
BEFORE THE MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS
600 North Robert Street
St. Paul, Minnesota 55101

FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 7th Place East
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St. Paul, Minnesota 55101-2147

MPUC Docket Nos. G-008/M-21-138; G-004/M-21-235;
G-002/CI-21-610; and G-011/CI-21-611
OAH Docket No. 71-2500-37763

In the Matter of the Petitions for Recovery of Certain Gas Costs

***In the Matter of the Petition of CenterPoint Energy for Approval of a
Recovery Process for Cost Impacts Due to February Extreme Gas
Market Conditions***

***In the Matter of the Petition by Great Plains Natural Gas Co. for
Approval of Rule Variances to Recover High Natural Gas Costs from
February 2021***

***In the Matter of the Petition of Northern States Power Company d/b/a
Xcel Energy to Recover February 2021 Natural Gas Costs***

***In the Matter of the Petition of Minnesota Energy Resources
Corporation for Approval of a Recovery Process for Cost Impacts
Due to February Extreme Gas Market Conditions***

**SURREBUTTAL TESTIMONY AND SCHEDULES OF THE OFFICE OF THE
MINNESOTA ATTORNEY GENERAL—RESIDENTIAL UTILITIES DIVISION**

WITNESS:

BRIAN LEBENS

February 11, 2022

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	PRUDENCE STANDARDS	1
III.	COMMISSION ORDERS	4
A.	CENTERPOINT	5
B.	XCEL.....	9
IV.	SWING FUTURES.....	11
V.	HEDGING FOR UNANTICIPATED EVENTS.....	12
VI.	INCENTIVES	13
VII.	ALTERNATIVES.....	15
VIII.	CONCLUSIONS.....	17

1 **I. INTRODUCTION**

2 **Q. Please state your name and occupation.**

3 A. My name is Brian Lebens. I am a financial analyst with the Office of the Minnesota
4 Attorney General.

5 **Q. Have you previously provided testimony in this proceeding?**

6 A. Yes. I provided direct testimony on December 22, 2021.

7 **Q. What is the purpose of your surrebuttal testimony?**

8 A. I respond to the rebuttal testimony of witnesses including Ms. Mead, Mr. Smead, Mr. Reed,
9 Mr. Eidukas, Mr. Sexton, Mr. Nieuwsma, Ms. Grizzle, Mr. Krug, Mr. Levine, Mr.
10 Boughner, and Mr. Johnson who are employees or consultants testifying on behalf of
11 CenterPoint, Xcel, MERC, and Great Plains.

12 **Q. Do you respond individually to each topic raised by all eleven of those witnesses?**

13 A. No. I discuss the prudence standard and explain Commission Orders on financial hedging.
14 I also provide information to the Commission regarding swing futures in Section IV, I
15 discuss hedging for unanticipated events in Section V, and I explain incentives in Section
16 VI. Finally, I discuss potential alternatives in Section VII.

17 **II. PRUDENCE STANDARDS**

18 **Q. Did the utilities discuss the standard that the Commission should apply in**
19 **determining whether it should disallow some of the \$661 million at issue in this case?**

20 A. Yes. Xcel states that the key prudence question is the following:

21 Did the Company act reasonably, with the information it knew or should
22 have known at time, when it made the decisions that resulted in its incurring
23 the gas supply costs at issue?¹

¹ Krug Rebuttal at 5:10-12.

1 **Q. Do you take issue with that assertion?**

2 A. No.

3 **Q. Did the Commission restrict the timeline for assessing the prudence of utility actions**
4 **prior to the event in February 2021 in this prudence investigation?**

5 A. No. The Commission left it open-ended. Specifically, it used the phrase “before, during,
6 and after the February Event.”² It did not limit how far before the event prudence should
7 be assessed.

8 **Q. Do the utilities seem to be acting as though the Commission limited the prudence**
9 **assessment to only a few months before the event?**

10 A. Yes. They apply a hindsight view to the few months before (and during) the event to
11 suggest that hedges did not exist and could not exist.

12 **Q. Applying a hindsight view to the few months before and during the February Event,**
13 **do you agree that there was limited liquidity?**

14 A. Yes. To the extent that hedges (or other methods to avoid extreme prices) did not exist or
15 were thinly traded, it was partly because the utilities did not use them. If utilities had been
16 prudently hedging or adjusting hedges in response to market conditions, the hedges would
17 have been more liquid. Additionally, the utilities had only limited incentive to pursue
18 stable gas prices, which I will discuss in Section VI below.

² ORDER GRANTING VARIANCES AND AUTHORIZING MODIFIED COST RECOVERY SUBJECT TO PRUDENCE REVIEW, AND NOTICE OF AND ORDER FOR HEARING at 7, 22 (Aug. 30, 2021).

