



Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
www.minnesotaenergyresources.com

August 8, 2025

VIA ELECTRONIC FILING

Mike Bull
Interim Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

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

Docket No. G999/CI-21-565

Reply Comments of Minnesota Energy Resources Corporation

Dear Mr. Bull:

On May 5, 2025, the Minnesota Public Utilities Commission (“Commission”) issued a Notice of Comment Period (the “Notice”) requesting comments be filed in the above-referenced docket surrounding the issue of what action(s), if any, should the Commission take to modify existing gas line extension policies (“LEPs”) for rate regulated gas utilities. On July 8, 2025, several parties submitted comments in response to the Notice. Minnesota Energy Resources Corporation (“MERC” or the “Company”) submits these Reply Comments in response to those July 8, 2025 comments.

The Company noticed recurring themes or positions within the parties’ comments filed on July 8, 2025, to which these Reply Comments respond to. MERC continues to support no modifications to how gas utilities calculate footage allowances and other costs related to gas main and service line extensions.

LEP is built upon the principle of “ensur[ing] that extending service to new customers benefits existing customers through spreading fixed costs among a larger customer base. Line extension policies were designed to help ensure that this beneficial cost-spreading effect occurs without cross-subsidies from existing customers to new customers while allowing the utility to provide equitable nondiscriminatory service with a level of investment commensurate with the incremental revenues from the new

customers. Therefore, the removal or reduction of line extension allowances may lead to a shift of benefits from new customers to the existing customer base and, paradoxically, government-imposed inequitable service, access to energy and the potential for economic growth.”¹

Under MERC’s current LEP, when a new customer is added to the distribution system, existing customers receive a benefit by having a larger customer base and consumption level over which to spread existing costs. Thus, the parties involved should equitably share in the extension costs of a new customer. Mindful of the Commission’s concerns that existing customers should not subsidize growth, the LEP only allows for a sharing of the burden if existing customers benefit from the extension. If the new line extension is not a net revenue generator over the course of the line’s life, the Company recovers a portion of the cost of the extension from the new customer through a contribution in aid of construction (“CIAC”).

While MERC’s current LEP provides for a 75-foot service line allowance to new residential customers, it’s important to note that the new residential customer is not getting the 75 feet of service line for “free”, but rather, the base rates being charged to the new customer recover the costs of the extension over several years. Additionally, potential upward pressure on the base rates being charged to both the new customer and existing customers is stagnated due to the fixed costs of serving customers now being recovered by a larger customer population.

As stated above, MERC does not believe modifications to its LEPs are warranted. Service line extensions directly follows the utility’s obligation to serve. Under Minnesota law, natural gas utilities have an obligation to provide continuous, safe, reliable, and affordable service to all customers and LEPs permit natural gas utilities the ability to fulfill that obligation.

Line Extension Policy does not run counter to Minnesota Legislation

Contrary to various July 8, 2025 comments filed by parties in the above-referenced docket, LEP does not run counter to current Minnesota Legislation surrounding goals for reduction of greenhouse gas (“GHG”) emissions. A recent study² published July 1, 2025 analyzing potential pathways to a clean energy future in another Midwest state, Illinois (the “2025 Illinois Study”), shows that a dual-fuel and renewable natural gas

¹ McDermott, K.A. and C.R. Peterson, (2024). *The Current State of Natural Gas Utility Line Extension Policies*, Prepared for the American Gas Association, Washington, DC. https://icc.illinois.gov/api/web-management/documents/downloads/public/future-of-gas/Analysis%20of%20the%20Future%20of%20Gas%20in%20Illinois_Final.pdf.

² Peterson, C.R., K.A. McDermott, and R.C. Hemphill, (2025). *Analysis of Potential Pathways to a Clean Energy Future in Illinois*, Prepared for the American Gas Association, Washington, DC.

(“dual-fuel/RNG”) approach³ is not only the lowest cost approach but also significantly reduces emissions. The dual-fuel/RNG approach would cost \$340 billion⁴, as compared to \$1.2 trillion for a 100% clean energy (and full electrification) approach, and the dual-fuel/RNG approach would remove approximately 60% of emissions relative to the 100% clean energy approach. Additionally, the study showed the dual-fuel/RNG approach to be the lowest Cost per Ton CO² reduction at \$455/ton versus the 100% clean energy approach costing \$1,855/ton per Ton CO² reduction. Therefore natural gas can, and should, play an important role in emissions reductions and presents a cost effective approach.

MERC concurs with Laborers’ International Union of North America Minnesota and North Dakota’s (“LIUNA’s”) July 8, 2025 comments when they state that natural gas provides an effective compliment to electricity by meeting peak cold-weather energy demands that will be challenging for electric utilities to meet while addressing load growth and achieving compliance with Minnesota’s GHG emission goals.⁵ It is highly accurate to assume that increased electrification drives growth away from a summer-peak demand to a winter-peak demand for the electric system. The 2025 Illinois Study confirmed this shift of the electric system to a winter-peak demand under the 100% clean energy approach and is a large reason why the 100% clean energy approach is so costly, as no-emissions resources are needed to meet that winter-peak demand.⁶ Yet, the use of a dual-fuel/RNG approach mitigates the effects on the electric system of moving to a winter-peak on the Illinois electric system. The 2025 Illinois Study showed a 530 percent increase in winter-peak demand on the electric system under a 100% clean energy approach, which is over four times the size of the electric system’s summer-peak demand. Using a dual-fuel approach, whereby natural gas backup systems provide heat on the coldest days to customers in Minnesota is not only the most reasonable approach, but the most cost effective approach – all while reducing emissions and contributing towards Minnesota’s GHG reduction goals. LEP will play a vital role in that cost effective, dual-fuel future for Minnesota, and changes to LEP at this critical juncture would have unwarranted, detrimental impacts.

The 2025 Illinois Study isn’t the only study that concludes a dual-fuel approach is the most cost effective approach. As Xcel Energy and LIUNA referenced in their July 8, 2025 Comments, and MERC reiterates, the stakeholder process and consensus recommendations report (the “G21 Report”) produced by Great Plains Institute (“GPI”) and Center for Energy and Environment (“CEE”) recognizes that the most cost-effective

³ Defined in the study as Rate Cap-Moderate RNG, whereby progress is maximized toward 2050 clean energy targets with moderate use of Renewable Natural Gas (“RNG”) subject to a 500 percent rate increase cap by 2050 on the total delivered price of natural gas.

⁴ Total costs are inclusive of: 1) total costs for maintaining the natural gas system through 2050, 2) total costs associated with decarbonization, including customer out of pocket costs and total rebate costs, and 3) total costs associated with the electric infrastructure system through 2050. Note that the \$1.2 trillion cost for a 100% clean energy approach does not include the cost of potentially stranded natural gas infrastructure costs.

⁵ LIUNA July 8, 2025 Comments filed in the above-referenced docket, page 3.

⁶ Peterson, C.R., K.A. McDermott, and R.C. Hemphill, (2025). *Analysis of Potential Pathways to a Clean Energy Future in Illinois*, Prepared for the American Gas Association, Washington, DC.

and reliable way to reduce emissions from the natural gas system in support of the state's net-zero greenhouse gas goal is weatherization with electric space heating adoption, while retaining gas service for back-up heat during cold temperatures.⁷

Additionally, MERC notes that there are emissions reductions frameworks currently in place that allow natural gas utilities to contribute to Minnesota's GHG emission reductions goals: Energy Conservation and Optimization ("ECO"), Natural Gas Innovation Act ("NGIA"), and Gas Integrated Resource Plans ("Gas IRPs").

