BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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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 ISSUE DATE: March 27, 2024

DOCKET NO. G-008,G-002,G-011/CI-23-117

DOCKET NO. G-999/CI-21-565

ORDER ESTABLISHING FRAMEWORK FOR NATURAL GAS UTILITY INTEGRATED RESOURCE PLANNING

PROCEDURAL HISTORY

On February 17, 2023, the Commission issued an order that, among other actions, delegated authority to its Executive Secretary to begin a proceeding to establish the content and procedural requirements for natural gas integrated resource plans for CenterPoint Energy Resources Corporation d/b/a CenterPoint Energy Minnesota Gas (CenterPoint); Northern States Power Company d/b/a Xcel Energy (Xcel); and Minnesota Energy Resources Corporation (MERC).¹

On April 11, 2023, the Commission issued a notice outlining the expected process for developing a framework for natural gas integrated resource planning in Minnesota.

Between May and December 2023, the Great Plains Institute facilitated eight meetings of the Minnesota Gas Utility Innovation Roundtable to discuss natural gas integrated resource planning in Minnesota.

On September 20, 2023, the Commission issued a notice requesting comments on the scope of content for natural gas integrated resource plans.

On October 11, 2023, the Commission issued an amended notice requesting comments on the proposal that the Citizens Utility Board of Minnesota (CUB) would submit on October 24, 2023.

¹ In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers, Docket No. G-999/CI-21-135, 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, at 21 (February 17, 2023) (Resource Plan Initiating Order).

On October 24, 2023, CUB submitted its proposal for a natural gas integrated resource planning framework for Minnesota.

On November 14, 2023, the Commission issued a notice that Commission staff would host a virtual public meeting on November 28, 2023, to answer questions regarding participation in the natural gas integrated resource planning docket.

By December 1, 2023, the following groups submitted comments:

- Midwest Energy Efficiency Alliance
- City of Minneapolis
- International Union of Operating Engineers Local 49 (IUOE 49)
- Department of Commerce, Division of Energy Resources (the Department)
- MERC
- CenterPoint
- Office of the Attorney General, Residential Utilities Division (OAG)
- Xcel
- Fresh Energy, Minnesota Center for Environmental Advocacy, and Sierra Club (collectively, Clean Energy Organizations or CEOs)
- Center for Energy and the Environment (CEE)
- Laborers' International Union of North America—Minnesota and North Dakota (LIUNA)

By January 2, 2024, the following groups submitted reply comments:

- CEE
- Department
- Minnesota Building and Construction Trades Council
- CenterPoint
- Great Plains Institute
- OAG
- International Brotherhood of Electrical Workers
- Xcel
- MERC
- CUB
- IOUE 49
- North Star Policy Action
- CEOs
- LIUNA

On February 20, 2024, CEE, the Department, LIUNA, and Xcel (collectively, Joint Commenters) submitted an alternative proposal to resolve the issues before the Commission.

On February 22, 2024, the Commission met to consider the matter.

FINDINGS AND CONCLUSIONS

I. Summary of Commission Action

In this order, the Commission will establish the framework for natural gas integrated resource planning, as applied to CenterPoint, MERC, and Xcel. This framework includes integrated resource planning objectives, scope, guidelines, procedural requirements, and resource plan components. This order represents one step in an ongoing process to implement integrated resource planning for natural gas utilities in Minnesota.

The Commission will largely adopt the approach proposed by the Joint Commenters, which builds off CUB's initial proposal. The Commission is grateful to all the stakeholders for working together to develop integrated resource planning for CenterPoint, MERC, and Xcel. The Commission also appreciates the efforts of the Great Plains Institute and Commission staff for facilitating and guiding the process.

II. Background

In February 2021, cold weather across much of the United States caused increased demand for natural gas and, in some areas, supply disruptions. This situation led to an extreme rise in natural gas prices. Minnesota's rate-regulated gas utilities maintained continuous service to customers throughout this period, but some utilities incurred unprecedented costs when purchasing gas on the spot market. These extreme circumstances prompted the Commission to investigate whether costs were prudently incurred and what measures could mitigate future price volatility.