1 **Q. Did your direct testimony attempt to avoid hindsight as much as possible and help**
2 **develop the record that the Commission requested, which again was to assess**
3 **prudence at all times before the event, not just during the few months before the**
4 **event?**

5 **A.** Yes. As I said in direct testimony, it is valuable to look at the price action that occurred
6 for actual hedges during February 2021 largely because it mimics how other hedges would
7 have performed, and because it mimics how hedged swing contracts would have performed
8 if they had been in place. Additionally, I explained that other more targeted hedges may
9 have performed better than the one specific example that I explained. I provided the actual
10 market prices that occurred during the event for one particular strike price for one particular
11 type of hedge; there are a vast number of different strike prices available (i.e. ceiling prices
12 and floor prices) for a number of different hedges that mimic the outcome of better-targeted
13 hedges that the utilities could have pursued well in advance. These better-targeted hedges
14 include over-the-counter (“OTC”)-type contracts, which are fully customizable and
15 generally require advance planning.

1 **Q. Xcel stressed the importance of considering “the full context of the environment in**
2 **which the Company was operating.”³ Do you believe there are other components that**
3 **should also be considered as part of this “full context”?**

4 A. Yes. I would add at least five which were part of the context for all four utilities:

- 5 1. The utilities should have been aware of previous price spikes generally, and over
6 long weekends specifically, such as New Year’s Eve 2017/18.
- 7 2. The utilities should have been aware of previous freeze-offs in North America’s
8 natural gas infrastructure.
- 9 3. The utilities should have been aware of the forecast on February 8, 2021 for
10 potential freeze-offs.
- 11 4. The utilities were operating under the assumption that all gas costs would be paid
12 by their customers and not by shareholders or the company.
- 13 5. The comments from utility customers in this docket demonstrate that there were
14 essentially unanimous customer expectations for gas prices that remain in the
15 expected range and to avoid extreme prices. The utilities should have been aware
16 of that.

17 **Q. What is the key question the Commission must answer related to your testimony?**

18 A. The Commission must answer the following question: Would it have been reasonable and
19 prudent for the four utilities to have negotiated ceilings and floors into their swing
20 contracts, or to have otherwise established a method to maintain the expected range of gas
21 prices and avoid extreme prices?

22 **Q. Should the four utilities have done this?**

23 A. Yes.

24 **III. COMMISSION ORDERS**

25 **Q. Did the utilities discuss Commission Orders?**

26 A. Yes. In rebuttal testimony, the utilities raised questions about how the Commission’s
27 Orders apply to them. But Great Plains explained that it “has not identified an options

³ Krug Rebuttal at 5-6.

1 strategy that it believes provides benefit to its customers; thus, has not had meaningful
2 conversations with the Commission regarding implementing such hedging, including
3 put/call options or on the timing or adjustments of such.”⁴

4 I will further discuss the Commission’s Orders related to CenterPoint and Xcel in turn
5 below.

6 **A. CENTERPOINT**

7 **Q. Did the Commission’s January 13, 2020 Order in PUC docket 19-699 approve the**
8 **Petition of CenterPoint Energy for Approval of an Extension of Rule Variances to**
9 **Minnesota Rules to Recover the Costs of Certain Natural Gas Financial Instruments**
10 **Through the Purchased Gas Adjustment Clause?**

11 A. Yes.

12 **Q. Did the Commission Order dictate the timing of CenterPoint’s hedges?**

13 A. It does not appear so. CenterPoint was not forced to fully exhaust its maximum allowed
14 hedging capability prior to winter.

15 **Q. Did CenterPoint fully exhaust its maximum allowed hedging capability prior to**
16 **winter?**

17 A. It appears to be CenterPoint’s position that it did not use *any* of the 26 Bcf of financial
18 hedging that the Commission approved. It could have hedged 26 Bcf at any time, but
19 decided not to.⁵

⁴ Schedule BPL-S-1 (Great Plains Response to OAG IR 004).

⁵ Additionally, the Commission approved it to spend and recover up to \$6.5 million through its Purchased Gas Adjustment Clause.

