



505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN 55459-0038

– VIA ELECTRONIC FILING –

April 19, 2021

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Re: **In the Matter of the Application of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, in Compliance with the Minnesota Public Utilities Commission’s Order in CenterPoint Energy’s General Rate Filing Docket No. G-008/GR-19-524 – 2019 Rate Case**

REPLY COMMENTS

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or the “Company”), respectfully submits its Reply Comments in response to the April 12, 2021, Comments filed by the Minnesota Department of Commerce, Division of Energy Resources (“Department”) regarding the March 12, 2021 compliance filing submitted by CenterPoint Energy in the following matter:

Application of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Authority to Increase Rates for Natural Gas Utility Service in Minnesota.

The Company thanks the Department for its thorough review and is providing additional information as requested in its Comments submitted on April 12, 2021.

If there are any questions, please contact me at the email address below or at 612-321-4480.

Sincerely,

/s/

Andrew Sudbury
Manager, Regulatory Portfolio Management
Andrew.Sudbury@centerpointenergy.com

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

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

In the Matter of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, in Compliance with the Minnesota Public Utilities Commission’s Order in CenterPoint Energy’s 2019 General Rate Filing

Docket No. G-008/GR-19-524
REPLY COMMENTS

INTRODUCTION

CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) respectfully submits the following Reply Comments to the Minnesota Public Utilities Commission (“Commission”) in response to issues raised by the Minnesota Department of Commerce (“Department”) in their April 12, 2021, Comments (“Department Comments”). The Company appreciates the Department’s review and Comments in this matter.

CenterPoint Energy agrees with the Department’s analysis and conclusions that the Company complied with Ordering Paragraphs 3(A) and 3(B) of the 2019 Rate Case Order concerning Storage Inventory and its Extension Tariff¹. The Company further agrees with the Department’s recommendations² that the Commission should:

- (1) approve CenterPoint’s proposed Conservation Cost Recovery Charge of \$0.2372 per dekatherm (or \$0.2372 per therm);
- (2) require CenterPoint to resubmit the CIP tracker account (including rates, revenues, expenses, and ending balance) based on actual data for the entire period that interim rates were in effect, within 10 days after the actual date final rates become effective;
- (3) approve CenterPoint’s proposed tariffs, with the exception of Twentieth Revised Page 13 of Section V; and

¹ Department Comments, p. 2.

² Department Comments, p. 6.

- (4) require CenterPoint to reflect its proposed Conservation Cost Recovery Charge of \$0.2372 per dekatherm (or \$0.02372 per therm) on Twentieth Revised Page 13 of Section V.

While concluding that CenterPoint Energy's Compliance Filing and proposed rates and tariff pages (with one exception) reflected the terms of the Settlement, the Department discussed issues and requested the Company provide further information. To fully address the Department Comments, these Reply Comments discuss:

- Revised Base Cost of Gas;
- CIP Tracker;
- Revised Tariff Sheets;
- Refund Factor Calculating Interim Rate Refunds.

1. Revised Base Cost of Gas

CenterPoint Energy acknowledges the Department's separate Comments filed on April 12, 2021 regarding the revised base cost of gas, supporting schedules, and tariffs in Docket No. G008/MR-21-182. The Company will similarly submit Reply Comments in that respective docket.

2. CIP Tracker

The Company appreciates the Department's review of its projected CIP tracker through May 2021 and agrees with the Department's recommendation. Thus, the Company will resubmit CIP tracker account information (including rates, revenues, expenses, and ending balance) based on actual data for the entire period that interim rates were in effect. This information will be filed within 10 days after the actual date final rates become effective.

3. Revised Tariff Sheets

Regarding its revised tariff sheets, CenterPoint Energy agrees with the Department's assessment that the Conservation Cost Recovery Charge ("CCRC") on Twentieth Revised Page 13 of Section V should have been updated to reflect the CCRC of \$0.2372 per Dth included in Schedule C-1 of the Company's Compliance Filing. This was an inadvertent oversight and the Company agrees to update its tariffs to reflect the approved CCRC of \$0.02372 per therm. As part of these Reply Comments, the Company respectfully submits Attachment 1 with the updated tariff sheet seeking to replace Twentieth Revised Page 13 of Section V of its tariff book included in its March 12, 2021, Compliance Filing.