MERC's Line Extension Policy provides a fair, equitable, and accurate approach to connecting new customers to the natural gas system

As stated above, MERC LEP only allows a new extension if existing customers benefit from the extension. If the new line extension is not a net revenue generator over the course of the line's life, the Company recovers the unfeasible portion of the cost of the extension from the new customer through a CIAC, which ensures that existing customers are not subsidizing the new extension. Additionally, adding more customers to the natural gas distribution system through line extensions spreads those costs across more customers, reducing costs.

In comments filed by various parties on July 8, 2025, there was recommendations to phase out and/or eliminate Line Extension Allowances ("LEAs"), and to require new customers to pay for the costs of the extension. MERC continues to advocate that no changes be made to current LEP, including LEAs. In the LEP Study filed by MERC in Docket No. G011/GR-22-502⁸, the Company has shown that changes to LEP would cause inequitable treatment between new and existing customers, not only from a cost perspective, but also from a benefits perspective.

While previously mentioned above, it requires repeating: LEAs are not providing a service line to the new customer for "free". Rather, a LEA is a tool within the construct of the LEP that helps to provide new customers with fair access and an economical means to connecting to the natural gas system. The base rates being charged to the new customer recovers the costs of the extension and does so in a manner over several years. The calculations conducted within the Customer Extension Model ("CEM") provide the basis for showing that the net present value ("NPV") of the revenues received from the new customer are recovering the cost of the new extension. And, again, potential upward pressure on the base rates being charged to both the new

⁷ Great Plains Institute, Center for Energy and Environment, 2021. *Decarbonizing Minnesota's Natural Gas End-Uses*. <https://e21initiative.org/wp-content/uploads/2021/07/Decarbonizing-NG-End-Uses-Stakeholder-Process-Summary.pdf>.

⁸ Docket No. G011/GR-22-504, *In the Matter of the Application of Minnesota Energy Resources Corporation for Authority to Increase Natural Gas Rates in Minnesota*, Compliance Filing (November 14, 2024).

customer and existing customers is stagnated due to the fixed costs of serving customers now being recovered by a larger customer population.

As pointed out by MERC and various parties in July 8, 2025 Comments, removal of the LEAs would place undue burden upon and create cost barriers for new customers. As detailed by Minnesota local governments⁹, “building development costs continue to increase on an already tight housing market”.¹⁰ Further detailed by CEE, Housing First Minnesota, Minnesota local governments, and CenterPoint Energy in their July 8, 2025 Comments, eliminating LEAs would increase cost of a new home and home affordability. Additionally, changes to LEP will cause uncertainty and further restrict Minnesotans’ access to attainable housing.

In their July 8, 2025 Comments, CEE provided a new home energy cost analysis, where they analyzed energy costs for eight single-family home types, differing in building geometry, climate zone, gas and electric utility service territory, and energy use. The analysis compared a business-as-usual approach for gas usage and annual energy costs for these eight different home types in four different service areas, to a fully electrified approach. CEE commented that while eliminating LEA could incentivize electrification, their analysis shows in all housing situations where MERC is the natural gas service provider, electric service will be more expensive (looking at the first year of usage/operation, and not including up-front installation and/or equipment costs). CEE also noted, and MERC concurs based upon the results of the Company’s 2023 customer survey, that customers view gas service and/or gas heated homes as being a more economical option. CEE also noted their concern that in today’s conditions with high installation costs for cold weather heat pumps (as compared to high-efficiency gas furnaces), eliminating LEAs “will not meaningfully move the market towards electrification, and risks simply increasing costs to new customers without tangible benefit.”¹¹

CEE’s analysis showing that electrification¹² will be more costly for customers¹² confirms the results shown in the 2025 Illinois Study¹³. The analysis conducted in the 2025 Illinois Study found that under the 100% clean energy (and fully electrified) approach, that customer rates increase 14 percent annually, for a total increase of 2112 percent by 2050. This large rate increase is caused by the need for additional generation resources and reinforcement of the electric transmission and distribution grid. And this 2112 percent rate increase does not include recovery of stranded natural gas infrastructure costs. The 2025 Illinois Study further showed that under the dual-

⁹ St. Louis Park, Eden Prairie, Richfield, Edina, Hopkins, Bloomington, and City of Saint Paul.

¹⁰ Minnesota Local Governments July 8, 2025 Comments filed in the above-referenced docket, page 2.

¹¹ CEE July 8, 2025 Comments filed in the above-referenced docket, pages 11-15.

¹² CEE’s analysis showed that electric costs would be higher in a fully electrified scenario for all housing situations where MERC is the natural gas service provider. CEE’s analysis showed one natural gas service territory where energy costs would have relative cost parity under a fully electrified scenario, and CEE attributes that relative cost parity, in part, to Xcel Energy’s new electric space heating rate design that went into effect June 1, 2025.

¹³ *Id.*

fuel/RNG approach, customer rates increase by approximately 6.7 percent annually, for a total increase of 506 percent by 2050. While a 500 percent increase is not ideal, the analysis shows that a dual-fuel approach is a lower cost option for customers than a fully electrified approach.

LEP and LEAs create an equitable approach to extending service across a diverse customer base. As noted by Xcel Energy in their July 8, 2025 comments, rural customers will be impacted greater by changes in LEP, as their extensions are longer versus customers who are served in urban areas and have shorter extensions. Requiring a new customer to pay the entire cost of a service extension up front would create a cost barrier for rural customers to convert from propane to gas, which is contrary to GHG reduction goals.¹⁴ MERC also notes that this type of scenario could disproportionately affect MERC customers, as MERC has a very diverse service territory compared to other natural gas utilities in Minnesota, with much of MERC's service territory being rural. Lastly, MERC's customers confirmed in a 2023 survey that if MERC had been unable to extend natural gas service to them, they would have used propane as their energy source instead.

In its July 8, 2025 Comments, Rewiring America stated that natural gas service should not be expanded into rural, low-density areas because to do so is not cost efficient and adds long-term burden to all customers. MERC reiterates that its LEP only allows a new extension, whether urban or rural, if existing customers benefit from the extension. If the new line extension is not a net revenue generator over the course of the line's life, the Company recovers the unfeasible portion of the cost of the extension from the new customer through a CIAC, which ensures that existing customers are not subsidizing the new extension. Additionally, MERC notes that its current LEP dictates that residential customers must pay for the incremental cost of footage above and beyond a 75-foot service allowance. Therefore rural customers are paying for costs of new line extensions. Lastly, while Rewiring America's recommendation focuses on costs, MERC notes that there are significant qualitative benefits to extending service to new customers, particularly rural customers, which the Company discusses further below.

MERC would also caution that, pursuant to its obligation to serve to serve all customers, the Company cannot limit supply only to the "most profitable" customers. As a result, regulators generally use "postage stamp" pricing at average cost to support community-wide service by grouping similar customers together in rate classes – such as Residential customers.¹⁵

¹⁴ Xcel Energy July 8, 2025 Comments filed in the above-referenced docket, page 7.

¹⁵ McDermott, K.A. and C.R. Peterson, (2024). *The Current State of Natural Gas Utility Line Extension Policies*, Prepared for the American Gas Association, Washington, DC. https://icc.illinois.gov/api/web-management/documents/downloads/public/future-of-gas/Analysis%20of%20the%20Future%20of%20Gas%20in%20Illinois_Final.pdf.

Lessons from proceedings in other States

Various parties filed comments on July 8, 2025 making references to Commissions in other states that have implemented phase outs or elimination of LEAs, and using this action as the impetus for this Commission to do the same. These actions by other Commissions has only occurred recently, over the past five years, and has only occurred in nine states, or 18 percent of the U.S.; and these nine states either have in place or are currently reviewing natural gas resource planning and/or LEPs either via Commission Order, Rate Case Settlements or Legislation. Therefore MERC continues to argue whether adequate time that has passed in other states to truly determine the effectiveness of LEP modifications and/or see if there are any clear lessons learned. The Company also continues to have concern about the impact changes to LEPs could have upon low-income customers, as well as businesses and industry in Minnesota.

