



July 19, 2024

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

RE: Center for Energy and Environment’s Reply Comments in the Matter of a Commission Investigation into Gas Utility Resource Planning

Docket Numbers G008, G002, G011/CI-23-117, and G999/CI-21-565

Dear Mr. Seuffert,

Center for Energy and Environment (“CEE”) respectfully submits these Reply Comments to the Minnesota Public Utilities Commission (“Commission”) in response to Comments filed by Xcel Energy, CenterPoint Energy, Minnesota Energy Resources Corporation (“MERC”) (collectively “natural gas utilities”), the Minnesota Department of Commerce Division of Energy Resources (“Department”), the Office of the Attorney General, the Citizens’ Utility Board (“CUB”), the Clean Energy Organizations (“CEOs”), and the Building Decarbonization Coalition on June 28, 2024 in response to the May 7, 2024 Commission Notice of Extended Comment Period in the Matter of a Commission Investigation into Gas Utility Resource Planning (“Notice”).

CEE thanks parties for their engagement and thoughtful Comments. We found there to be broad alignment in the June 28, 2024 Comments in this docket. We focus these Reply Comments on three remaining issues:

1. The cost threshold to be applied to capacity expansion projects for the selection of projects for expansion alternatives analyses.
2. The appropriate value or data source to estimate the regulatory cost of greenhouse gas emissions.
3. Requirements for Xcel Energy’s methane emissions reporting, a reporting metric originally approved in Xcel Energy’s Performance Metrics docket.¹

¹ Docket Number E002/CI-17-401

Cost Threshold for the Selection of Projects for the Expansion Alternatives Analysis

In our November 30, 2023 Comments in phase one of this docket, CEE stated:

We recommend that the Commission encourage utilities to adopt a range of different project characteristics and sizes (i.e. cost) for [Expansion Alternatives Analyses], so that we can collectively learn more about how to evaluate different types of projects and what types of projects may be best-suited for a full alternatives analysis.²

In our June 28, 2024 Comments, we stated:

CEE recommends the Commission establish a cost threshold for each utility that results in a pool of projects, of different sizes and types, from which to choose projects for the Expansion Alternatives Analyses. For the initial natural gas IRPs, we recommend that the Commission require utilities to present possible expansion projects to the Gas Utility Innovation Roundtable stakeholders and collaboratively work with stakeholders to select projects for the initial Expansion Alternatives Analyses.³

We also recommended utilities consider additional factors when selecting expansion projects for an Expansion Alternatives Analysis (“EAA”), including the potential for learning, equity impacts, and emissions reductions when selecting projects for alternatives analyses. CEE continues to support this approach.

In the June 18, 2024 Gas Utility Innovation Roundtable meeting, stakeholders asked the natural gas utilities to provide the number of distribution system projects conducted over a five-year lookback period at and above a \$1 million, \$3 million, \$5 million, \$10 million, and \$15 million threshold. The natural gas utilities provided that information in their June 28, 2024 Comments in this docket. CEE found the natural gas utilities’ response to stakeholders’ request to be informative, and we appreciate the utilities’ work to consolidate and provide this information so quickly.

Table 1 illustrates the number of projects at or above each of the requested cost thresholds, over a five-year lookback period, for each of the natural gas utilities, as provided in their June 28, 2024 Comments in this docket.

² P. 32 of CEE’s November 30, 2023 Comments in this docket.

³ P. 14 of CEE’s June 28, 2024 Comments in this docket.

Table 1. Capacity expansion projects implemented over a five-year lookback period, at different cost thresholds, by utility.

Utility	Project Cost Threshold				
	\$1m	\$3m	\$5m	\$10m	\$15m
CenterPoint Energy ⁴	15	5	4	4	4
Xcel Energy ⁵	6	4	*	*	*
MERC ⁶	6	2	2	2	1

* No information specified in initial comments

Given the relatively low numbers of projects qualifying at the lowest cost threshold (\$1 million)—6, 6, and 15 projects respectively for MERC, Xcel Energy, and CenterPoint Energy—we believe that \$1 million is an appropriate cost threshold for consideration for an EAA.