4. Refund Factor Calculating Interim Rate Refunds

The Department provided discussion³ on the Company's proposed refund factor detailed in Schedules E and E-1 through E-6 of the Compliance Filing. Based on these Schedules, the Department requested the Company "...clarify in reply comments how the refund factor it proposes to use to calculate interim rate refunds complies with Ordering Paragraph No. 4(E), or provide corrected versions of Schedule E and any related supporting schedules with all changes

³ Department Comments, Page Nos. 4 through 6.



CONSERVATION IMPROVEMENT PROGRAM ADJUSTMENT RIDER

Applicability:

Applicable to bills for gas and/or transportation service provided under the Company's retail rate schedules.

Exemptions are as follows:

"Large Energy Facility", as defined in Minn. Stat. 216B.2421 customers shall receive a monthly exemption from conservation improvement program (CIP) charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Upon exemption from conservation program charges, the "Large Energy Facility" customers can no longer participate in any utility's Energy Conservation Improvement Program.

"Large Customer Facility" customers that have been exempted from the Company's CIP charges pursuant to Minn. Stat. 216B.241, subd. 1a (b) shall receive a monthly exemption from CIP charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from the conservation program charges, the "Large Customer Facility" customers can no longer participate in CenterPoint Energy's Energy Conservation Improvement Program.

Minnesota Stat. 216B.241, subd. 1a(c) which allows exemption of certain commercial gas customers does not apply to CenterPoint Energy because the Company's customer count exceeds the 600,000 level set in statute.

Rate:

Base Charge Per Therm (CCRC)	Adjustment (CCRA)
\$0.0237282	\$0.00591

~~Interim Surcharge~~

~~Effective January 1, 2020, customers' bills will be increased on an interim basis by 13.7% on the monthly basic charge, the GAP charge, and the delivery charge per therm. Any sales tax and franchise fees will be calculated on the increased bill. If the total amount of the rate increase approved at the end of the rate case (Docket G-008/GR-19-524) is lower than the total amount of the interim rates collected, the Company will refund the difference with interest, and if the total amount of the final rates are higher than the total amount of interim rates, the Company will not charge the customer for the difference.~~

Rider:

A Conservation Improvement Program Adjustment which shall be included on each non-exempt customer's monthly bill. The applicable factor shall be multiplied by the customer's monthly billing in Therms for gas service before any adjustments, surcharges or sales tax.

Determination of Conservation Cost Recovery Charge (CCRC or Base Charge per Therm):

The CCRC is the amount included in base rates dedicated to the recovery of CIP costs as approved by the Minnesota Public Utilities Commission in the Company's last general rate case. The CCRC is approved and applied on a per therm basis by dividing test-year CIP expenses by the test-year sales volumes (net of CIP-exempt volumes). All revenue received from the CCRC shall be credited to the CIP tracker account.

**CENTERPOINT ENERGY
 REFUND PLAN**

(1)	<u>BASIS OF REFUND OBLIGATION</u>		
(2)			
(3)	Approved level of Interim rate revenue	\$52,700,000	
(4)	Final approved revenue Increase	\$38,520,000	
(5)			
(6)			
(7)	<u>REFUND FACTOR CALCULATION (Prior to Adjustments)</u>		
(8)		\$14,180,000	line 3 less line 4
(9)		0.2691	line 8 ÷ by line 3
(10)			
(11)	<u>CALCULATION OF REFUND OBLIGATION</u>		
(12)			
(13)	Interim Revenues Billed	\$73,576,651	
(14)	Refund factor	<u>0.2691</u>	line 9
(15)	Refund amount	\$19,797,285	
(16)			
(17)	Interest to Refund	\$440,015	E-6
(18)	<u>Adjustments:</u>		
(19)	PRIME Program cost for 2020	(\$1,332,700)	E-3
(20)	ADIT Proration	(\$46,000)	E-4
(21)	2019 STI Refund	\$153,057	E-5
(22)	total adjustments	<u>(\$1,225,643)</u>	
(23)			
(24)	Refund Obligation (including Interest)	\$19,011,657	line 15+17+22
(25)	Refund Obligation (without Interest)	\$18,571,642	line 15+22
(26)			
(27)			
(28)	Refund Factor to be applied to customers' interim charges	0.25241	line 25 ÷ by line 13
(29)			
(30)	Refund - Taxable	\$18,571,642	line 25
(31)	Refund - Non-Taxable	\$440,015	line 17
(32)		<u>\$19,011,657</u>	line 30 + 31
(33)			
(34)	Interest to apply to Base Refund	2.369%	line 31 ÷ 30

note: lines 13 and 17 are estimated and will be updated with actuals. Will affect line 28 and 34 factors.

