

July 21, 2020

**PUBLIC DOCUMENT**

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101

RE: **PUBLIC Comments of the Minnesota Department of Commerce – Division of Energy Resources**  
Docket No. G008/AI-20-495

Dear Mr. Wolf:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce (Department) in the following matter:

Petition of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, for Approval of an Affiliated Interest Agreement Regarding the Metro Belt Line System, Entitled 2020 (MBLSE) Replacement Project Contract Between CenterPoint Energy Minnesota Gas and Minnesota Limited, LLC.

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve CenterPoint Energy Minnesota Gas' Affiliated Interest Agreement with Minnesota Limited, LLC**. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ NANCY CAMPBELL  
Analyst Coordinator, CPA

NC/ar  
Attachment



## Before the Minnesota Public Utilities Commission

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### **PUBLIC Comments of the Minnesota Department of Commerce Division of Energy Resources**

Docket No. G008/AI-20-495

#### **I. INTRODUCTION**

On February 3, 2020, CenterPoint Energy Resources Corporation, d/b/a CenterPoint Energy Minnesota Gas (CPE or the Company) issued a request for proposals (RFP) for pipeline rehabilitation, construction and installation work regarding the Company's belt line system (Construction Contract).

On February 5, 2020, before awarding the Construction Contract to Minnesota Limited, LLC, CPE filed a letter indicating that CPE entered into an agreement to sell its affiliate, Minnesota Limited, LLC to Power Team Services, LLC.<sup>1</sup> The sale of Minnesota Limited, LLC was consummated on April 9, 2020, and as a result, CPE and Minnesota Limited are no longer affiliates. However, since CPE committed to filing for approval the Construction Contract in its Comments filed on April 2, 2020, in Docket No. G008/AI-19-292, CPE filed its current Petition.<sup>2</sup>

On April 17, 2020, CPE and Minnesota Limited, LLC. entered into a contract for pipeline rehabilitation, construction, and installation work relative to its Belt Line System. The Construction Contract was entered into after a competition bidding process. The Construction Contract will conclude on February 28, 2021.

On May 13, 2020, CPE filed a Petition with the Minnesota Public Utilities Commission (Commission) seeking approval of an Affiliated Interest Agreement – Construction Contract with Minnesota Limited, LLC.

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<sup>1</sup> Filed in Docket No. G008/AI-19-292, Petition of CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas for Approval of an Affiliated Interest Agreement between CenterPoint Energy Minnesota Gas and Minnesota Limited.

<sup>2</sup> Specifically, in its response to a Notice of Request for Information and Subsequent Comment Period, CPE stated:

Minnesota Limited has historically been the contractor for the construction and replacement of the Company's "beltline" system, which is the high-pressure distribution system that circles the Twin Cities metropolitan area. The Company plans to continue work on the beltline in the 2020 construction season and Minnesota Limited has recently been awarded the 2020 construction contract through the Company's bidding process. The Company is preparing an affiliate filing and we will submit the 2020 Minnesota Limited contract for the Commission's review pursuant to the affiliate transaction rules.

## II. DEPARTMENT ANALYSIS

### A. APPLICABLE STATUTES AND RULES

Minn. Stat. § 216B.48 and Minn. R. 7825.2200 (B) govern the substantive criteria related to the Affiliated Interest Agreement - Construction Contract. These provisions do not establish an explicit timeframe for Commission action.