MERC is in alignment with CenterPoint Energy's comments filed July 8, 2025 in that the Commission would be better served in looking to neighboring states in the Midwest in regard to LEP and LEAs. Additionally, these neighboring states have similar temperature profiles. Lastly, instead of placing merit on the actions of other Commissions located outside of the Midwest, MERC would recommend that the Commission take into consideration the 2025 Illinois Study that the Company has made reference to in these comments. This study provides excellent insight to potential pathways for a Midwest state to achieve cost effective decarbonization goals.

The Commission's review of Line Extension Policies should not encompass ending the extension of new service to customers

Certain parties filed comments on July 8, 2025 stating that the Commission end extending natural gas service to new customers, and in some instances, recommended ending expansion of existing service.¹⁶ MERC disagrees with this recommendation and believes this issue is outside the scope of the Notice. That being said, MERC provides the following comments on the subject of ending extension of natural gas service.

¹⁶ American Lung Association July 8, 2025 Comments filed in the above-referenced docket, page 3: "efforts to maintain or expand gas infrastructure run counter to this framework...Instead Minnesota should...prioritiz[e] zero-emission technologies that protect lungs and lives of all Minnesotans."

MN350 Action July 8, 2025 Comments filed in the above-referenced docket, pages 3-4: "Instead of continuing to expand, utilities should begin responsibly winding down gas infrastructure....Rather than building more gas lines, Minnesota should invest in clean energy solutions...MN350 Action urges the [Commission] to reject proposals that expand pipeline extension allowances."

Rewiring America July 8, 2025 Comments filed in the above-referenced docket, page 9: "...new gas infrastructure in low-density, currently unserved areas only adds an unnecessary long-term financial burden to all customers. Instead...Minnesota should redirect those investments toward energy efficiency and electrification efforts...The economic reasons are clear for not extending the gas distribution system into areas that are not currently primarily served by one or more of the gas [utilities]."

Under Minnesota law, natural gas utilities have an obligation to provide continuous, safe, reliable, and affordable service to all customers and LEPs permit natural gas utilities the ability to fulfill that obligation. As explained by MERC in its July 8, 2025 comments, Minn. Stat. § 216B.1638, Recovery of Natural Gas Extension Project Costs, allows a public utility to petition the Commission outside of general rate case for a rider to recover the revenue deficiency from a natural gas extension project to serve an underserved or inadequately serve area.

Extending natural gas service to new customers helps to ensure customers receive safe, affordable and reliable service. When evaluating LEP, LEAs, and natural gas extensions, it is important to remember that evaluations have both qualitative and quantitative dimensions. As stated by parties in their July 8, 2025 Comments, natural gas service provides both new and existing customers access to the benefits of gas affordability programs (“GAP”), Energy Conservation and Optimization (“ECO”) programs, and Cold Weather Rule (“CWR”) protections. Additionally, customers receiving natural gas service receive the assistance and service of the Consumer Affairs Office (“CAO”) at the Commission. Lastly, one cannot ignore the fact that if the Commission were to end extending natural gas service, it would effectively be eliminating customer choice. These are all qualitative factors that cannot be quantified by a number or assigned a cost value, but yet should still be given similar weight in the evaluation.

Again, MERC views the issue of ending gas extension as being outside of the scope of the Notice. MERC also concurs with LIUNA’s July 8, 2025 comments: it is important to note that, in crafting the only policy specific to decarbonization of natural gas utilities, the Minnesota Legislature prioritized reduction of total throughput and not on limitations on the size of expansion of distribution infrastructure [Emphasis added]. Lastly, MERC notes that the Minnesota Center for Environmental Advocacy (“MCEA”) and Fresh Energy, and the Minnesota Department of Commerce, Division of Energy Resources (the “Department”) specifically stated in their July 8, 2025 Comments that they were not advocating that natural gas utilities be restricted from extending new service or expanding existing service.

The Citizens Utility Board of Minnesota’s (“CUB’s”) request that utilities file clear information on their Line Extension Policies

In their July 8, 2025 Comments, CUB requested that each utility file in Reply Comments a clear, plain-language breakdown of its LEP, and provided a list of minimum information for the utilities to include. CUB stated this information would assist future discussions and provide public transparency. MERC notes that as part of the stakeholder discussions for the LEP Study, the Company conducted a full review of the CEM, the inputs into the CEM, and how the model works, i.e. computation of whether a project is self-supporting and/or requires a CIAC. Additionally, MERC’s Tariff Sheets

9.00 – 9.08, which are public, contains the information and details on the Company's LEP. That being said, MERC has provided the information requested by CUB in Attachment A to these Reply Comments.

CEE's recommendation that the Commission establish new criteria for considering line extension tariffs across all rate-regulated utilities

On June 4, 1991, in Docket No. G-999/CI-90-563, the Commission issued an investigation into gas service extension. The Commission found a number of important policy issues with regard to gas service extension had been raised, and created a study group to look into those issues. From this investigation, on March 31, 1995, the Commission issued its Order Terminating Investigation and Closing Docket in Docket No. G-999/CI-90-563 (the "March 31, 1995 Order"), which directed each gas utility to address six questions in future rate cases relating to each gas utility's extension rules and policies, as well as addressing three specific concerns about the impact of service extension-related additions to each gas utility's rate base.

In their July 8, 2025 Comments, CEE recommended that the Commission update the March 31, 1995 Order by establishing new criteria for considering line extension tariffs across all rate-regulated utilities; these new criteria would replace the six questions and three concerns established in the March 31, 1995 Order. CEE recommended that the Commission require rate-regulated natural gas utilities filing new or modified line extension tariffs demonstrate that the proposed tariff has considered the new criteria. The Commission would then review and approve each utility's new or modified line extension tariffs in utility-specific proceedings based on the new criteria. CEE's proposed criteria are as follows:

1. How does the tariff support and serve Minnesota's GHG emission reduction goals?
2. How does the tariff consider actions taken by the Commission and the Department in other proceedings, including but not limited to Gas IRPs, NGIA Plans, ECO Plans, and other utility pilots, programs, and rate design offerings?
3. How does the tariff consider affordability and ratepayer protections related to both existing and new customers?
4. How does the tariff consider the differences in serving different customer types, such as whether service is being extended to new structures or existing structures without gas service?
5. How does the tariff consider the viability and affordability of alternative heating methods?

MERC does not have concerns with continuing to respond to the Commission's six questions and three concerns in future rate cases regarding the Company's LEP and associated tariffs. And at this point in time, MERC does not have concerns on CEE's proposed five replacement questions. It is the Company's understanding that these questions would replace the Commission's current six questions and three concerns,

and the new questions would be answered in the context of a utility-specific proceeding, initiated by the utility, whereby the utility is petitioning for a new or modified line extension tariff.

CEE's recommendation that the Commission require natural gas utilities that offer a footage allowance to file a comprehensive single-family new construction ECO program

In their July 8, 2025 Comments, CEE recommended that the Commission require natural gas utilities that offer a footage allowance as part of their LEP to file a comprehensive single-family new construction ECO program with the Department by June 1, 2026, that includes the following components:

1. Require homes to achieve minimum energy savings of 10 percent better than Minnesota's residential building code requirements.
2. Require installation of an air source heat pump in lieu of a central air conditioner to be eligible for the program.
3. Do not require installation of natural gas appliances to be eligible for the program and do not make rebate levels contingent on installation of natural gas appliances.
4. Provide a bonus rebate for homes with a UA threshold that is better than Minnesota's residential building code requirements

MERC is not supportive of CEE's recommendation as written. While MERC would be open to some components of the proposed single-family new construction ECO program, other components of the new program effectively remove customer choice, which MERC does not align with. The Company would like to take additional time to review CEE's recommendation, and is also interested in reviewing other parties' viewpoints on CEE's recommendation in their August 8, 2025 Reply Comments.