One result of that investigation was the Commission's finding that "natural gas resource planning is in the public interest because it will provide a better understanding of the relative value of possible resource portfolios under a range of future scenarios, which could help gas utilities identify which comprehensive strategies are likely to be most efficient and effective for adapting to the increasing frequency of extreme weather events and, further, to ongoing transitions in the natural gas and energy industries." The Commission initiated the instant proceeding to establish content and procedural requirements for gas resource plans for the state's three largest gas utilities—CenterPoint, Xcel, and MERC.

Recent legislative actions have also encouraged changes to the natural gas sector:

- In 2023, the legislature expanded the state's greenhouse gas emissions reduction goal to reach net-zero emissions across all sectors by 2050, compared to 2005 levels.³
- In 2021, the legislature passed the Natural Gas Innovation Act (NGIA), which establishes a framework to allow natural gas utilities to meet Minnesota's greenhouse gas reduction and renewable energy goals through innovative resources. Utilities can submit for Commission approval Natural Gas Innovation Plans to propose pilot programs to develop innovative resources, including biogas, renewable natural gas, power-to-hydrogen,

³ 2023 Minn. Laws ch. 60, art. 12, § 61; Minn. Stat. § 216H.02, subd. 1.

² Resource Plan Initiating Order at 21.

⁴ 2021 Minn. Laws 1st Spec. Sess. ch. 4, art 8, § 20; Minn. Stat. § 216B.2427.

power-to-ammonia, carbon capture, strategic electrification, district energy, and energy efficiency.⁵

Also in 2021, the legislature passed the Energy Conservation and Optimization (ECO)
 Act, which updates and grows the Conservation Improvement Program through more
 ambitious conservation goals for utilities, expanded eligibility for low-income customers,
 fuel switching, and other measures.⁶

III. Commission Authority

Under Minnesota law, the Commission has broad authority to "ascertain and fix just and reasonable standards, classifications, rules, or practices to be observed and followed by any or all public utilities with respect to the service to be furnished." Integrated resource planning falls within the standards and practices followed by natural gas utilities.

The Commission has concluded that natural gas integrated resource planning is needed to address the increasing frequency of extreme weather events due to climate change and other supply disruptions, as well as ongoing transition in the industry, spurred in part by legislative action. Integrated resource planning will help guide the state's largest natural gas utilities through this period of rapid change to allow for the continued safe and reliable delivery of natural gas to customers at reasonable rates.

IV. Disputed Issues

In this order, the Commission will establish the main components of integrated resource planning, many of which have broad agreement among the commenters. The two main areas of disagreement among commenters were the forecast period for resource plans and distribution system analysis, which the Commission discusses below. On all other issues, the Commission concurs with and will adopt the recommendations of the Joint Commenters, as set forth in the ordering paragraphs below.

A. Forecast Period

1. Comments

In its proposal, CUB recommended a forecast period through 2050 to align gas resource plans with the state's net-zero greenhouse gas emissions goal. CEOs supported CUB's recommended planning horizon as critical to accomplishing the objectives of long-term gas system planning and achieving the 2050 net-zero greenhouse gas goal. CUB cited gas utilities in other states that use a planning timeline extending to 2050, and CEOs argued that Minnesota gas utilities are already considering the net-zero goal in their internal planning.

CUB acknowledged that gas utilities cannot predict with perfect clarity how natural gas service, use, and demand will evolve over the next 25 years, and the increasing uncertainty in the outer

⁵ Minn. Stat. § 216B.2427, subd. 2.

⁶ 2021 Minn. Laws ch. 29.

⁷ Minn. Stat. § 216B.09, subd. 1.

years of this planning horizon will produce greatly diverging 2050 predictions among utilities and stakeholders. CUB maintained that the purpose of a long-term system plan is not to project the future with certainty but rather to provide information about a range of possible futures to inform utility decision-making and help the utility manage risk. CEOs maintained that using a 2050 forecast period would give the Commission insight into whether the utility is realistically considering options to decarbonize gas end uses while centering equity and minimizing risk.