Minnesota Statutes dictate the requirements necessary to be met for affiliated service agreements at Minnesota Statute section 216B.48, subd. 3 as follows:

*No contract or arrangement, including any general or continuing arrangement, providing for the furnishing of management, supervisory, construction, engineering, accounting, legal, financial, or similar services, and no contract or arrangement for the purchase, sale, lease, or exchange of any property, right, or thing, or for the furnishing of any service, property, right, or thing, other than those above enumerated, made or entered into after January 1, 1975 between a public utility and any affiliated interested as defined in subdivision 1, clauses (1) to (8), or any arrangement between a public utility and an affiliated interest as defined in subdivision 1, clause (9), made or entered into after August 1, 1993, is valid or effective unless and until the contract or arrangement has received the written approval of the commission. (Emphasis added)*

Minnesota Statute section 216B.48, subd. 3 additionally provides two tests to be applied by the Commission in cases of affiliated-interest contracts; the burden of proof for satisfying these tests rests with the Company:

*The commission shall approve the contract or arrangement made or entered into after that date only if it clearly appears and is established upon investigation that it is reasonable and consistent with the public interest. No contract or arrangement may receive the Commission's approval unless satisfactory proof is submitted to the commission of the cost to the affiliated interest of rendering the services or of furnishing the property or service to each public utility. Proof is satisfactory only if it includes the original or verified copies of the relevant cost records and other relevant accounts of the affiliated interest, or an abstract or summary as the commission may deem adequate, properly identified and duly authenticated, provided, however, that the commission may, where reasonable, approve or disapprove the contracts or arrangements without the submission of cost records or accounts. The burden of proof to establish the reasonableness of the contract or arrangement is on the public utility. (Emphasis added)*

Specifically, the burden of proof is on the Company to show that the Affiliated Interest - Construction Contract is both reasonable and consistent with the public interest. If the Commission determines that CPE has met its burden of proof, the Commission shall approve the Affiliated Interest – Construction Contract.

Finally, Minnesota Statute section 216B.48, subd. 6 is clear that the Commission has continuing authority over the Affiliated Interest – Construction Contract if actual experience results in rates that are unreasonable:

**Subd. 6. Commission retains continuing authority over contract.**

The commission shall have continuing supervisory control over the terms and conditions of the contracts and arrangements as are herein described so far as necessary to protect and promote the public interest. The commission shall have the same jurisdiction over the modifications or amendment of contracts or arrangements as are herein described as it has over such original contracts or arrangements. The fact that the commission shall have approved entry into such contracts or arrangements as described herein shall not preclude disallowance or disapproval of payments made pursuant thereto, if upon actual experience under such contract or arrangement it appears that the payments provided for or made were or are unreasonable.

***B. FILING REQUIREMENTS***

In Docket No. E, G-999/CI-98-651, the Commission provided minimum filing requirements that must be satisfied within 30 days of executing a contract or arrangement with an affiliate.<sup>3</sup> The Order in this docket also requires that within 30 days of executing a contract or arrangement with an affiliate, the utility must make a filing that includes the following information:

1. A heading that identifies the type of transaction.
2. The identity of the affiliated parties in the first sentence.
3. A general description of the nature and terms of the agreement, including the effective date of the contract or arrangement and the length of the contract or arrangement.

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<sup>3</sup> In the Matter of a Commission Investigation into Procedures for Reviewing Public Utility Affiliated Interest Contracts and Arrangements, ORDER INITIATING REPEAL OF RULE, GRANTING GENERIC VARIANCE, AND CLARIFYING INTERNAL OPERATING PROCEDURES (September 14, 1998).

4. A list and the past history of all current contracts or agreements between the utility and the affiliate, the consideration received by the affiliate for such contracts or agreements, and a summary of the relevant cost records related to these ongoing transactions.
5. A descriptive summary of the pertinent facts and reasons why such contract or agreement is in the public interest.
6. The amount of compensation and, if applicable, a brief description of the cost allocation methodology or market information used to determine cost or price.
7. If the service or good acquired from an affiliate is competitively available, an explanation must be included stating whether competitive bidding was used and, if it was used, a copy of the proposal or a summary must be included. If it is not competitively bid, an explanation must be included stating why bidding was not used.
8. If the arrangement is in writing, a copy of that document must be attached.
9. Whether, as a result of the affiliate transaction, the affiliate would have access to customer information, such as customer name, address, usage or demographic information.
10. The filing must be verified.