LIUNA's recommendation that the threshold for approval of line extensions be changed to a threshold that the utility's overall extension program be cost-neutral.

LIUNA filed comments on July 8, 2025 recommending that, if the Commission were inclined to make changes to LEP, that "the threshold for approval of line extensions be changed from [the] current requirement that *each line extension* must be at least cost-neutral to customers to a requirement that a utility's *overall extension program* be cost-neutral." MERC does not oppose this recommendation. LIUNA's recommendation is in alignment with how utilities' current base rates are set, which is done on a total company basis. Utilities do not have the right to request increases in rates because some individual costs have changed – this is called prohibition on single issue

ratemaking.¹⁷ Rather, it is the utility's overall cost level compared to the utility's overall revenue level which sets the net income for a utility¹⁸; i.e. the utility's revenue requirement calculation.

The Office of the Attorney General—Residential Utilities Division's ("OAG's") recommendation that the Commission periodically revisit line and main extension allowances

In their July 8, 2025 Comments, OAG recommended that the Commission should periodically revisit the utilities' line- and main-extension allowances to ensure they are supported by reasonable assumptions and whether it remains reasonable for utilities to offer extension allowances. As noted above, the Commission's March 31, 1995 Order directs each gas utility to address six questions in future rate cases relating to each gas utility's extension rules and policies, as well as addressing three specific concerns about the impact of service extension-related additions to each gas utility's rate base. MERC has provided this information to the Commission in each subsequent rate case filing. The Company feels that OAG's recommendation is duplicative of actions the Commission already conducts whereby it reviews each "gas utility's extension rules and policies" as well as "the impact of service extension-related additions to each gas utility's rate base". The Commission conducts this review periodically when a gas utility files a rate case. While MERC does not have any objection over continuing to provide this information in future rate case proceedings, the Company views OAG's recommendation as duplicative and does not believe further action is warranted.

OAG's recommendation that the Commission allow customers to pay CIAC over one year and allow CIAC waivers for low-income customers

In their July 8, 2025 Comments, OAG expressed concern over changes to LEP impacting low-income customers. Specifically, OAG expressed concern regarding the impact of proposed decreases and/or elimination LEAs would have on low-income customers, and also expressed concern over the impact of proposals to require new

¹⁷ McDermott, K.A. and C.R. Peterson, (2024). *The Current State of Natural Gas Utility Line Extension Policies*, Prepared for the American Gas Association, Washington, DC. https://icc.illinois.gov/api/web-management/documents/downloads/public/future-of-gas/Analysis%20of%20the%20Future%20of%20Gas%20in%20Illinois_Final.pdf. See e.g., *Citizens Utility Board v. Illinois Commerce Commission* (1995); *Business and Professional People for the Public Interest v. Illinois Commerce Commission* (1991); *State ex rel. Utility Consumers Council of Missouri, Inc. v. Public Service Commission of Missouri* (1979); or *Pennsylvania Indus. Energy Coalition v. Pennsylvania Pub. Util. Comm'n* (1995). There are limited exceptions to the single-issue ratemaking prohibition related to items that are highly volatile.

¹⁸ *Id.*

customers to pay 100 percent of line extension costs, which would increase the CIAC assessed to low-income customers. MERC shares these concerns.

As expressed by MERC in the Company's July 8, 2025 Comments, the impact on low-income and vulnerable customers should be part of the discussion surrounding LEP. Low-income households often face greater energy insecurity and are more vulnerable to rising energy costs. Providing low-income customers with access to the natural gas system delivers large social benefits via access to CWR protections and GAP, as well as access to the economic fuel source of natural gas. Many times, low-income customers or customers in environmental justice areas are the last customers that have the ability to make the investments needed to change their fuel source and that circumstance would be exacerbated if LEP modifications are made.

In response to the burden that changes to LEAs and/or LEP could place on low-income customers, OAG proposed that the Commission could allow customers to pay CIAC over the course of their first year of service instead of the CIAC being required to be paid as a lump sum at the time of construction. The OAG also proposed that the Commission could allow the utilities' LEP to incorporate a waiver of CIAC for customers that show they lack the ability to pay. While MERC continues to recommend that no changes be made to LEAs or the Company's LEP, the Company believes these two proposals by OAG have merit in helping to reduce the potential cost burden for low-income customers to connect to a reliable, safe, cost effective energy system.

OAG recommendation that LEAs should be based on more reasonable assumptions

In their July 8, 2025 Comments, OAG stated that LEAs should be based upon more reasonable assumptions. OAG recommended that the Commission should require the utilities to file new tariffs that establish new LEAs or CEMs that do not include unreasonable assumptions about usage, cost, and payback periods, and that do not provide the utility with undue discretion to offer additional CIAC waivers. Specifically, OAG stated the following changes to assumptions:

1. New customer consumption will be lower than current average, and decline over life of asset. Utilities could use various sources for this: collect data on new customers, extrapolate based on state/region-wide trends, use historical experience from ECO, or use forecasts on declining usage,
2. Include meter costs, and actual costs of incremental footage should be charged, and should not be capped, and;

3. The Commission should determine an appropriate useful life period.^{19 20}

As shown by MERC in the LEP Study it completed and filed in Docket No. G011/GR-22-502, and as stated by MERC in its July 8, 2025 Comments in the above-referenced docket, the Company's LEA and LEP is a reasonable application to provide new service extensions to customers in its service territory. MERC largely discussed the topic of changing use per customer ("UPC") in the LEP Study at pages 10 through 20; MERC will not go through the motion of repeating those specifics in these Reply Comments, as the LEP Study is specifically referenced as a point of topic in the Notice for this docket.

Regarding meter costs, MERC notes that within the Company's LEP, specifically at Tariff Sheet No. 9.07, the Definitions section, part 3), it defines the gross plant investment that is to be included in the CEM and meters are included. Additionally, at Tariff Sheet No. 9.04, MERC states that the incremental footage cost is based upon actual costs. MERC's tariff specifies that the incremental cost is based upon annually renegotiated rates via a competitive bidding process, and that incremental cost per foot is capped at \$6.00. The Company would be open to OAG's recommendation of removal of the cap for incremental footage from MERC's Tariff Sheet 9.04. Given that the Company charges the actual cost for the incremental footage, the proposed change will not impact MERC's revenue requirement as the revenue from the application of the actual charges would be used to pay actual contractor costs. Additionally, removal of the cap would eliminate administrative filings to the Commission requesting the cap be updated when actual costs rise above the cap.²¹

In regard to useful life periods, MERC largely discussed the topic of changing useful life assumptions in the LEP Study at pages 8 through 10. The Company believes that its current useful life assumption used in its LEP and CEM is reasonable and mimics the useful life assumptions upon which current Commission-approved base rates are based upon. Using a different useful life assumption in the LEP would misalign cost causation and create bias between new and existing customers.

As stated above, both the G21 Report and the 2025 Illinois Study show that a dual-fuel approach is the most cost effective approach for the future of gas. Under this approach, gas distribution system assets will continue to remain in-service to ensure that Minnesotans stay warm on the coldest day of the year. Under a dual-fuel approach, there would be no need to change useful life assumptions: used and useful requires that utility assets are sized at any given time such that such assets will, or are expected

¹⁹ OAG July 8, 2025 Comments filed in the above-referenced docket, pages 25-32.