The utilities, the Department, and the labor unions opposed a 2050 planning horizon. The Department argued that the planning horizon for gas utility resource planning should be consistent with electric utility resource planning and use a forecast period of 10–15 years. The Department recommended developing a scenario for achieving net-zero greenhouse gas emissions by 2050 in the "Future of Gas" docket, G-999/CI-21-565.

The utilities and labor unions argued against a 2050 planning horizon, noting that the legislature had set a statewide goal of achieving net-zero greenhouse gas emissions by 2050, not a mandate specific to natural gas utilities. These commenters argued that it is impossible to accurately predict outcomes so far into the future, and therefore any conclusions to be drawn from such a forecast would be unreliable and of little value. Xcel and CenterPoint discussed their internal goals to achieve net-zero greenhouse gas emissions within this timeframe. While Xcel opposed a 2050 planning horizon, the utility suggested that the scope of natural gas integrated resource planning should consider the state's economy-wide greenhouse gas reduction targets.

2. Commission Action

Resource planning is an inherently forward-looking exercise, and it is important to strike the right balance between prediction and accuracy when choosing a forecast period. As a forecast reaches further into the future, the number of variables and possible outcomes increase, which decreases the reliability of the forecast. The Commission agrees with most of the parties that a forecasting period extending to 2050 reaches too far into the future and is unlikely to produce useful, actionable insights. The Commission will instead adopt the Joint Commenters' proposal to require gas resource plans to include a ten-year sales and emissions forecast and a five-year action plan of the specific steps that the utility will take to implement that plan over the next five years.

The Commission acknowledges that CUB chose the year 2050 for its forecast period because of Minnesota's economy-wide goal of net-zero greenhouse gas emissions by 2050. By enshrining this goal in statute, the legislature signaled that all Minnesota industries should find ways to reduce emissions and achieve this goal. Though the Commission will limit the forecast period to 10 years, the Commission believes this goal is highly relevant to gas resource planning and should inform the utilities' shorter-term goals. The Commission will therefore include the state's economy-wide greenhouse gas reduction statutory goals within the scope of integrated resource planning.

B. Distribution System Analysis

1. Comments

CUB recommended including a two-part distribution system analysis in gas integrated resource planning, consisting of a capital investment plan and a non-pipeline alternatives analysis. CUB described a capital investment plan as a forecast of the utility's spending by project

classification, while the non-pipeline alternatives analysis would examine whether non-pipeline alternatives could be less expensive or more beneficial than traditional utility investments like pipeline replacements.

CUB, OAG, CEOs, Minneapolis, and the Midwest Energy Efficiency Alliance emphasized the importance of this analysis to properly plan infrastructure investments based on forecasted demand. They cautioned that overbuilt infrastructure combined with energy conservation and electrification could lead to stranded infrastructure costs borne by a decreasing customer base. They argued that projects related to safety, reliability, and maintenance comprise most distribution investments and should be included in integrated resource planning, and they maintained that inclusion of these categories would not undermine safety or reliability.

CenterPoint, MERC, and IUOE 49 urged that natural gas integrated resource planning focus on supply and procurement rather than distribution investments and cautioned that integrated resource planning cannot conflict with federal pipeline safety or integrity management projects. These commenters objected to the proposed non-pipeline alternatives analysis, but CenterPoint suggested that an alternatives analysis could be used to scale up NGIA pilots.

Joint Commenters ultimately proposed a more limited approach to distribution planning that focuses on analyzing alternatives to projects related to capacity and resource expansions. The Joint Commenters' approach would expressly exclude distribution system investments related to routine maintenance, public works accommodation, integrity, reliability, and safety.

2. Commission Action

The Commission agrees with the Joint Commenters that a narrower analysis of capacity and resource expansion projects is appropriate for gas integrated resource planning. This will allow utilities, stakeholders, and the Commission to analyze and discuss how best to meet upcoming capacity needs without disrupting safety or reliability. The Commission will exclude distribution system investments related to routine maintenance, public works accommodation, integrity, reliability, and safety from the integrated resource planning process and analysis.