CEE recommends the Commission adopt the following decision option. We note that we collaborated with CUB to align on language for this recommendation. We propose replacing Order Point 51 from the Commission’s March 27, 2024 Order in this docket with the following decision option.

Integrated resource plans shall include infrastructure projects related to resource expansion or new resources at or above a \$1 million threshold from which utilities select projects for an Expansion Alternatives Analysis. Utility resource plans shall include a discussion of the rationale for the projects selected for an Expansion Alternatives Analysis, and summary of the utility’s discussions with stakeholders throughout the selection process.

At the July 12, 2024 Gas Utility Innovation Roundtable, utilities noted that the number of potential infrastructure projects at different cost thresholds can vary significantly over time and that the number of projects at different cost thresholds over the past five years may not be reflective of the number of projects in a future five-year period. The utilities expressed concern about the potential workload of including project descriptions for many capital projects in their future natural gas resource plans. The Commission may wish to include a cap on the number of projects to be described and considered for an EAA for the first natural gas utility resource plans to address utilities’ concerns. If the Commission chooses to establish a cap, CEE recommends the cap be set at ten projects per utility plan.

Regulatory Cost of Greenhouse Gas Emissions

⁴ CenterPoint Energy’s June 28, 2024 Comments in this docket.

⁵ Xcel Energy’s June 28, 2024 Comments in this docket.

⁶ MERC’s June 28, 2024 Comments in this docket.

CEE believes the regulatory cost of greenhouse gas emissions is an important input to the natural gas resource planning process. Order Point 15 of the Commission’s March 27, 2024 Order in this docket stated, “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.”

In our June 28, 2024 Comments, CEE provided two examples of regulatory costs of greenhouse gases that could be considered for the natural gas resource planning process: the regulatory cost of carbon adopted for electric resource planning⁷ and the natural gas environmental compliance cost adopted for the cost-effectiveness in the Energy Conservation and Optimization (“ECO”) program.⁸ We note that both of these values may be relevant for natural gas resource planning and are not necessarily mutually exclusive.

We look forward to reviewing utility and stakeholder feedback and comments on this issue through the Reply Comments in this docket. However, we acknowledge that there has been limited record development on this matter in the docket to date and additional stakeholder discussion beyond the current comment period may be helpful. Therefore, at this time, CEE provides a procedural recommendation that could allow for further record development on this matter without delaying the initial natural gas utility resource plans. Specifically, we recommend the Commission consider and determine the appropriate data source and values for the regulatory cost of greenhouse gas emissions for natural gas resource planning through the upcoming docket to update the regulatory cost of carbon for electric resource planning.⁹

The Commission issued an order in Docket Number E999/CI-07-1199 in December 2023 establishing the regulatory cost of carbon to be applied to electric resource planning.¹⁰ Historically, the Commission has issued an order updating the regulatory cost of carbon for electric resource planning every two years. As such, we anticipate a docket process to review and update the regulatory cost of carbon for electric resource planning with a final Commission order in late 2025. If the Commission adopts the proposed filing due date of late 2026 for the first natural gas utility resource plan, an order establishing the regulatory cost of greenhouse gases for natural gas resource planning in late 2025 would provide approximately a year for the first natural gas utility to incorporate the values into its planning process. We believe this would be sufficient time for the first natural gas utility to conduct its resource planning analysis.

⁷ Docket Number E999/CI-07-1199.

⁸ Page 252 of the March 31, 2023 Department of Commerce Decision In the Matter of 2024-2026 CIP Cost-Effectiveness Methodologies for Electric and Gas Investor-Owned Utilities in Docket Number E,G999/CIP-23-46.

⁹ Docket Number E999/CI-07-1199.