²⁰ MERC notes that MCEA and Fresh Energy July 8, 2025 Comments filed in the above-referenced docket, page 15-16, while not making a specific recommendation to the Commission, stated that believe assets installed today are not guaranteed to be used through their full useful life of 48 years.

²¹ MERC requested that the Commission increase the cap from \$5.00 per foot to \$6.00 per foot in Docket No. G011/M-22-55, and currently has a request before the Commission in Docket No. G011/M-25-288 to increase the cap from \$6.00 per foot to \$7.00 per foot.

to, provide service to customers.²² MERC agrees with the statement in the 2025 Illinois Study that even in the most aggressive scenarios, an electrification transformation will take decades. Yet, state Commissions and customers will demand that the remaining gas utility assets continue to operate in a safe and reliable manner and, for those customers who do not wish to electrify or cannot economically justify electrifying, delivered natural gas prices must remain reasonable.²³

Lastly, MERC wishes to clarify the OAG comment regarding MERC's tariff which may give the impression that the Company is allowed to decrease or waive customer CIACs as part of its LEP²⁴; this is incorrect. MERC does not decrease or waive customer CIACs. The only language regarding CIAC waiver is at MERC Tariff Sheet 9.05:

Once the Company waives any contribution by new customers for main and service extension costs, the Company cannot at any time recover these costs from existing ratepayers.

This language does not allow MERC to waive customer CIAC. This language provides protection to existing ratepayers and clarifies that if a CEM was improperly computed such that it incorrectly assessed zero customer CIAC, after discovering the error, the Company is not allowed to recover those waived CIAC costs from existing ratepayers (via increased base rates). Lastly, the Company notes the very last sentence of MERC Tariff Sheet 9.05, which makes the situation very clear: If a CIAC is required, it will be based on the results of the Customer Extension Model.

MERC's LEP Study provides beneficial information and insight for the Commission to review in the context of the Future of Gas docket

Both MCEA and Fresh Energy, and OAG at their July 8, 2025 Comments stated that MERC's LEP Study was either flawed and/or does not provide useable or useful information. Specific areas of the LEP Study that OAG stated at page 39 of their July 8, 2025 comments were flawed: costs shown in the study are outdated, and the changes to MERC's LEP that the Company presented via the scenario analyses in the LEP Study were done in isolation and didn't incorporate reduced UPC. Specific areas of the LEP Study that MCEA and Fresh Energy stated in their July 8, 2025 comments were flawed: that changes to MERC's LEP that the Company presented via the scenario

²² Hoecker, J. (1987). *Used and Useful: Autopsy of a Ratemaking Policy*, Energy Law Journal, 8(2), 303-335, and Lesser, J.A. (2002). *The Used and Useful Test: Implications for a Restructured Electric Industry*, Energy Law Journal, 23(2), 349-381.

²³ *Id.*

²⁴ OAG July 8, 2025 Comments filed in the above-referenced docket, at page 33, footnote 109: *MERC does not have free footage allowance for main extensions but can decrease or not assess CIAC according to the outcome of their Customer Extension Model. See MERC Tariff and Rate Book, Extension of Natural Gas Service, 3rd Revised Sheet No. 9.05.*

analyses in the LEP Study were minimized; the changes were not drastic enough when looking at useful life assumptions, changing UPC, and incorporation of a social cost of carbon.

MERC disagrees. Any study can have criticisms placed upon it, but the overarching premise and outcomes portrayed by MERC's LEP Study are creditable and are indicative of customers paying their allocated costs. MERC would also state that if the Company had conducted scenario modeling in its LEP Study that incorporated drastic changes to LEP and/or assumptions, then yes, it would follow suit that those scenarios would have most likely produced drastic results – *but that does not mean it is reasonable to conduct drastic modeling changes*. MERC provided six different scenario analyses within the LEP Study and based those scenarios upon data driven, reasonable and/or moderated changes. The LEP study conducted by MERC utilized the data and information that was available and accessible to the Company at the time the study was created; additionally, data utilized within the LEP Study was data that stakeholders had already been familiarized with during the context of MERC's 2023 Rate Case. Lastly, MERC viewed that it would be more helpful to readers if the scenario analyses conducted in the LEP Study were done in isolation, which shows the impact each individual change would have on a customer.

As stated by MERC in its July 8, 2025 Comments, while some of the issues addressed in the LEP Study were specific to MERC and its 2023 Rate Case, other issues discussed in the LEP Study provide beneficial information to the Commission and parties for consideration in this docket. MERC's LEP Study provides insight to specific examples of modifications to its LEPs and the impacts of those changes, although MERC continues to caution that other natural gas utilities' LEPs are not identical to MERC's and therefore LEP modifications can and will have differing impacts on each natural gas utility.

MCEA and Fresh Energy's recommendation that the Commission revisit New Area Surcharge ("NAS") policy in future discussions in this docket.

MCEA and Fresh Energy filed comments on July 8, 2025 recommending that the Commission revisit NAS policy in future discussions in this docket. An NAS is permissible under Minn. Stat. § 216B.1638, Recovery of Natural Gas Extension Project Costs, which was signed into law on June 13, 2015. Minn. Stat. § 216B.1638 allows an NAS, which is designed to permit a natural gas utility like MERC to extend service into a new area it would be uneconomic to serve at tariffed rates, by permitting the Company to collect a surcharge in addition to the tariffed rate. This allows natural gas utilities to make natural gas available to communities previously not served by a natural gas utility without imposing the cost of expansion on existing ratepayers.

As stated above, MERC views the topic of ending natural gas expansion, which would include NAS, as being outside of the scope of the Notice. Additionally, MERC has

expressed concerns above on how changes to LEP and LEAs could have a detrimental impact to rural customers; further potential detrimental impact to rural customers via NAS policy changes is certainly not warranted. Lastly, NAS is built into State Statute and would require a Legislative change in order to conduct modifications upon it.

Conclusion


Gas line extensions and gas line extension policy plays a pivotal role in natural gas utilities' ability to continue investing in their distribution systems, which is essential as utilities continue to prudently plan their systems to keep customers safe, while making sure they have the heat needed during the coldest Minnesota winter evenings and that commercial customers have the energy they need to operate their businesses and employ Minnesotans.

MERC emphasizes that MN Legislation contains GHG reduction goals – not mandates. While reviewing LEPs, modifications to LEPs should not be viewed as the silver bullet to achieving net zero emissions. As stated within the G21 Report at recommendation 11, near term, it is unlikely consumers will switch to relatively new or novel technology, and electrification with gas backup will require consumers to keep and maintain their existing gas systems. Gas line extensions and allowances will help customers achieve this potential future state of electrification with gas backup.

The July 8, 2025 Comments filed by various parties, these August 8, 2025 Reply Comments, as well as an outside report²⁵, continue to show that the removal or reduction of LEAs, and/or changes to LEPs can shift benefits away from new customers and onto the existing customer base, which in turn, can create government-imposed inequitable service, inequitable access to energy and inequitable potential for economic growth. Gas line extensions and allowances should not be modified, as they provide both social and economic benefits to customers, businesses and communities throughout the state of Minnesota.

DATED: August 8, 2025

Respectfully submitted,



Joylyn Hoffman Malueg
Senior Project Specialist
Minnesota Energy Resources Corporation

²⁵ McDermott, K.A. and C.R. Peterson, (2024). *The Current State of Natural Gas Utility Line Extension Policies*, Prepared for the American Gas Association, Washington, DC. https://icc.illinois.gov/api/web-management/documents/downloads/public/future-of-gas/Analysis%20of%20the%20Future%20of%20Gas%20in%20Illinois_Final.pdf.