1 **Q. Did the Commission Order restrict CenterPoint from adjusting hedges in response to**
2 **changing market conditions?**

3 A. It does not appear so. But, CenterPoint’s proposal said: “To hedge effectively, CenterPoint
4 Energy’s gas supply portfolio must contain a diversity of hedges so that it has the flexibility
5 to adjust based on changing market conditions.”⁶

6 **Q. Did the Commission Order dictate whether CenterPoint should use daily, monthly,**
7 **or seasonal hedges?**

8 A. It does not appear so. CenterPoint was free to make a wide variety of decisions to achieve
9 things like its explanation that “[h]edging winter gas supply prices stands to protect the
10 Company’s customers from the most severe price spikes during the coldest and, thus
11 highest consumption, periods of the year.”⁷ But there is one area that is not entirely clear
12 regarding the types of hedges that CenterPoint was allowed to use: CenterPoint did propose
13 to use futures contracts, but the Commission’s Order does not specifically approve them,
14 other than a general approval of CenterPoint’s proposal. CenterPoint explained in its
15 proposal that a “futures contract is used to lock-in the price of natural gas for customers.”⁸
16 If the Commission finds that it approved CenterPoint’s request to use futures contracts, it
17 is worth noting that a swing future is one type of futures contract. Futures contracts
18 function similarly to a collar that has the same the ceiling price and floor price. I will
19 discuss swing futures in Section IV below.

⁶ *In the Matter of the Petition of CenterPoint Energy (CenterPoint) for Approval of an Extension of Rule Variances to Minnesota Rules to Recover the Costs of Certain Natural Gas Financial Instruments Through the Purchased Gas Adjustment (PGA)*, MPUC Docket No. G-008/M-19-699, Petition of CenterPoint Energy for Approval of an Extension of Rule Variances to Minnesota Rules to Recover the Costs of Certain Natural Gas Financial Instruments Through the Purchased Gas Adjustment Clause at 13 (Nov. 5, 2019) [hereinafter CenterPoint Variance Petition].

⁷ CenterPoint Variance Petition at 7.

⁸ CenterPoint Variance Petition at 8.

1 **Q. Did the Commission Order restrict CenterPoint from requesting to incorporate**
2 **hedging costs into its base rates?**

3 A. It does not appear so.

4 **Q. Did the Commission Order restrict CenterPoint from requesting to incorporate**
5 **hedging costs into other mechanisms like riders or trackers?**

6 A. It does not appear so.

7 **Q. So, all four of the utilities could have spent more than \$6.5 million on financial**
8 **hedging on their customers behalf and requested to recover it through base rates or**
9 **through a rider or tracker?**

10 A. That appears to be the case, but there is no guarantee that the Commission would approve
11 such a request.

12 **Q. Did CenterPoint object to the recommendation outlined in the Department’s analysis**
13 **of its variance petition?**

14 A. It does not appear so. In fact, on December 11, 2019, CenterPoint explained that it
15 “appreciates the analysis and Comments provided by the Department and supports the
16 recommendation outlined in the Department’s analysis.”⁹

17 **Q. Did the Commission deny CenterPoint’s petition?**

18 A. No, the Commission approved CenterPoint’s petition and incorporated the Department’s
19 analysis into its Order.

⁹ *In the Matter of the Petition of CenterPoint Energy (CenterPoint) for Approval of an Extension of Rule Variances to Minnesota Rules to Recover the Costs of Certain Natural Gas Financial Instruments Through the Purchased Gas Adjustment (PGA)*, MPUC Docket No. G-008/M-19-699, Letter from CenterPoint (Dec. 11, 2019).

1 **Q. Did the Commission approve the annual compliance filing that CenterPoint was**
2 **required to file after it has been approved by Company management?**

3 A. No, it appears that CenterPoint filed it after it was approved by Company management, but
4 the Commission does not specifically approve or deny those filings.

5 **Q. Did CenterPoint admit that it did not make any major changes to its Gas Purchase**
6 **Plan in response to the 2017/18 New Year's Event or the 2019 Polar Vortex Event?**

7 A. Yes, it said:

8 The Company continuously reviews gas prices, however after the 2017/18
9 New Year's Event or the 2019 Polar Vortex Event, the Company still
10 believed that the probability of gas price spikes was low and that the spikes
11 experienced were anomalies. Therefore, the Company did not make any
12 major changes to its Gas Purchase Plan in response to those events.¹⁰

13 **Q. What is a commodity?**

14 A. A commodity can be described as a "standardized good, which is traded in bulk and whose
15 units are interchangeable."¹¹ In this docket, the commodity is natural gas.

16 **Q. How did CenterPoint describe "The Company's Commodity Purchasing Practices"**
17 **in its proposal that the Commission approved?**

18 A. The following is CenterPoint's description of its Commodity Purchasing Practices at page
19 seven of its petition in MPUC Docket 19-699:

20 The Company's Commodity Purchasing Practices
21 CenterPoint Energy's gas procurement objective is to provide reasonably
22 priced and reliable natural gas supply to its customers. CenterPoint Energy
23 uses firm supplies (based on both first-of-the-month index pricing and spot
24 market prices to meet daily swings), contract storage, and company-owned
25 storage and peak-shaving resources. Sources of supply are analyzed
26 considering cost, reliability, and logistics. Company guidelines call for a
27 diversified supply portfolio in order to maintain long-term system reliability
28 and flexibility.