CPE also addressed additional requirements pursuant to the following Commission Orders:

- July 11, 1996 in Docket No. G008/AI-96-37, the Commission ordered the Company to address: 1) the quantification of cost savings and other ratepayer benefits and 2) the explanation of changes made to the cost allocation manual or reasons why changes are not necessary. CPE addressed these two requirements on page 6 of its petition.
- December 30, 2019 in Docket No. G008/AI-19-292, the Commission ordered the Company to propose improved procurement practices in future affiliated interest agreements. CPE provided the list of improvements to procurement practices on page 7 of its petition.

On pages 3 to 7 of the petition, CPE provided the affiliated-interest requirements for Minnesota Rule 7825.2200B and for the two Commission Orders in Docket Nos. G008/AI-96-37 & G008/19-292, along with a brief explanation of how the Company believes it has satisfied each requirement. The Department agrees and concludes that CPE complied with the filing requirements under Minnesota Rule 7825.2200B and Commission Orders in Docket Nos. G008/AI-96-37 and G008/19-292.

### *C. ANALYSIS OF PROPOSAL*

#### **1. Competitive Bid Process**

On pages 5 and 6 of the Petition, CPE explained that they initiated a formal RFP process beginning with a pre-bid meeting on November 14, 2019. CPE invited six vendors representing a mix of local and national distribution pipeline companies serving the Midwest region to bid. All six invited bidders

initially committed to submitting bids; however, only three of the invited bidders actually offered bids. CPE, in evaluating the submitted bids, reviewed the design details as well as each phase of construction. CPE noted that the bid documentation enumerated project design specification, including line item quantities and lump sum price requirements. CPE noted the following regarding cost comparisons of the bidders:

**[TRADE SECRET INFORMATION HAS BEEN EXCISED]** the Company awarded the bid to Minnesota Limited. The award to Minnesota Limited allows the Company to be prudent with capital dollars and gain pipeline construction capacity, assuring all planned capital construction projects can be completed on time and on plan in 2020.

In Department Information Request No. 1, we asked CPE to tie the construction contract amount to the amount included in the test-year rate case in Docket No. G008/GR-19-524 (2019 Rate Case) and to provide enough detail to make an apples-to-apples comparison of the Construction Contract amount to the test year amount. CPE indicated that it did not incorporate vendor level cost estimates in its 2019 Rate Case.<sup>4</sup> As a result, the Department is further reviewing this Construction Contract amount for the Belt Line project and comparing it to the 2019 Rate Case amount on a per mile basis by individual component, as discussed in the July 15, 2020 Direct Testimony of Mark Johnson for the Department.

In Department Information Request No. 2, we asked CPE to briefly describe the type of work, including the dollar amounts and miles of pipe that CPE requested its Blanket Contractor to complete in 2020. The Department also asked CPE to show how the amounts for the Blanket Contractor work in 2020 tie to the amounts included in the 2019 Rate Case. CPE provided the following response:

While the Company creates general plans and priorities for its construction activities each year, its specific slate of work is subject to emerging repair needs, customer and government requests, scheduling constraints, and costs versus budget. Please see Attachment 1, which shows the types and costs of work the Company has requested that its Blanket Contractor complete so far in 2020 (January through May), totaling **[TRADE SECRET INFORMATION HAS BEEN EXCISED]** and encompassing main, service, meter, and regulator station work.

The amounts in part (a) will not tie to any figure from the Company's rate case filing because they represent only five months of the test year, and the forecast was not done at the vendor level. The capitalized portion would fall within the plant additions shown in Exhibit \_\_ (DAP-WP), Schedule 4, Workpaper 4.

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<sup>4</sup> The Department has attached our two information requests and responses of CPE to these comment as Department Attachment 1. The Department did not include CPE's Attachment 1 to its response to Department Information Request No. 2, since it was 102 pages, however, this attachment is available upon request.