ORDER

Objectives and Scope of Integrated Resource Planning

- 1. Natural gas resource planning shall be referred to as "integrated resource planning."
- 2. The Commission finds that the objective of integrated resource planning for natural gas utilities is to determine, based on the best information currently available, the mix of energy resources that best protects ratepayer and public interests; maintains safe, reliable, and affordable service; and advances state policy moving forward.
- 3. Integrated resource planning for natural gas utilities includes analysis and evaluation of the appropriate resource mix, including supply-side and demand-side resources to serve customer end-use energy needs, and consideration of new infrastructure investments above a defined threshold necessary to meet existing or forecasted gas demand needs. Infrastructure investments for routine maintenance, safety, public works accommodation,

integrity, and reliability are not part of the integrated resource planning process or analysis, and existing proceedings covering procurement and cost recovery of natural gas supply, transportation, and storage should continue independently from this proceeding.

- 4. The scope of integrated resource planning considers the State's economy-wide greenhouse gas reduction statutory goals.
- 5. The term "integrated resource planning" means, in the case of a gas utility, planning by the use of any standard, regulation, practice, or policy to undertake a systematic comparison between energy resource options to minimize the lifecycle costs of adequate and reliable utility services to consumers. Integrated resource planning shall take into account the necessary features for a system operation such as diversity, reliability, dispatchability, and other factors of risk and shall treat demand and supply to consumers on a consistent and integrated basis.

Resource Plan Guidelines

- 6. All resources must be evaluated on a consistent and comparable basis.
- 7. All known resources for meeting the utility's load should be considered, including supply-side and demand-side and infrastructure options.
- 8. Utilities should compare different resource fuel types, technologies, lead times, inservice dates, durations, and locations in scenario analysis.
- 9. Consistent assumptions and methods should be used for evaluation of all resources.
- 10. Resources should be evaluated based on the current U.S. dollar, with appropriate resource-specific discount rates.
- 11. Energy efficiency must be treated as an energy resource alongside all other energy resources. Energy efficiency should be included in utility resource analysis and allowed to compete with supply-side and infrastructure resources to determine the optimal level of energy efficiency over the planning period.
- 12. The analysis should provide utility-specific clarity about the appropriate and cost-effective level of future energy efficiency procurement.
- 13. Approved levels of energy efficiency should be coordinated with and integrated into natural gas utility future Energy Conservation and Optimization plans and programs, as well as Natural Gas Innovation Act plans and programs.
- 14. Resource plans should evaluate demand response resources, including voluntary rate programs, on par with other options for meeting energy and capacity needs.
- 15. Utilities should address risk and uncertainty of demand, availability, and price for all resource options included in resource plans, and costs to comply with any regulation of greenhouse gas emissions.

- 16. Utilities should identify in their resource plans any additional sources of risk and uncertainty.
- 17. Utilities should estimate the environmental externality costs of resource options.
- 18. Utilities should analyze, on an integrated basis, all resource options, including the supply-side, demand-side, and infrastructure resources, to reliably meet customer requirements.
- 19. Resource plans should demonstrate that the utility's chosen portfolio achieves its stated reliability objectives.
- 20. Resource plans will be evaluated based on the characteristics of the available resource options and of the proposed plan as a whole. Resource options and resource plans will be evaluated on their ability to:
 - a. Maintain or improve the safety, adequacy, and reliability of utility service.
 - b. Keep the customers' bills and the utility's rates as low as practicable, given regulatory and other constraints.
 - c. Minimize adverse socioeconomic effects and adverse effects upon the environment.
 - d. Enhance the utility's ability to respond to changes in the financial, social, and technological factors affecting its operations.
 - e. Limit the risk of adverse effects on the utility and its customers from financial, social, and technological factors that the utility cannot control.
 - f. Include cost-effective energy savings as the preferred energy resource.

