of Concerned Scientists		1 N LaSalle St Ste 1904 Chicago IL, 60602 United States	Electronic Service		No	21-565Official Service List
48	Debbie	Goettel	debbie.goettel@hennepin.us	Partnership on Waste and Energy		2785 White Bear Ave N Ste 350 Maplewood MN, 55109 United States	Electronic Service		No	21-565Official Service List
49	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	21-565Official Service List
50	Laura	Haight	lhaight@pfpi.net	Partnership for Policy Integrity		POB 2513 Amherst MA, 01004 United States	Electronic Service		No	21-565Official Service List
51	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
52	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	21-565Official Service List
53	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	21-565Official Service List
54	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
55	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	21-565Official Service List
56	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
57	Megan	Hoye	megan.hoye@minneapolismn.gov	City of Minneapolis		505 Fourth Ave S.	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, 55415 United States				Service List
58	Jon	Hunter	jon.hunter@lung.org	American Lung Association		490 Concordia Ave Saint Paul MN, 55103 United States	Electronic Service		No	21-565Official Service List
59	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-565Official Service List
60	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
61	Alan	Jenkins	aj@jenkinsattlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21-565Official Service List
62	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
63	Sarah	Johnson Phillips	sphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
64	Brendan	Jordan	bjordan@gpsid.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	21-565Official Service List
65	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	21-565Official Service List
66	D	Kalmon	dkalmon@mwwmo.org	Mississippi Watershed Management Organization		2522 Marshall St NE Minneapolis MN, 55418-3329 United States	Electronic Service		No	21-565Official Service List
67	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	21-565Official Service List
68	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
69	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	21-565Official Service List
70	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
71	Mark	Kresowik	mkresowik@aceee.org	American Council for an Energy-Efficient Economy		529 14th St NW, Suite 600 Washington DC, 20045 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
72	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
73	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
74	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
75	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
76	Robert	Lems	administration@dm-tcgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	21-565Official Service List
77	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	21-565Official Service List
78	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
79	Margaret	Levin	margaret.levin@sierraclub.org	Sierra Club North Star Chapter		2300 Myrtle Ave Ste 260 St. Paul MN, 55114 United States	Electronic Service		No	21-565Official Service List
80	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-565Official Service List
81	Sydney	Lieb	sydney.lieb@state.mn.us		Department of Commerce	85 7th Place East, Suite 280 St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
82	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
83	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21-565Official Service List
84	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
85	Emily	Marshall	emarshall@ourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
86	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	21-565Official Service List
87	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
88	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	21-565Official Service List
89	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	21-565Official Service List
90	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	21-565Official Service List
91	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-565Official Service List
92	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	21-565Official Service List
93	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
94	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-565Official Service List
95	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
96	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
97	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 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
98	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	21-565Official Service List
99	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
100	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
101	Will	Nissen	wnissen@mncee.org	Center for Energy and Environment			Electronic Service		No	21-565Official Service List
102	Curtis	Nordgaard	nordgaard@fresh-energy.org	Fresh Energy		408 Saint Peter Street Suite 350 St Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
103	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-565Official Service List
104	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
105	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	21-565Official Service List
106	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
107	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
108	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	21-565Official Service List
109	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	21-565Official Service List
110	Bret	Pence	bretpence@mnipl.org	Minnesota Interfaith Power and Light		106 Waverly Place Duluth MN, 55803 United States	Electronic Service		No	21-565Official Service List
111	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
112	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List
113	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	21-565Official Service List
114	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	21-565Official Service List
115	Lauren	Reeg	lreeg@rmi.org	RMI		806 N Pinyon Ct. Hartland WI, 53029 United States	Electronic Service		No	21-565Official Service List
116	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	21-565Official Service List
117	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	21-565Official Service List
118	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	21-565Official Service List
119	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	21-565Official Service List
120	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	21-565Official Service List
121	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
122	Kathleen	Schuler	kathleen@hpforhc.org	Health Professionals for a Healthy Climate		Health Professionals for a Healthy Climate PO Box 583013 Minneapolis MN, 55458-3013 United States	Electronic Service		No	21-565Official Service List
123	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	21-565Official Service List
124	Patrick	Serfass	pserfass@ttcorp.com	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
125	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
126	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	21-565Official Service List
127	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
128	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	21-565Official Service List