The Department considers the Company's information about the level of construction work that CPE's Blanket Contractor will perform to be helpful in supporting CPE's decision to use Minnesota Limited, LLC to handle the Belt Line related contract work. However, we were unable to compare the Blanket Contract work amount (as noted above) to the 2019 Rate Case. As a result, the Department is also further reviewing this Blanket Contractor work amount to the 2019 Rate Case amounts on a per mile basis by individual component, as discussed in the July 15, 2020 Direct Testimony of Mark Johnson for the Department.

The Department reviewed CPE's Exhibit C – Competitive Bid Sheet and Exhibit D – Competitive Bid Recommendation, along with CPE's response to Department Information Request Nos. 1 and 2. The Department considers that use of the competitive bid process and **[TRADE SECRET INFORMATION HAS BEEN EXCISED]** as discussed in CPE's response to Department Information Request No. 2. Based on our review, we consider CPE's selection of Minnesota Limited, LLC for the Construction Contract for Belt Line work to be reasonable.

## 2. Is the Construction Contract Reasonable and in the Public Interest?

CPE provided the following summary of the terms of the Construction Contract:

The Construction Contract relates to services provided in connection with the Company's beltline replacement project. The Construction Contract was effective on April 17, 2020 and will expire on February 28, 2021.

The Construction Contract is part of the 2020 Metro Belt Line<sup>5</sup> construction project. The work to be performed includes all supervision, labor and equipment to install approximately 20,728 feet of pipe associated with four segments of large diameter steel main located in the Cities of Golden Valley, Crystal, New Hope, Edina and Fridley. Additional detailed description is included in the Scope section of the Construction Contract which is attached as Exhibit B.

CPE discussed the consideration received by the Affiliated Interest – Minnesota Limited and provided the summary of Relevant Costs, as follows:

The total to be paid under this contract is estimated to be **[TRADE SECRET INFORMATION HAS BEEN EXCISED.]**

The estimated value of the Construction Contract, above, includes all supervision, labor and equipment to install large diameter high pressure steel pipe as well as various diameter low pressure steel pipe and below

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<sup>5</sup> The Metro Belt Line project is part of the Transmission Pipeline Replacement Project that is discussed in the 2019 Rate Case. For additional information on the Transmission Pipeline Replacement Project, please see the testimony of Mr. Trey Kuchar starting at page 34 in the 2019 Rate Case.

grade vaults. The estimated value also contains a contingency amount to cover potential cost overruns and unforeseen circumstances. Details concerning cost components are provided in the Unit Price section, pages 10 through 28, of the Construction Contract included as Exhibit B.

The Department reviewed the Construction Contract in CPE's Exhibit B. Based on our review, the Department recommends that the Construction Contract between CPE and Minnesota Limited, LLC to be approved because the contract price, contingency amount, and overall contract terms appear to be reasonable.

CPE provided the following discussion for its belief that the Construction Contract is in the public interest:

Minnesota Limited has worked on the Company's distribution system before as has been described in prior AI dockets, and is one of the largest transmission pipeline contractors in the region. Capital infrastructure investments have increased throughout the country in the natural gas and other industries, increasing the demand for qualified transmission and distribution pipeline contractor resources. It is in the public interest that the Company secure qualified and reliable resources to ensure completion of its critical pipeline replacement projects. Minnesota Limited has extensive experience in providing pipeline dig services to a wide variety of customers throughout the United States. These projects range from routine excavation, recoating, backfill and remediation in a farm field to deep excavation in saturated wetland areas. Minnesota Limited also provides maintenance services for pipeline systems including valve maintenance, recoating, sleeving, line lowering, pipeline markers, anomaly investigation and right of way clearing.

CPE also noted that a competitive bid process was used to select Minnesota Limited.

The Department agrees with CPE that the selection of Minnesota Limited, LLC is supported and in the public interest, for the reasons indicated above. As a result, the Department recommends that the Commission approve the Affiliated Interest Agreement – Construction Contract between CPE and Minnesota Limited, LLC.