Mr. Mike Bull
August 8, 2025
Page 2

cc: Service List

MERC's Response to CUB's request for information on its Line Extension Policy

- 1) Free²⁶-footage allowance: 75-foot allowance service line applicable to residential customers only. Commercial customers do not receive a service line allowance.²⁷
- 2) An overview of the step-by-step process used to determine required customer contribution amount, if any, when:
 - a. A customer's request for service includes an extension of service and/or main line within the free-footage allowance.
MERC notes that this situation applies to residential customers only, as the footage allowance applies to residential customers only.

When a residential customer requests a service-line only (i.e. no main extension is required) within 75 feet, no customer contribution (also referred to as contribution in aid of construction, or CIAC) is required.²⁸ No CIAC is required because service lines of 75 feet or less are self-supporting, meaning the revenues gained from a new residential customer with a 75-foot service line recover the costs of the extension over the life of the asset(s).

When a residential customer requests a service-line extension of 75-feet or less, and a main extension is required in order to be able to provide the service-line, a Customer Extension Model ("CEM) is conducted.²⁹ Capitalized costs included in the CEM will vary dependent upon each extension request, but would potentially include items such as pipeline interconnects, pressure regulating facilities, lateral delivery lines, distribution mains, and mapping.³⁰ Because the service line is within 75 feet, capitalized costs of the service line- and meter-related equipment are excluded, as they are covered by the 75-foot allowance.

²⁶ MERC notes that reference to a line extension allowance ("LEA") as a "Free-Footage Allowance" is incorrect. LEAs are not providing a service line to the new customer for "free". Rather, a LEA is a tool within the construct of line extension policy that helps to provide new customers with fair access and an economical means to connecting to the natural gas system. The base rates being charged to the new customer recovers the costs of the extension and does so in a manner over several years.

²⁷ As stated at MERC Tariff Sheet No. 9.04, Section 2.A.

²⁸ As stated at MERC Tariff Sheet No. 9.04, Section 2.A.

²⁹ As stated at MERC Tariff Sheet No. 9.05, Section 2.B.

³⁰ As stated at MERC Tariff Sheet No. 9.07, Definitions, 3)

MERC notes that if any abnormal construction conditions exist, the customer must pay for abnormal construction costs.³¹

b. A customer's request for service includes an extension of service and/or main line that exceeds the free-footage allowance.

When a residential customer requests a service-line only (i.e. no main extension is required) that exceeds 75 feet, the customer is required to pay a CIAC based upon the incremental cost of the additional footage beyond 75 feet.³² The cost of the incremental footage is based on the actual cost, not to exceed \$6.00 per foot.³³

When a residential customer requests a service-line extension that is over 75-feet, and a main extension is required in order to be able to provide the service-line, a CEM is conducted.³⁴ Capitalized costs included in the CEM will vary dependent upon each extension request, but would potentially include items such as pipeline interconnects, pressure regulating facilities, lateral delivery lines, distribution mains, and mapping.³⁵ Because residential customers receive a 75-foot service line allowance, capitalized costs of the service line- and meter-related equipment are excluded, but the customer is required to pay a CIAC based upon the incremental cost of the additional footage beyond 75 feet.³⁶ The cost of the excess footage is based on the actual cost, not to exceed \$6.00 per foot.³⁷

When a commercial customer requests a service-line extension, of any length (i.e. no main extension required), a CEM is conducted.³⁸ Capitalized costs included in the CEM will vary dependent upon each extension request, but would include items such as the service line- and meter-related equipment.³⁹

When a commercial customer requests a service-line extension, and a main extension is required in order to be able to provide the service-line, a

³¹ As stated at MERC Tariff Sheet No. 9.04, Section 2.A.(b)

³² As stated at MERC Tariff Sheet No. 9.04, Section 2.A.

³³ As stated at MERC Tariff Sheet No. 9.04, Section 2.A.

³⁴ As stated at MERC Tariff Sheet No. 9.05, Section 2.B.

³⁵ As stated at MERC Tariff Sheet No. 9.07, Definitions, 3)

³⁶ As stated at MERC Tariff Sheet No. 9.04, Section 2.A.

³⁷ As stated at MERC Tariff Sheet No. 9.04, Section 2.A. and Tariff Sheet No. 9.05, Section 2.B.

³⁸ As stated at MERC Tariff Sheet No. 9.05, Section 2.B.

³⁹ As stated at MERC Tariff Sheet No. 9.07, Definitions, 3)

CEM is conducted.⁴⁰ Capitalized costs included in the CEM will vary dependent upon each extension request, but would potentially include items such as pipeline interconnects, pressure regulating facilities, measurement and instrumentation, lateral delivery lines, distribution mains, mapping, regulators, service lines, and meters.⁴¹

MERC notes that if any abnormal construction conditions exist, the customer must pay for abnormal construction costs.⁴²

- 3) When a customer cost feasibility model is employed to determine potential CIAC costs. See 2) above. A CEM is employed in the following situations: 1) a residential customer extension that requires both a service line and main, 2) all extensions to commercial customers, regardless of whether a main extension is involved.⁴³ When a service-line only residential customer extension is over 75-feet, a CIAC consisting of the incremental footage cost will be assessed, but a CEM is not employed to determine the excess footage cost. See 4) below for how excess footage charges are determined.
- 4) How the utility determines the excess footage charge for customers and whether the actual incremental cost is calculated and charged. Excess footage applies to residential customers only. The excess footage charge is based upon actual incremental cost. The incremental costs are negotiated rates charged to MERC by its third party contractor, and the rates are renegotiated annually through a competitive bidding process. The actual incremental footage cost is not to exceed \$6.00 per foot.⁴⁴
 - a. If the actual incremental cost is not calculated, how are any disparities in actual construction costs recovered. See 4) above; not applicable.
 - b. What is the actual average per-foot cost of service and main lines. Not applicable. MERC does not utilize an average cost-per-foot methodology to compute excess footage charges for services, nor does it utilize an average cost-per-foot methodology when computing the CIAC for main extensions.
- 5) How the utility's free-footage allowance is determined. The 75-foot allowance is based upon the historical average footage of residential service lines.

⁴⁰ As stated at MERC Tariff Sheet No. 9.05, Section 2.B.

⁴¹ As stated at MERC Tariff Sheet No. 9.07, Definitions, 3)

⁴² As stated at MERC Tariff Sheet No. 9.04, Section 2.A.(b)

⁴³ As stated at MERC Tariff Sheet No. 9.05, Section 2.B.

⁴⁴ As stated at MERC Tariff Sheet No. 9.04, Section 2.A.

- 6) What pay-back options, if any, the utility offers to customers required to pay a CIAC. MERC does not offer pay-back options for CIACs; CIACs are required to be paid in full at the time of the project.
- 7) Any other rules or considerations relevant to the utility's LEP.

MERC does not decrease or waive customer CIACs. The only language regarding CIAC waiver contained within MERC's LEP and associated tariffs is at MERC Tariff Sheet 9.05:

Once the Company waives any contribution by new customers for main and service extension costs, the Company cannot at any time recover these costs from existing ratepayers.

This language does not allow MERC to waive customer CIAC. This language provides protection to existing ratepayers and clarifies that if a CEM was improperly computed such that it incorrectly assessed zero customer CIAC, after discovering the error, the Company is not allowed to recover those waived CIAC costs from existing ratepayers (via increased base rates). Lastly, the Company notes the very last sentence of MERC Tariff Sheet 9.05, which makes the situation very clear: If a CIAC is required, it will be based on the results of the Customer Extension Model.

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

Docket No. G999/CI-21-565

CERTIFICATE OF SERVICE

I, Colleen T. Sipiorski, hereby certify that on the 8th day of August, 2025, on behalf of Minnesota Energy Resources Corporation (“MERC”), I electronically filed a true and correct copy of the enclosed Reply Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service lists.