¹⁰ The Commission’s December 19, 2023 Order Addressing Environmental and Regulatory Costs in Docket Numbers E999/CI-07-1199, E999/DI-22-236, and E999/CI-14-643.

Moreover, not only would this process provide for additional record development on the appropriate regulatory cost of greenhouse gas emissions for natural gas resource planning, but we also believe that there may be efficiency in discussing the appropriate regulatory costs of greenhouse gas emissions for both electric and natural gas resource planning in the same proceeding and on the same timeline and cadence.

A proposed decision option for this process is as follows:

The appropriate data source, values, and application of the regulatory cost of greenhouse gas emissions for natural gas resource planning shall be considered in Docket Number E999/CI-07-1199.

Xcel's Methane Emissions Reporting

In Commission Staff's Notice in this docket, Staff requested that parties provide input into what direction, if any, the Commission should provide to Xcel Energy regarding Xcel Energy's reporting requirement for methane emissions. Xcel Energy's methane emissions reporting requirement was originally approved in Xcel Energy's Performance Metrics docket, Docket Number E002/CI-17-401.

In its Straw Proposal, Xcel Energy recommended using recognized protocols, like the EPA's 40 CFR Part 98, Subpart W,¹¹ which applies to on- and offshore natural gas production, processing, transmission, storage, equipment, and distribution.¹² In June 28, 2024 Comments in this docket, the CEOs recommended a methane emissions reporting tool from M.J. Bradley & Associates, which consolidates several data sources to provide an estimate of full lifecycle greenhouse gas accounting.¹³

CEE recommends that the Commission require Xcel Energy to report estimates of the full fuel cycle methane emissions associated with its gas system using both the EPA and M.J. Bradley & Associates methodologies, along with any other appropriate tools Xcel Energy identifies, in their first natural gas resource plan filing. We look forward to reviewing the data and tools in Xcel Energy's first natural gas resource plan.

Comprehensive Order

We recommend that the Commission issue a comprehensive, final order in this docket that includes all the requirements and definitions adopted by the Commission, in both phase one and

¹¹ Xcel's May 31, 2024 Straw Proposal in this docket.

¹² The U.S. EPA's 2010 rule, 75 FR 74488 on *Mandatory Reporting of Greenhouse Gases: Petroleum and Natural Gas Systems*. <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-98/subpart-W>

¹³ P. 4 of the CEO's June 28, 2024 Comments in this docket.

phase two of this docket, for natural gas resource planning in Minnesota. Issuing a final, comprehensive order that includes all natural gas planning requirements will make the process clear and more accessible to stakeholders going forward, especially stakeholders who may not have been involved in this docket to date.

Additionally, issuing a comprehensive, final order in this docket could address stakeholder confusion regarding the distribution system analysis and expansion alternatives analysis requirements of the Commission's March 27, 2024 Order (discussed in our June 28, 2024 Comments in this docket). We believe that replacing Order Point 51 from the March 27, 2024 Order with the recommended decision option above would clarify the requirements and expectations for the expansion alternatives analysis.

Conclusion

In conclusion, CEE recommends that the Commission adopt the following additional decision options.

- Integrated resource plans shall include infrastructure projects related to resource expansion or new resources at or above a \$1 million threshold from which utilities select projects for an Expansion Alternatives Analysis. Utility resource plans shall include a discussion of the rationale for the projects selected for an Expansion Alternatives Analysis, and summary of the utility's discussions with stakeholders throughout the selection process.¹⁴
- The appropriate data source, values, and application of the regulatory cost of greenhouse gas emissions for natural gas resource planning shall be considered in Docket Number E999/CI-07-1199.
- Xcel Energy shall report estimates of the full fuel cycle methane emissions associated with its gas system using both the EPA and M.J. Bradley methodologies, along with any other appropriate tools the Company identifies, in their first natural gas resource plan filing.