Supporting Schedules:

- E-3 line 19 - shows the adjustment necessary to reflect PRIME program - see settlement
- E-4 line 20 - shows the adjustment necessary to reverse ADIT proration original included interim rates- see initial interim rate filing
- E-5 line 21 - shows the adjustment necessary to refund STI - see 2019 STI Compliance Order in 2017 Rate Case Docket, G-008/GR-17-285

Illustrative Example: Residential Customer Interim Rate Refund

· The Company's billing system first calculates a "base refund" using the refund obligation without interest (Schedule E-2, line 25) and is applied to customers' interim surcharges, as illustrated below. This portion of the refund was taxable by local and state taxing authorities and is separated from the interest obligation. As shown below, the billing system determines sales tax and franchise fee refunds only on the base refund (taxable) portion of the refund when determining the total refund.

· The interest portion was not taxed when billed, and is excluded from the base refund factor applied to the interim surcharge in the system to prevent calculating refunds for sales tax and franchise fees on interest that customers did not pay during the interim revenue time period.

· The system applies a separate "interest refund" by using a percentage calculated by taking the interest obligation (Schedule E-2, line 17) and dividing it by the total refund obligation without interest (Schedule E-2, line 34). This interest refund percentage is applied to the "base refund" amount to refund the total refundable interest to each customer.

· Sales tax and franchise fee refund obligations are then also added to the "base refund" as part of the total refund.

(a)	(b)	Interim				Refund			Franchise		Total Refund (l = g+j+k)
		Usage (Therms) (c)	Surcharge ¹ (13.7%) (d)	Base Refund (taxable) ² (e= d x 0.25241)	Interest Refund ³ (Non-taxable) (f = e x 2.369%)	Before Taxes ⁴ (g = e + f)	Sales Tax ⁵ (h)	Franchise Fee ⁶ (i)	Sales Tax Refund ⁷ (j=e x h)	Franchise Refund ⁸ (k=e x i)	
Prorated	Jan-20	80	\$3.61	\$0.91	\$0.02	\$0.93	0.000%	2.0%	\$0.00	\$0.02	\$0.95
Actual	Feb-20	136	\$5.22	\$1.32	\$0.03	\$1.35	0.000%	2.0%	\$0.00	\$0.03	\$1.38
Actual	Mar-20	98	\$4.13	\$1.04	\$0.02	\$1.06	0.000%	2.0%	\$0.00	\$0.02	\$1.08
Actual	Apr-20	66	\$3.20	\$0.81	\$0.02	\$0.83	0.000%	2.0%	\$0.00	\$0.02	\$0.85
Actual	May-20	26	\$2.05	\$0.52	\$0.01	\$0.53	7.525%	2.0%	\$0.04	\$0.01	\$0.58
Actual	Jun-20	18	\$1.82	\$0.46	\$0.01	\$0.47	7.525%	2.0%	\$0.03	\$0.01	\$0.51
Actual	Jul-20	16	\$1.76	\$0.44	\$0.01	\$0.45	7.525%	2.0%	\$0.03	\$0.01	\$0.49
Actual	Aug-20	17	\$1.79	\$0.45	\$0.01	\$0.46	7.525%	2.0%	\$0.03	\$0.01	\$0.50
Actual	Sep-20	26	\$2.05	\$0.52	\$0.01	\$0.53	7.525%	2.0%	\$0.04	\$0.01	\$0.58
Actual	Oct-20	74	\$3.43	\$0.87	\$0.02	\$0.89	7.275%	2.0%	\$0.06	\$0.02	\$0.97
Actual	Nov-20	88	\$3.84	\$0.97	\$0.02	\$0.99	0.000%	2.0%	\$0.00	\$0.02	\$1.01
Actual	Dec-20	142	\$5.39	\$1.36	\$0.03	\$1.39	0.000%	2.0%	\$0.00	\$0.03	\$1.42
Actual	Jan-21	145	\$5.48	\$1.38	\$0.03	\$1.41	0.000%	2.0%	\$0.00	\$0.03	\$1.44
Actual	Feb-21	163	\$6.00	\$1.51	\$0.04	\$1.55	0.000%	2.0%	\$0.00	\$0.03	\$1.58
Estimated	Mar-21	139	\$5.31	\$1.34	\$0.03	\$1.37	0.000%	2.0%	\$0.00	\$0.03	\$1.40
Estimated	Apr-21	86	\$3.78	\$0.95	\$0.02	\$0.97	0.000%	2.0%	\$0.00	\$0.02	\$0.99
Estimated	May-21	60	\$3.03	\$0.76	\$0.02	\$0.78	7.525%	2.0%	\$0.06	\$0.02	\$0.86
		1,380	\$61.89	\$15.61	\$0.35	\$15.96			\$0.29	\$0.34	\$16.59

notes:

- (1) 13.7% x ((\$9.50 basic charge) + (\$0.21036 Resid Delivery x Col. C Usage))
- (2) Refund Factor - Total refund before interest as adjusted. See line 28 of refund plan. (Factor 0.2524)
- (3) Interest to apply to base refund amount - see line 34 of Refund Plan (2.526% of taxable refund)
- (4) Represents average refund calculations noted in Schedule G-2 - before tax and franchise fee
- (5) Sales Tax Rate - customer billed for State, County taxes- will vary by customer and location. Residential not billed in heating season.
- (6) Franchise Fee Rate - Assumes a Percent-of Revenue Franchise Fee. (No refund if per-meter based fee.)
- (7) Sale Tax refundable to Customer- Initially paid to State or Local authorities - CNP will reduce payment to authorities
- (8) Franchise Fee refundable to Customer: Initial Payment to City where customer is located will be reduced
- (9) Total Credit on Customer account

CERTIFICATE OF SERVICE

Marie Doyle served the Reply Comments CenterPoint Energy's General Rate Filing Docket No. G-008/GR-19-524 – 2019 Rate Case Compliance Filing.

CenterPoint Energy to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

/s/ _____
Marie M. Doyle
Regulatory Analyst
CenterPoint Energy

April 19, 2021

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Jorge	Alonso	jorge.alonso@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Andrew	Bahn	Andrew.Bahn@state.mn.us	Public Utilities Commission	121 7th Place E., Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Carolyn	Berninger	cberninger@mmcenter.org	Minnesota Center for Environmental Advocacy	26 E Exchange St Ste 206 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Jason	Bonnett	jason.bonnett@state.mn.us	Public Utilities Commission	121 East 7th Place suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Jocelyn	Bremer	jocelyn.bremer@minneapolis.mn.gov	City of Minneapolis	350 S Fifth St Ste 210 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
C. Ian	Brown	office@gasworkerslocal340.com	United Association	Gas Workers Local 340 312 Central Ave SW Minneapolis, MN 55414	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-524_GR-19-524 Official CC Service List
Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-524_GR-19-524 Official CC Service List
Dean	Dalzell	ddalzell@caphennepin.org	Community Action Partnership of Hennepin County	8800 Highway 7 Ste 401 St. Louis Park, MN 55426	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Raymond	Hetherington	raymond.hetherington@state.mn.us	Public Utilities Commission	121 East 7th Place St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	Yes	OFF_SL_19-524_GR-19-524 Official CC Service List
Bruce L.	Hoffarber	bhoffarber@kinectenergy.com	Kinect Energy Group	605 North Highway 169 Ste 1200 Plymouth, MN 55441	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Mary	Holly	mholly@winthrop.com	Winthrop & Weinstine, P.A.	225 S Sixth St Ste 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Max	Kieley	max.kieley@ag.state.mn.us	Office of the Attorney General-RUD	1400 Town Square Tower 445 Minnesota Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Daniel	LeFevers	dlefevers@gti.energy	GTI	1700 S Mount Prospect Rd Des Plaines, IL 60018	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Roger	Leider	roger@mnpropane.org	Minnesota Propane Association	PO Box 220 209 N Run River Dr Princeton, MN 55371	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_19-524_GR-19-524 Official CC Service List
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 68124-1000	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha	Norris	samanthanorris@aillantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Mike	OConnor	mocconnor@ibewlocal949.org	Local 949 IBEW	12908 Nicollet Ave S Burnsville, MN 55337	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Fairbault, MN 55021	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Generic Notice	Residential Utilities Division	residential_utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-524_GR-19-524 Official CC Service 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_19-524_GR-19-524 Official CC Service List
Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PLE Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-524_GR-19-524 Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Janet	Shaddix Eiling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_19-524_GR-19-524 Official CC Service List
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Andrew	Sudbury	Andrew.Sudbury@CenterPointEnergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55459-0038	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Amelia	Vohts	avohs@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 St. Paul, Minnesota 55104	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety	Minnesota Department of Public Safety 445 Minnesota Street Suite 147 St. Paul, MN 55101-1547	Electronic Service	No	OFF_SL_19-524_GR-19-524 Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cha	Xiong	cha.xiong@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St. Suite 1400 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_19-524_GR-19- 524 Official CC Service List