Dated this 8th day of August, 2025

/s/ Colleen T. Sipiorski
Colleen T. Sipiorski

Last Name	First Name	Email	Organization	Agency	Delivery M	Alternate	View	Trade	Service List
Ahern	Michael	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		Electronic Service	No			21-5650FFi
Aldrich	Elizabeth	laldrich@bluesource.com	Bluesource		Electronic Service	No			21-5650FFi
Ambach	Gary	gambach@slipstreaminc.org	Slipstream, Inc.		Electronic Service	No			21-5650FFi
Anderson	Kristine	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		Electronic Service	No			21-5650FFi
Arntz	Susan	sarntz@mankatomn.gov	City Of Mankato		Electronic Service	No			21-5650FFi
Aschmann	Mara	mar.a.schmann@xcelenergy.com	Xcel Energy		Electronic Service	No			21-5650FFi
Bayles	Jessica L	jessica.bayles@stoel.com	Stoel Rives LLP		Electronic Service	No			21-5650FFi
Beck	Randall	rbeck3@wm.com	Waste Management Renewable Energy, L.L.C.		Electronic Service	No			21-5650FFi
Bender	David	dbender@earthjustice.org	Earthjustice		Electronic Service	No			21-5650FFi
Benning	Christina	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas		Electronic Service	No			21-5650FFi
Berger	Alicia	alicia.e.berger@xcelenergy.com	Xcel Energy		Electronic Service	No			21-5650FFi
Bertrand	James J.	james.bertrand@stinson.com	STINSON LLP		Electronic Service	No			21-5650FFi
Boughner	Mike	michael.l.boughner@xcelenergy.com	Xcel Energy		Electronic Service	No			21-5650FFi
Brinkman	Tim	tim.brinkman@gvtel.com	Garden Valley Telephone Company d/b/a Garden Valley Technologies		Electronic Service	No			21-5650FFi
Brodin	Matthew	mbrodin@allete.com	Minnesota Power		Electronic Service	No			21-5650FFi
Bull	Mike	mike.bull@state.mn.us		Public Utilities Commission	Electronic Service	Yes			21-5650FFi
Cameron	Roderick	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		Electronic Service	No			21-5650FFi
Canaday	James	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Electronic Service	No			21-5650FFi
Carlson	Thomas	thomas.carlson@edf-re.com	EDF Renewable Energy		Electronic Service	No			21-5650FFi
Carlson Chang	Melodee	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		Electronic Service	No			21-5650FFi
Cherne-Hendrick	Margaret	cherne-hendrick@fresh-energy.org			Electronic Service	No			21-5650FFi
Chilson	Cody	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		Electronic Service	No			21-5650FFi
Choquette	Ray	rchoquette@agp.com	Ag Processing Inc.		Electronic Service	No			21-5650FFi
Coffman	John	john@johncoffman.net	AARP		Electronic Service	No			21-5650FFi
Comer	Sheri	sheri.comer@ftr.com	Frontier Communications Corporation		Electronic Service	No			21-5650FFi
Commerce Attorneys	Generic	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Electronic Service	Yes			21-5650FFi
Comstock	Jean	jean.comstock.dbcc@gmail.com	St. Paul 350		Electronic Service	No			21-5650FFi
Crocker	George	gwillc@nawo.org	North American Water Office		Electronic Service	No			21-5650FFi
DeMerritt	Seth	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		Electronic Service	No			21-5650FFi
Denniston	James	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		Electronic Service	No			21-5650FFi
Dicklich	Tom	tdicklich@metrades.org	Minnesota Building & Construction Trades Council		Electronic Service	No			21-5650FFi
Drake Hamilton	J.	hamilton@fresh-energy.org	Fresh Energy		Electronic Service	No			21-5650FFi
Edstrom	Brian	briane@cupminnesota.org	Citizens Utility Board of Minnesota		Electronic Service	No			21-5650FFi
Farrell	John	jfarrell@lsr.org	Institute for Local Self-Reliance		Electronic Service	No			21-5650FFi
Ferguson	Sharon	sharon.ferguson@state.mn.us		Department of Commerce	Electronic Service	No			21-5650FFi
Fiterman	Mike	mikefiterman@libertydiversified.com	Liberty Diversified International		Electronic Service	No			21-5650FFi
Foster	Mark	mark@housingfirstmn.org	Housing First Minnesota		Electronic Service	No			21-5650FFi
Franco	Lucas	lfranco@liunagro.com	LIUNA		Electronic Service	No			21-5650FFi
Fuentes	Daryll	energy@usg.com	USG Corporation		Electronic Service	No			21-5650FFi
Garvey	Edward	garveyed@aol.com	Residence		Electronic Service	No			21-5650FFi
Goettel	Debbie	debbie.goettel@hennepin.us	Partnership on Waste and Energy		Electronic Service	No			21-5650FFi
Guerrero	Todd J.	todd.guerrero@kutakrock.com	Kutak Rock LLP		Electronic Service	No			21-5650FFi
Haight	Laura	lhaight@ppl.com	Partnership for Policy Integrity		Electronic Service	No			21-5650FFi
Havey	Kim	kim.havey@minneapolispolismn.gov	City of Minneapolis		Electronic Service	No			21-5650FFi
Hayet	Philip	phayet@jkenn.com	J. Kennedy and Associates, Inc.		Electronic Service	No			21-5650FFi
Heinen	Adam	aheinen@dakotaelectric.com	Dakota Electric Association		Electronic Service	No			21-5650FFi
Henkel	Annette	nui@mnutillinvestors.org	Minnesota Utility Investors		Electronic Service	No			21-5650FFi
Hoffman Malueg	Joylyn C	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		Electronic Service	No			21-5650FFi
Hoppe	Michael	lu23@ibew23.org	Local Union 23, I.B.E.W.		Electronic Service	No			21-5650FFi
Jacobson	Travis	travis.jacobson@mdu.com	Great Plains Natural Gas Company		Electronic Service	No			21-5650FFi
Jaimez	John	john.jaimez@hennepin.us			Electronic Service	No			21-5650FFi
Jenkins	Alan	aj@jenkinsatlaw.com	Jenkins at Law		Electronic Service	No			21-5650FFi
Johnson	Richard	rick.johnson@lawmoss.com	Moss & Barnett		Electronic Service	No			21-5650FFi
Johnson Phillips	Sarah	sphilips@stoel.com	Stoel Rives LLP		Electronic Service	No			21-5650FFi
Jordan	Brendan	bjordan@ppsd.net	Great Plains Institute & Bioeconomy Coalition of MN		Electronic Service	No			21-5650FFi
Kalbourne	David	edk@revinc.com	REV INC, LLC		Electronic Service	No			21-5650FFi
Kalmon	D	dkalmon@mwmgo.org	Mississippi Watershed Management Organization		Electronic Service	No			21-5650FFi
Kenworthy	William	will@votesolar.org	Kennedy & Graven, Chartered		Electronic Service	No			21-5650FFi
Ketchum	Samuel B.	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		Electronic Service	No			21-5650FFi
Kingston	Hudson	hudson@curemn.org		Minnesota Pollution Control Agency	Electronic Service	No			21-5650FFi
Kohlasch	Frank	frank.kohlasch@state.mn.us			Electronic Service	No			21-5650FFi
Kupser	Nicolle	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		Electronic Service	No			21-5650FFi
Kyle	Brenda	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		Electronic Service	No			21-5650FFi
Laney	Carmel	carmel.laney@stoel.com	Stoel Rives LLP		Electronic Service	No			21-5650FFi
Larson	Peder	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		Electronic Service	No			21-5650FFi