We thank the Commission for considering our Reply Comments. Please contact me at apartridge@mncee.org with any questions.

Sincerely,

/s/ Audrey Partridge
Director of Policy
Center for Energy and Environment

¹⁴ We recommend that this proposed decision option replace Order Point 51 from the Commission's March 27, 2024 Order in this docket.

AFFIDAVIT OF SERVICE

DOCKET NUMBERS G008, G002, G011/CI-23-117 and G999/CI-21-565

I, Audrey Partridge, herby certify that on this 19th day of July 2024, I served *Center for Energy and Environment's Reply Comments in the Matter of a Commission Investigation into Gas Utility Resource Planning* in Docket Numbers G008, G002, G011/CI-23-117 and G999/CI-21-565 on the following persons on the attached Service Lists by:

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

X electronic filing

/s/ Audrey Partridge
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David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
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_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
M. William	O'Brien	bobrien@mojaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
Ric	O'Connell	ric@gridlab.org	GridLab	2120 University Ave Berkeley, CA 94704	Electronic Service	No	OFF_SL_21-565_Official Service List
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-565_Official Service List
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-565_Official Service List
Jessica	Palmer Denig	jessica.palmer- Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-565_Official Service List
Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC	3330 Washington Blvd Ste 400 Arlington, VA 22201	Electronic Service	No	OFF_SL_21-565_Official Service List
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-565_Official Service List
Catherine	Phillips	Catherine.Phillips@wecene rgygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-565_Official Service List
J. Gregory	Porter	greg.porter@nngco.com	Northern Natural Gas Company	1111 South 103rd St Omaha, NE 68124	Electronic Service	No	OFF_SL_21-565_Official Service List
Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, MN 55117	Electronic Service	No	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_21-565_Official 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_21-565_Official 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_21-565_Official Service List
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_21-565_Official Service List
Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth	500 East Grant Street 1207 #1207 Minneapolis, MN 55404	Electronic Service	No	OFF_SL_21-565_Official Service List
Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications	2378 Wilshire Blvd. Mound, MN 55364	Electronic Service	No	OFF_SL_21-565_Official 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_21-565_Official Service List
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-565_Official Service List
Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center	8421 Wayzata Blvd Ste 300 Golden Valley, MN 55426	Electronic Service	No	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Serfass	pserfass@ttcorp.com	American Biogas Council	1211 Connecticut Ave NW Ste 650 Washington, DC 20036	Electronic Service	No	OFF_SL_21-565_Official Service List
Patrick	Serfass	info@americanbiogascoun cil.org	American Biogas Council	1211 Connecticut Ave NW Ste 650 Washington, DC 20036	Electronic Service	No	OFF_SL_21-565_Official Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-565_Official Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_21-565_Official Service List
Andrew R.	Shedlock	Andrew.Shedlock@KutakR ock.com	Kutak Rock LLP	60 South Sixth St Ste 3400 Minneapolis, MN 55402-4018	Electronic Service	No	OFF_SL_21-565_Official Service List
Colleen	Sipiorski	Colleen.Sipiorski@wecener gygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_21-565_Official Service List
Edyta	Sitko	esitko@ucsusa.org	Union of Concerned Scientists	1 N Lasalle Ave CHICAGO, IL 60602	Electronic Service	No	OFF_SL_21-565_Official Service List
Ken	Smith	ken.smith@districtenergy.c om	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-565_Official Service List
Joshua	Smith	joshua.smith@sierraclub.or g		85 Second St FL 2 San Francisco, CA 94105	Electronic Service	No	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Paper Service	No	OFF_SL_21-565_Official Service List
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_21-565_Official Service List
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
Mark	Spurr	mospurr@fvbenergy.com	International District Energy Association	222 South Ninth St., Suite 825 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-565_Official Service List
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official 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_21-565_Official Service List
Kent	Sulem	ksulem@mmua.org	MMUA	3131 Fernbrook Ln N Ste 200 Plymouth, MN 55447-5337	Electronic Service	No	OFF_SL_21-565_Official Service List