### **III. CONCLUSIONS AND RECOMMENDATIONS**

The Department concludes that CPE complied with the filing requirements under Minnesota Rule 7825.2200B and Commission Orders in Docket Nos. G008/AI-96-37 and G008/19-292.

The Department reviewed CPE's Exhibit C – Competitive Bid Sheet and Exhibit D – Competitive Bid Recommendation, along with CPE's response to Department Information Request Nos. 1 and 2. Based



on our review, we consider CPE's selection of Minnesota Limited, LLC for the Construction Contract for Belt Line work to be reasonable, given the reasons for the Department's conclusions identified above.

The Department reviewed the Construction Contract in CPE's Exhibit B. Based on our review, the Department recommends that the Construction Contract between CPE and Minnesota Limited, LLC to be approved because the contract price, contingency amount, and overall contract terms appear to be reasonable.

The Department agrees with CPE that the selection of Minnesota Limited, LLC is supported and in the public interest. As a result, the Department recommends that the Commission approve the Affiliated Interest Agreement – Construction Contract between CPE and Minnesota Limited, LLC.

/ar

**Public**

**Department Attachment No. 1**

**Department's Information Requests and CenterPoint Energy's  
Responses**

**Docket No. G008/AI-20-495**

**State of Minnesota  
Department of Commerce**

**Utility Information Request**

Docket Number: G-008/AI-20-495 - Affiliated Interest Agreement

Date of Request: 6/8/2020

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 6/18/2020

Analyst Requesting Information: Nancy Campbell

Type of Inquiry: Financial

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
DOC 001	<p data-bbox="384 779 786 817">Topic: Construction Contract</p> <p data-bbox="384 817 1102 855">Reference(s): Page 3 of CPE's May 15, 2020 Petition</p> <ol style="list-style-type: none"><li data-bbox="384 880 1393 1032">a. Please tie the construction contract amount shown on page 3 of CenterPoint Energy's (CPE's) May 15, 2020 Petition to the amount included in the test-year rate case in Docket No. G008/GR-19-524 (current rate case).</li><li data-bbox="384 1070 1393 1263">b. Please provide enough detail in part (a) to make an apple-to-apple comparison of the construction contract amount and test year amount for the same construction work. If the amount included in the current rate case test-year is higher than the contract amount, please explain reasons for differences and why this reasonable.</li></ol> <p data-bbox="384 1328 531 1366"><b>Response:</b></p> <ol style="list-style-type: none"><li data-bbox="384 1391 1393 1695">a. On Page 3 of Exhibit____(WAK-WP), Sch. 2, WP 4, in Docket No. G-008/GR-19-524 the calculation of the 2020 rate case expenses for the Beltline project were forecasted based off of 2017 and 2018 Beltline sub-projects and created a per mile average cost of 6,850,000. This amount is an all-in figure and includes materials and overhead associated with the projects. The rate case forecast did not incorporate vendor level cost estimates as discussed on pages 16 and 17 of Mr. Kuchar's Direct Testimony in Docket No. G-008/GR-19-524.</li><li data-bbox="384 1733 1393 1850">b. As indicated in part a., vendor level cost estimates were not incorporated into the Beltline forecast in Docket No. G-008/GR-19-524. Therefore, an apples-to-apples comparison is not applicable.</li></ol>

Response By: Erica Larson  
Title: Senior Analyst, Regulatory & Rates  
Department: Mng Smr Reg Svc Rev Req  
Telephone: 612-321-4334