129	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	21-565Official Service List
130	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	21-565Official Service List
131	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
132	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	21-565Official Service List
133	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	21-565Official Service List
134	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
135	Mark	Spurr	mospurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
136	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
137	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
138	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
139	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
140	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-565Official Service List
141	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	21-565Official Service List
142	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	21-565Official Service List
143	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	21-565Official Service List
144	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L Street #513 Sacramento CA, 95814 United States	Electronic Service		No	21-565Official Service List
145	Jenna	Warmuth	jenna@rewiringamerica.org	Rewiring America		3218 Georgia Ave NW, Suite 1 Washington DC, 20011 United States	Electronic Service		No	21-565Official Service List
146	Nicole	Westling	nicole.westling@state.mn.us		Department of Commerce	85 7th Place E Suite 280 St Paul MN, 55001 United States	Electronic Service		No	21-565Official Service List
147	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	21-565Official Service List
148	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	21-565Official Service List
149	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
150	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	21-565Official Service List
151	Mariko	Yatsunami	myatsunami@mncee.org	Center for Energy and Environment		212 N 3rd Ave Suite 560 Minneapolis MN, 55404 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
152	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
153	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
154	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
155	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

#	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	23-117Official List
2	Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource		15669 WATERLOO CIR TRUCKEE CA, 96161 United States	Electronic Service		No	23-117Official List
3	Jose	Alvillar	jose@unidos-mn.org	Unidos-MN		null null, null United States	Electronic Service		No	23-117Official List
4	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	23-117Official List
5	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-117Official List
6	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	23-117Official List
7	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
8	James H.	Barkley	james.barkley@bakerbotts.com	Baker Botts		910 Louisiana Street Houston TX, 77002-4995 United States	Electronic Service		No	23-117Official List
9	Marisa	Bayer	mbayer@edinamn.gov	City of Edina		4801 W 50th St Edina MN, 55424 United States	Electronic Service		No	23-117Official List
10	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	23-117Official List
11	Randall	Beck	rbeck3@wm.com	Waste Management Renewable Energy, L.L.C.		1021 Main St Houston TX, 77002 United States	Electronic Service		No	23-117Official List
12	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	23-117Official List
13	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	23-117Official List
14	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
15	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	23-117Official List
16	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
17	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		Yes	23-117Official List
18	Jocelyn	Bremer	jocelyn.bremer@minneapolismn.gov	City of Minneapolis		350 S Fifth St Ste 210 Minneapolis MN, 55415 United States	Electronic Service		No	23-117Official List
19	Tim	Brinkman	tim.brinkman@gvtel.com	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	23-117Official List
20	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-117Official List
21	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	23-117Official List
22	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	23-117Official List
23	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	23-117Official List
24	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	23-117Official List
25	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
26	Barbara	Case	barbara.case@state.mn.us		Office of Administrative Hearings	600 N. Robert St. St. Paul MN, 55101 United States	Electronic Service		No	23-117Official List
27	Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org			Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul MN, 55102 United States	Electronic Service		No	23-117Official List
28	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-117Official List
29	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
30	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	23-117Official List
31	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	23-117Official List
32	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	23-117Official List
33	Jean	Comstock	jean.comstock.dbcc@gmail.com		St. Paul 350	729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	23-117Official List
34	Noah	Cordoba	noah@buildingdecarb.org	Building Decarbonization Coalition		33594 Herring View Drive Lewes DE, 19958 United States	Electronic Service		No	23-117Official List
35	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-117Official List
36	Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 St. Paul MN, 55104 United States	Electronic Service		No	23-117Official List
37	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
38	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
39	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	23-117Official List
40	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	23-117Official List
41	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	23-117Official List
42	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
43	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	23-117Official List
44	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	23-117Official List
45	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	23-117Official List
46	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	23-117Official List
47	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	23-117Official List
48	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	23-117Official List
49	Debbie	Goettel	debbie.goettel@hennepin.us	Partnership on Waste and Energy		2785 White Bear Ave N Ste 350 Maplewood MN, 55109 United States	Electronic Service		No	23-117Official List
50	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	23-117Official List
51	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
52	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-117Official List
53	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	23-117Official List
54	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-117Official List
55	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	23-117Official List
56	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55402 United States				
57	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	23- 117Official List