Lems	Robert	administration@dm-t-cgs.com	DMT Clear Gas Solutions		Electronic Service	No			21-5650FFi
Leonard	Rachel	rachel.leonard@ci.monticello.mn.us	City of Monticello		Electronic Service	No			21-5650FFi
Levenson Falk	Annie	anniefalk@minneapolispolismn.gov	Citizens Utility Board of Minnesota		Electronic Service	No			21-5650FFi
Liberkowsky	Amy	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		Electronic Service	No			21-5650FFi
Loos	Jason	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		Electronic Service	No			21-5650FFi
Maini	Kavita	kmainsi@wi.rr.com	KM Energy Consulting, LLC		Electronic Service	No			21-5650FFi
Marshall	Emily	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		Electronic Service	No			21-5650FFi
Martinez	Linda	lmartinez@auri.org	Agricultural Utilization Research Institute		Electronic Service	No			21-5650FFi
Martinka	Mary	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		Electronic Service	No			21-5650FFi
Maxwell	Daryl	dmaxwell@hydro.mb.ca	Manitoba Hydro		Electronic Service	No			21-5650FFi
McNair	Taylor	taylor@gridlab.org	Gridlab		Electronic Service	No			21-5650FFi
Mead	Sarah	sarah.mead@wecenergygroup.com	MERC		Electronic Service	No			21-5650FFi
Meyer	Joseph	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Electronic Service	No			21-5650FFi
Miller	Stacy	stacy.miller@minneapolispolismn.gov	City of Minneapolis		Electronic Service	No			21-5650FFi
Moeller	David	dmoeller@allete.com	Minnesota Power		Electronic Service	No			21-5650FFi
Moratzka	Andrew	andrew.moratzka@stoel.com	Stoel Rives LLP		Electronic Service	No			21-5650FFi
Mulholland	Evan	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		Electronic Service	No			21-5650FFi
Muller	Alan	alan@greendel.org	Energy & Environmental Consulting		Electronic Service	No			21-5650FFi
Nelson	Carl	cnelson@mncee.org	Center for Energy and Environment		Electronic Service	No			21-5650FFi
Niles	David	david.niles@avantenergy.com	Minnesota Municipal Power Agency		Electronic Service	No			21-5650FFi
Norris	Samantha	samanthanorris@alliantenergy.com	Interstate Power and Light Company		Electronic Service	No			21-5650FFi
O'Brien	M. William	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		Electronic Service	No			21-5650FFi
O'Connell	Ric	ric@gridlab.org	Gridlab		Electronic Service	No			21-5650FFi
Overland	Carol A.	overland@legalelectric.org	Legalelectric - Overland Law Office		Electronic Service	No			21-5650FFi
Palmer	Greg	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		Electronic Service	No			21-5650FFi
Palmer Denig	Jessica	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	Electronic Service	No			21-5650FFi
Paris	Antonio	aparisi@sacyr.com	Sacyr Environment USA LLC		Electronic Service	No			21-5650FFi
Pence	Bret	bretence@mnppl.org	Minnesota Interfaith Power and Light		Electronic Service	No			21-5650FFi
Phillips	Catherine	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		Electronic Service	No			21-5650FFi
Porter	J.	greg.porter@ngco.com	Northern Natural Gas Company		Electronic Service	No			21-5650FFi
Pranis	Kevin	kpranis@liunagro.com	Laborers' District Council of MN and ND		Electronic Service	No			21-5650FFi
Residential Utilities Division	Generic Notice	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Electronic Service	Yes			21-5650FFi
Reuther	Kevin	kreuther@mncenter.org	MN Center for Environmental Advocacy		Electronic Service	No			21-5650FFi
Runke	Nathaniel	nrunke@local49.org			Electronic Service	No			21-5650FFi
Saevarsson	Bjorgvin	bjorgvin@yorthgroup.com	Yorth		Electronic Service	No			21-5650FFi
Saville	Kevin	kevin.saville@ftr.com	Citizens/Frontier Communications		Electronic Service	No			21-5650FFi
Schmiesing	Elizabeth	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		Electronic Service	No			21-5650FFi
Schwartz	Christine	regulatory.records@xcelenergy.com	Xcel Energy		Electronic Service	No			21-5650FFi
Seaton	Douglas	doug.seaton@umwic.org	Upper Midwest Law Center		Electronic Service	No			21-5650FFi
Serfass	Patrick	info@americabiogasCouncil.org	American Biogas Council		Electronic Service	No			21-5650FFi
Serfass	Patrick	pserrfass@americabiogasCouncil.org	American Biogas Council		Electronic Service	No			21-5650FFi
Shaddix Eiling	Janet	jshaddix@janeshaddix.com	Shaddix And Associates		Electronic Service	No			21-5650FFi
Shedlock	Andrew R.	andrew.shedlock@kutakrock.com	Kutak Rock LLP		Electronic Service	No			21-5650FFi
Smith	Beth	bsmith@greatermankato.com	Greater Mankato Growth		Electronic Service	No			21-5650FFi
Smith	Joshua	joshua.smith@sierraclub.org			Electronic Service	No			21-5650FFi
Smith	Ken	ken.smith@districtenergy.com	District Energy St. Paul Inc.		Electronic Service	No			21-5650FFi
Soholt	Beth	bsoholt@cleargridalliance.org	Clean Grid Alliance		Electronic Service	No			21-5650FFi
Sommer	Anna	asommer@energyfuturesgroup.com	Energy Futures Group		Electronic Service	No			21-5650FFi
Sorum	Peggy	peggy.sorum@centerpointenergy.com	CenterPoint Energy		Electronic Service	No			21-5650FFi
Spurr	Mark	mspurrr@fvbenergy.com	International District Energy Association		Electronic Service	No			21-5650FFi
Starns	Byron E.	byron.starns@stinson.com	STINSON LLP		Electronic Service	No			21-5650FFi
Stask	Richard	richard.stask@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		Electronic Service	No			21-5650FFi
Stastny	Kristin	kstastny@ftr.com	Taft Stettinius & Hollister LLP		Electronic Service	No			21-5650FFi
Strommen	James M	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		Electronic Service	No			21-5650FFi
Sulem	Kent	ksulem@muaa.org			Electronic Service	No			21-5650FFi
Tomich	Matthew	tomich@energy-vision.org	Energy Vision		Electronic Service	No			21-5650FFi
Voeck	Julie	julie.voeck@nee.com	NextEra Energy Resources, LLC		Electronic Service	No			21-5650FFi

Wade	Sam	sam@rngcoalition.com	Coalition for Renewable Natural Gas		Electronic Service	No	21-565OFFi
Warmuth	Jenna	jenna@rewiringamerica.org	Rewiring America		Electronic Service	No	21-565OFFi
Westling	Nicole	nicole.westling@state.mn.us		Department of Commerce	Electronic Service	No	21-565OFFi
Whelan	Casey	cwhelan@kinectenergy.com	Kinect Energy Group		Electronic Service	No	21-565OFFi
Williams	Laurie	laurie.williams@sierraclub.org	Sierra Club		Electronic Service	No	21-565OFFi
Windler	Joseph	jwindler@winthrop.com	Winthrop & Weinstein		Electronic Service	No	21-565OFFi
Wulling	Tim	t.wulling@earthlink.net			Electronic Service	No	21-565OFFi
Zimmerman	Grant	gzimmerman@ampamericas.com	Amp Americas		Electronic Service	No	21-565OFFi
Zimmerman	Kurt	kwz@ibew160.org	Local Union #160, IBEW		Electronic Service	No	21-565OFFi
Zomer	Patrick	pat.zomer@lawmoss.com	Moss & Barnett PA		Electronic Service	No	21-565OFFi