Procedural Requirements

- 21. Utilities shall file natural gas resource plans consistent with a staggered filing schedule and require a new resource plan filed once every three years from the date of the Commission's final order approving the previous resource plan, or (if applicable) the date the Commission issued an order following a petition requesting reconsideration or amendment of an order approving a resource plan.
- 22. Each natural gas utility must do the following:
 - a. Make its resource plan publicly available on its website.
 - b. Provide individual written notice of the resource plan to all its Minnesota customers through a bill insert.
 - c. Provide written notice to the governing bodies of all municipalities, counties, local governing bodies, and Tribal nations within its Minnesota service territory.

- d. Develop an advertising plan for its Minnesota service territory.
- e. Minimize confidential data in resource plans as much as possible.
- f. Provide all relevant analysis files to the Department of Commerce upon initial filing and to all other parties that request them in writing and execute a reasonable non-disclosure agreement.
- g. Participants shall comply with reasonable requests for information by the Commission, other parties, and other interested persons. The person making the information request must provide a copy of the information request to the Commission and to known parties. Participants shall reply to information requests within ten days of receipt, unless this would place an extreme hardship upon the replying party. A copy of the information provided to a participant or other interested person must be filed with the Commission. The replying participant must also provide a copy of the information to any other participant or interested person upon request. Disputes regarding information requests may be taken to the Commission or, if a contested case proceeding has been ordered, to the assigned administrative law judge.
- 23. Interested stakeholders are not required to formally request the Commission's authorization to intervene in a natural gas integrated resource planning proceeding unless it is referred to the Office of Administrative Hearings for a contested case proceeding.
- 24. Integrated resource planning proceedings will be conducted before the Commission in an uncontested proceeding whenever practicable, with the Commission issuing one or more notices of comment period to solicit comments from interested stakeholders and the public.
- 25. The Commission will ensure public meetings provide opportunities for Minnesota residents to verbally comment on the utilities' natural gas resource plans considering accessibility for individuals from or representing communities that are typically underrepresented in utility decision-making.
- 26. The Commission will approve, modify, and/or reject natural gas utility resource plans.
- 27. Resource plans must A) be updated on a regular basis, B) provide the opportunity for public participation and comment, C) provide for methods of validating predicted performance, and D) contain a requirement that the plan be implemented after approval of the state regulatory authority.
- 28. Resources approved through the integrated resource planning process, within the defined, near-term action period, should be considered conditionally approved for acquisition or procurement. "Conditional approval" means that the type of resource, size of the resource, and timing of acquisition or procurement of that resource is approved. Conditional approval does not constitute a finding of prudency in the procurement or acquisition of resources approved through the integrated resource planning process.

- 29. Existing natural gas supply, transportation, and storage procurement and cost recovery proceedings should continue to function independently from this proceeding.
- 30. Each utility shall submit an update on its most recently approved resource plan on an annual basis. The update is due on the anniversary of the order approving the utility's last approved resource plan. If a utility anticipates a significant deviation from its approved resource plan, it must file an update with the Commission (unless the utility is within six months of its next resource plan filing).
- 31. Unless the utility requests changes to approved actions, the annual update is an informational filing that describes actions taken to implement the approved resource plan, provides an assessment of what has changed since the approval of the plan, and justifies any deviations from the approved action plan.
- 32. "Typical discovery procedures" are those currently used for electric resource plans as laid out in Minnesota Rule 7843.0300, subpart 8.
- 33. Parties and other interested persons may express support for the proposed resource plan filed by a utility. Alternatively, parties and other interested persons may file proposed resource plans different from the plan proposed by the utility. When a plan differs from that submitted by the utility, the plan must be accompanied by a narrative and quantitative discussion of why the proposed changes would be in the public interest, considering the evaluation criteria of gas plans.
- 34. The utility shall file with its resource plan supporting information, including descriptions of the overall process and of the analytical techniques used by the utility to create its proposed resource plan from the available options.
- 35. For the utility's preferred resource plan, the supporting information must include a narrative and quantitative discussion of why the plan would be in the public interest.
- 36. A utility shall include in its resource plan filing a nontechnical summary, not exceeding 25 pages in length and describing the utility's resource needs, the resource plan created by the utility to meet those needs, the process and analytical techniques used to create the plan, activities required over the next five years to implement the plan, and the likely effect of plan implementation on electric rates and bills.