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Telephone: 612-321-4334

**State of Minnesota  
Department of Commerce**

**Utility Information Request**

Docket Number: G-008/AI-20-495 - Affiliated Interest Agreement

Date of Request: 6/8/2020

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 6/18/2020

Analyst Requesting Information: Nancy Campbell

Type of Inquiry: Financial

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
DOC 002 P	<p data-bbox="384 779 746 817">Topic: Blanket Contractor</p> <p data-bbox="384 817 858 855">Reference(s): No specific reference</p> <ol style="list-style-type: none"><li data-bbox="384 880 1393 992">a. Please briefly describe the type of work, including the dollar amounts and miles of pipe that CPE has requested its Blanket Contractor to complete in 2020.</li><li data-bbox="384 1032 1393 1106">b. Please show that the amounts in part (a) tie to the amounts included in the current rate case test-year.</li></ol> <p data-bbox="384 1171 531 1209"><b>Response:</b></p> <p data-bbox="384 1249 1393 1668">CenterPoint Energy Minnesota Gas has designated information in this document as trade secret. The information meets the definition of trade secret in Minn. Stat. § 13.37, subd. 1(b), as follows: (1) the information was supplied by CenterPoint Energy Minnesota Gas, the affected organization; (2) CenterPoint Energy Minnesota Gas has taken all reasonable efforts to maintain the secrecy of the information; and (3) the protected information contains contractual details and cost information which derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use. The trade secret information has been excised from the document.</p> <p data-bbox="384 1713 1393 1863">While the Company creates general plans and priorities for its construction activities each year, its specific slate of work is subject to emerging repair needs, customer and government requests, scheduling constraints, and costs versus budget. Please see Attachment 1, which shows the types and costs of</p>

Response By: Erica Larson  
Title: Senior Analyst, Regulatory & Rates  
Department: Mng Smr Reg Svc Rev Req  
Telephone: 612-321-4334

work the Company has requested that its Blanket Contractor complete so far in 2020 (January through May), totaling [**TRADE SECRET INFORMATION BEGINS... ..TRADE SECRET INFORMATION ENDS**] and encompassing main, service, meter, and regulator station work.

The amounts in part (a) will not tie to any figure from the Company's rate case filing because they represent only five months of the test year, and the forecast was not done at the vendor level. The capitalized portion would fall within the plant additions shown in Exhibit \_\_ (DAP-WP), Schedule 4, Workpaper 4.

**NON-PUBLIC DOCUMENT  
CONTAINS PRIVILEGED INFORMATION**

CenterPoint Energy has designated this entire document as trade secret. The document meets the definition of trade secret in Minn. Stat. § 13.37, subd. 1(b), as follows: (1) the document was supplied by CenterPoint Energy, the affected organization; (2) CenterPoint Energy has taken all reasonable efforts to maintain the secrecy of the document, including protecting it from disclosure in this proceeding; and (3) the document derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.

Public and non-public contents are intertwined and interspersed throughout as to make the entire attachment non-public. The trade secret and non-public information has been excised from the public attachment.

In accordance with Minn. Rule 7829.0500, Subp. 3, CenterPoint Energy furnishes the following description of the document:

Nature of the Material: Proprietary and Confidential Information

Author: CenterPoint Energy, Inc.

General Import: Contractor Pricing Document

Date the Document was Prepared: June 2020

**CERTIFICATE OF SERVICE**

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, 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 Nos. **G008/AI-20-495**

Dated this **21st** day of **July, 2020**.

/s/Linda Chavez

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street  Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-495_AI-20-495
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-495_AI-20-495
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-495_AI-20-495
Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-495_AI-20-495
Steven	Clay	Steven.Clay@CenterPointEnergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_20-495_AI-20-495
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_20-495_AI-20-495
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_20-495_AI-20-495
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-495_AI-20-495
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_20-495_AI-20-495
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_20-495_AI-20-495

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-495_AI-20-495
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-495_AI-20-495
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-495_AI-20-495
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_20-495_AI-20-495
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_20-495_AI-20-495
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-495_AI-20-495
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	No	OFF_SL_20-495_AI-20-495
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-495_AI-20-495
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-495_AI-20-495

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-495_AI-20-495