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_21-565_Official Service List
Matthew	Tomich	tomich@energy-vision.org	Energy Vision	138 E 13th St New York, NY 10003	Electronic Service	No	OFF_SL_21-565_Official Service List
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-565_Official Service List
Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC	700 Universe Blvd Juno Beach, FL 33408	Electronic Service	No	OFF_SL_21-565_Official Service List
Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas	1017 L Street #513 Sacramento, CA 95814	Electronic Service	No	OFF_SL_21-565_Official Service List
Nicole	Westling	nicole.westling@state.mn.us	Department of Commerce	85 7th Place E Suite 280 St Paul, MN 55001	Electronic Service	No	OFF_SL_21-565_Official Service List
Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group	605 Highway 169 N Ste 1200 Plymouth, MN 55441	Electronic Service	No	OFF_SL_21-565_Official Service List
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_21-565_Official Service List
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tim	Wulling	t.wulling@earthlink.net		1495 Raymond Ave. Saint Paul, MN 55108	Electronic Service	No	OFF_SL_21-565_Official Service List
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_21-565_Official Service List
Grant	Zimmerman	GZIMMERMAN@AMPAME RICAS.COM	Amp Americas	811 W Evergreen Ave Ste 201 Chicago, IL 60642	Electronic Service	No	OFF_SL_21-565_Official Service List
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-565_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	ross.abbey@us-solar.com	United States Solar Corp.	100 North 6th St Ste 222C Minneapolis, MN 55403	Electronic Service	No	OFF_SL_23-117_Official List
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_23-117_Official List
Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource	15669 WATERLOO CIR TRUCKEE, CA 96161	Electronic Service	No	OFF_SL_23-117_Official 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_23-117_Official List
Jose	Alvillar	jose@unidos-mn.org	Unidos-MN	N/A	Electronic Service	No	OFF_SL_23-117_Official List
Gary	Ambach	Gambach@slipstreaminc.org	Slipstream, Inc.	8973 SW Village Loop Chanhassen, MN 55317	Electronic Service	No	OFF_SL_23-117_Official 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_23-117_Official List
Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato	P.O. Box 3368 Mankato, MN 560023368	Electronic Service	No	OFF_SL_23-117_Official List
Mara	Ascheman	mara.k.ascheman@xcenergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-117_Official List
James H.	Barkley	james.barkley@bakerbotts.com	Baker Botts	910 Louisiana Street Houston, TX 77002-4995	Electronic Service	No	OFF_SL_23-117_Official List
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Randall	Beck	RBeck3@wm.com	Waste Management Renewable Energy, L.L.C.	1021 Main St Houston, TX 77002	Electronic Service	No	OFF_SL_23-117_Official List
David	Bender	dbender@earthjustice.org	Earthjustice	1001 G Street NW Suite 1000 Washington, DC 20001	Electronic Service	No	OFF_SL_23-117_Official List
Alicia	Berger	Alicia.E.Berger@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-117_Official List
Tracy	Bertram	tbertram@ci.becker.mn.us		12060 Sherburne Ave Becker City Hall Becker, MN 55308-4694	Electronic Service	No	OFF_SL_23-117_Official List
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Jessica	Beyer	jbeyer@greatermankato.com	Greater Mankato Growth	1961 Premier Dr Ste 100 Mankato, MN 56001	Electronic Service	No	OFF_SL_23-117_Official List
Mike	Boughner	Michael.I.boughner@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-117_Official List
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_23-117_Official List
Jocelyn	Bremer	jocelyn.bremer@minneapolismn.gov	City of Minneapolis	350 S Fifth St Ste 210 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_23-117_Official List
Tim	Brinkman	tim.brinkman@gvtel.net	Garden Valley Telephone Company - Coop	206 Vance Ave S PO Box 259 Erskine, MN 56535	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.	180 South Clinton Avenue Rochester, NY 14646	Electronic Service	No	OFF_SL_23-117_Official List
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	No	OFF_SL_23-117_Official List
Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy	10 2nd St NE Ste. 400 Minneapolis, MN 55413	Electronic Service	No	OFF_SL_23-117_Official List
Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings	600 N. Robert St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org		Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_23-117_Official List
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_23-117_Official List
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_23-117_Official List
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_23-117_Official List