Resource Plan Components

- 37. In their resource plans, utilities shall include a Planning Environment section discussing risks and uncertainties of the planning context, including an assessment of the impacts of economic, demographic, and environmental conditions; environmental and other relevant policies; new technologies; and other important factors.
- 38. The utility shall include a narrative review of its past plan in the Planning Environment section of the utility's new plan.
- 39. Utilities shall provide utility load and customer forecasts in their resource plans.

- 40. Utilities shall provide a high, medium, and low load forecast, along with relevant assumptions, in their resource plans.
- 41. The utilities shall include in their resource plans information and assumptions used to develop the utility's design day criteria.
- 42. Each utility shall provide a full list of resources considered in the utility's resource plan, with relevant information related to characteristics, applicability, costs, and environmental impacts, as well as lead-time, expected in-service dates, and expected lifetime.
- 43. Natural gas supply resources can be provided for informational purposes, but existing procurement and regulatory cost recovery processes the Commission already has in place should remain separate from integrated resource planning proceedings.
- 44. Utilities shall examine all commercially available demand- and supply-side resources and determine a set of available resources.
- 45. Utilities shall analyze high, medium, and low load scenarios in their resource plans.
- 46. Utilities shall analyze high, medium, and low natural gas price sensitivities in their resource plans.
- 47. Natural gas integrated resource planning shall include an analysis that tests portfolios during the event of a significant supply-side disruption, such as an explosion that interrupts interstate pipeline operation.
- 48. Utilities shall include additional analyses of scenarios and sensitivities in their resource plans as directed by the Commission.
- 49. Natural gas resource plans shall include the cost of each scenario and sensitivity presenting both the utility's revenue requirement and environmental costs and other externalities to the utility's revenue requirement.
- 50. A natural gas utility's preferred plan should include both (1) a ten-year sales and emissions forecast, and (2) a five-year action plan of the specific steps that it will take to implement that plan over the next five years.

Distribution System Analysis

- 51. Utilities shall incorporate infrastructure costs related to resource expansion or new resources above an investment threshold to be established at a later date into the resource analysis and selection process.
- 52. The alternatives analysis shall be called "Expansion Alternatives Analysis."
- 53. Utilities shall incorporate targeted distribution system analysis into the integrated resource planning process to proactively identify areas of the natural gas system with upcoming capacity needs and analyze how to best serve those needs.

- 54. For initial utility resource plans, utilities shall identify two to three significant upcoming capacity expansion projects in each utility resource plan for a full alternatives evaluation.
- 55. Distribution system investments related to routine maintenance, public works accommodation, integrity, reliability, and safety are not part of the integrated resource planning process or analysis.

Stakeholder Process for Affordable and Equitable Service

- 56. The Commission delegates authority to the Executive Secretary to begin a stakeholder process, followed by a notice of comment period in Docket No. G-999/CI-21-565, to consider changes to rates needed to maintain affordable and equitable utility service. This stakeholder process shall consider the following:
 - a. Stakeholder recommendations as developed in G21 process.
 - b. The potential for stranded costs on the natural gas system due to electrification.
 - c. The policy implications of electrification, including whether technological advances will allow complete electrification, given intermittency of renewables.
- 57. This order shall become effective immediately.

BY ORDER OF THE COMMISSION

Colliner C. Bither for

Will Seuffert

Executive Secretary



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CERTIFICATE OF SERVICE

I, Mai Choua Xiong, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission ORDER ESTABLISHING FRAMEWORK FOR NATURAL GAS UTILITY INTEGRATED RESOURCE PLANNING

Docket Number **G-008,G-002,G-011/CI-23-117 G-999/CI-21-565** Dated this 27th day of March, 2024

/s/ Mai Choua Xiong

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-565_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400	Electronic Service	Yes	OFF_SL_23-117_Official List
				St. Paul, MN 55101			
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Katherine	Hinderlie	katherine.hinderlie@ag.stat e.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-117_Official List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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