58	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	23- 117Official List
59	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	23- 117Official List
60	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	23- 117Official List
61	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	23- 117Official List
62	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23- 117Official List
63	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 117Official List
64	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 117Official List
65	Brendan	Jordan	bjordan@gpsid.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	23- 117Official List
66	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	23- 117Official List
67	D	Kalmon	dkalmon@mwmw.org	Mississippi Watershed Management Organization		2522 Marshall St NE Minneapolis MN, 55418- 3329 United States	Electronic Service		No	23- 117Official List
68	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23- 117Official List
69	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23- 117Official List
70	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution	520 Lafayette Rd N. St. Paul MN,	Electronic Service		No	23- 117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Control Agency	55155 United States				
71	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
72	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-117Official List
73	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	23-117Official List
74	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
75	Andrew	Larson	andrew.m.larson@state.mn.us		Public Utilities Commission	121 7th Place E., #350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23-117Official List
76	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-117Official List
77	Robert	Lems	administration@dmr-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	23-117Official List
78	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-117Official List
79	Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-117Official List
80	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-117Official List
81	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
82	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-117Official List
83	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
84	Emily	Marshall	emarshall@ourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
85	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	23-117Official List
86	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
87	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	23-117Official List
88	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-117Official List
89	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	23-117Official List
90	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	23-117Official List
91	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-117Official List
92	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-117Official List
93	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
94	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	23-117Official List
95	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-117Official List
96	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
97	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
98	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	23-117Official List
99	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
100	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-117Official List
101	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-117Official List
102	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-117Official List
103	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	23-117Official List
104	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	23-117Official List
105	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	23-117Official List
106	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		Yes	23-117Official List
107	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-117Official List
108	Kevin	Pranis	kpranis@llunagro.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-117Official List
109	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	23-117Official List
110	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	23-117Official List
111	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55901 United States				
112	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	23-117Official List
113	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	23-117Official List
114	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
115	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	23-117Official List
116	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-117Official List
117	Patrick	Serfass	pserfass@ttcorp.com	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	23-117Official List
118	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	23-117Official List
119	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	23-117Official List
120	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	23-117Official List
121	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-117Official List
122	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-117Official List
123	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-117Official List
124	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
125	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-117Official List
126	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
127	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
128	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	23-117Official List
129	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
130	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	23-117Official List
131	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
132	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	23-117Official List
133	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
134	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	23-117Official List
135	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-117Official List
136	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L Street #513 Sacramento CA, 95814 United States	Electronic Service		No	23-117Official List
137	Nicole	Westling	nicole.westling@state.mn.us		Department of Commerce	85 7th Place E Suite 280 St Paul MN, 55001 United States	Electronic Service		No	23-117Official List
138	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	23-117Official List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
139	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	23-117Official List
140	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List
141	James	Worlobah	james.worlobah@state.mn.us		Public Utilities Commission	121 7th Place E, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	23-117Official List
142	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-117Official List
143	Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts		700 K St NW Washington DC, 20001 United States	Electronic Service		No	23-117Official List
144	Grant	Zimmerman	gzimmerman@ampamericas.com	Amp Americas		811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States	Electronic Service		No	23-117Official List
145	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-117Official List
146	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	23-117Official List
147	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-117Official List