Sheri	Comer	Sheri.comer@ftr.com	Frontier Communications Corporation	1500 MacCorkle Ave SE Charleston, WV 25396	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_23-117_Official List
Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350	729 6th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_23-117_Official List
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_23-117_Official List
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 St. Paul, MN 55104	Electronic Service	No	OFF_SL_23-117_Official List
Seth	DeMerritt	Seth.DeMerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-117_Official 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, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Ste 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
Scott F	Dunbar	sdunbar@keyesfox.com	Keyes & Fox LLP	1580 Lincoln St Ste 880 Denver, CO 80203	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_23-117_Official 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_23-117_Official List
Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International	5600 N Highway 169 Minneapolis, MN 55428-3096	Electronic Service	No	OFF_SL_23-117_Official List
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_23-117_Official List
Amy	Fredregill	afredregill@environmental-initiative.org	Environmental Initiative, MN Sustainable Growth Coalition	211 First St N Ste 250 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-117_Official List
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_23-117_Official List
BEAU	GRIFFEY	bgriffey@id8energy.com	iD8 Energy Group, LLC	1799 County Rd 90 N Maple Plain, MN 55395	Electronic Service	No	OFF_SL_23-117_Official List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_23-117_Official List
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Debbie	Goettel	Debbie.Goettel@hennepin.us	Partnership on Waste and Energy	2785 White Bear Ave N Ste 350 Maplewood, MN 55109	Electronic Service	No	OFF_SL_23-117_Official List
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_23-117_Official List
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-117_Official List
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_23-117_Official List
Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.	570 Colonial Park Drive Suite 305 Roswell, GA 30075-3770	Electronic Service	No	OFF_SL_23-117_Official List
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_23-117_Official List
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official 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	No	OFF_SL_23-117_Official List
Joylyn C	Hoffman Malueg	Joylyn.hoffmanmalueg@weceenergygroup.com	Minnesota Energy Resources	2685 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_23-117_Official List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_23-117_Official List
John	Jaimez	john.jaimez@hennepin.us	Hennepin County Public Works	Environment & Energy Department 701 4th Ave S Minneapolis, MN 55415	Electronic Service	No	OFF_SL_23-117_Official List
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_23-117_Official List
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN	2801 21st Ave S Ste 220 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_23-117_Official List
David	Kailbourne	EDK@REVLNG.COM	REV LNG, LLC	1002 Empson Rd Ulysses, PA 16948	Electronic Service	No	OFF_SL_23-117_Official List
D	Kalmon	dkalmon@mwm.org	Mississippi Watershed Management Organization	2522 Marshall St NE Minneapolis, MN 55418-3329	Electronic Service	No	OFF_SL_23-117_Official List
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Frank	Kohlasch	frank.kohlasch@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N. St. Paul, MN 55155	Electronic Service	No	OFF_SL_23-117_Official List
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official 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_23-117_Official List
Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce	401 N Robert Street Suite 150 St Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_23-117_Official List
Andrew	Larson	andrew.m.larson@state.mn.us	Public Utilities Commission	121 7th Place E., #350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-117_Official List
Robert	Lems	administration@dm-tcgs.com	DMT Clear Gas Solutions	19125 SW 125th Ct Tualatin, OR 97062	Electronic Service	No	OFF_SL_23-117_Official List
Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello	505 Walnut St Ste 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_23-117_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-117_Official List
Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_23-117_Official List
Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_23-117_Official List
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