¹⁰ Lebens Direct, Schedule BPL-D-6 at 6.

¹¹ <https://www.oxfordreference.com/view/10.1093/oi/authority.20110803095627361>

1 The Company's objective in hedging the price it pays for a portion of its
2 winter natural gas supply is to maintain a gas supply portfolio that has a
3 predictable and stable price. Even when the market prices of gas appear to
4 be somewhat stable, many factors beyond the control of the Company could
5 occur that would create high price volatility and even extreme short-term
6 fly-ups in market prices. Hedging winter gas supply prices stands to protect
7 the Company's customers from the most severe price spikes during the
8 coldest and, thus highest consumption, periods of the year.

9 CenterPoint Energy plans to continue to use both physical transactions and
10 financial transactions in its Minnesota region to accomplish its hedging
11 objectives. Use of the physical transactions means that the Company's
12 suppliers provide supply contracts that incorporate the desired hedge into
13 the supply contract, thereby accomplishing the same financial results that
14 the Company would have if it contracted for physical supplies at an index
15 price, then bought separate financial instruments to hedge the price of those
16 supplies.

17 The ability to use separate financial instruments, purchased directly by
18 CenterPoint Energy, may provide significant administrative ease and
19 flexibility when executing hedging transactions. As the diversity increases,
20 the ability to use financial instruments versus physical hedges could provide
21 even more value to CenterPoint Energy's customers.¹²

22 **B. XCEL**

23 **Q. Is the Commission Order for Xcel similar to the one for CenterPoint?**

24 A. It appears to be somewhat similar in that it did not dictate the exact hedge type, hedge
25 timing, or ability to adjust hedges in response to market conditions, but it is somewhat
26 different from the Order for CenterPoint because it "[a]llowed Xcel to hedge no more than
27 50 percent of its annual winter requirements and no more than 25 percent with financial
28 instruments."¹³

¹² CenterPoint Variance Petition at 8.

¹³ *In the Matter of the Petition of Northern States Power Company for Approval of an Extension of Rule Variances to Recover the Costs of Financial Instruments through the Purchased Gas Adjustment Clause*, MPUC Docket No. G-002/M-19-703, Commission Order at 1 (Feb. 12, 2020).

1 **Q. What does that mean?**

2 A. It appears that Xcel's hedging was somewhat more restricted than CenterPoint's hedging;
3 CenterPoint was only restricted in financial hedging and could essentially place unlimited
4 physical hedges (such as physical storage or hedged physical swing supply).

5 **Q. Does this limit Xcel's ability to use financial hedging?**

6 A. Yes, but again, it still had flexibility in terms of hedge type, timing, and ability to adjust in
7 response to market conditions.

8 **Q. Did Xcel's hedging proposal discuss "protection from potential sharp increases in**
9 **natural gas prices" and "serv[ing] the public interest by mitigating price volatility**
10 **risk for our customers?"**

11 A. Yes. In its Overview of its petition, it explained the following:

12 Even in today's low-priced natural gas market, hedging can be used to
13 minimize the level of potential price/cost volatility. In addition, in light of
14 lower natural gas prices, opportunities may exist to lock in the lower prices
15 for future natural gas purchases, thus providing inexpensive natural gas
16 supplies for our customers. Finally, we anticipate using low-cost or
17 minimal-cost hedging instruments to help minimize the costs of hedging for
18 customers in return for protection from potential sharp increases in natural
19 gas prices. Thus, granting our requested variances would serve the public
20 interest by mitigating price volatility risk for our customers.¹⁴

21 **Q. How does Xcel define volatility in its hedging proposal?**

22 A. It provides a paragraph titled "Definition of Volatility," as follows:

23 This plan is titled 'Gas Price Volatility Mitigation Plan,' however it should
24 be noted that the academic definition of the word volatility is not being used
25 in the title or throughout this document. For purposes of this document, the
26 "volatility" that the plan is mitigating against is sharp upward price
27 movement only. It is assumed in this document that downward price
28 "volatility" is considered beneficial to the ratepayers and therefore the plan
29 does not specifically attempt to mitigate downward price volatility.¹⁵

¹⁴ *In the Matter of the Petition of Northern States Power Company for Approval of an Extension of Rule Variances to Recover the Costs of Financial Instruments through the Purchased Gas Adjustment Clause*, MPUC Docket No. G-002/M-19-703, Petition (Feb. 12, 2020).

¹⁵ *Id.* at Attachment A, pp. 1-2.

1 **Q. Does this suggest that Xcel is aware that customers want a reasonable range of prices**
2 **and therefore want to avoid sharp upward price movements?**

3 A. Yes.

4 **IV. SWING FUTURES**

5 **Q. Did the utilities admit that they were aware of swing futures prior to the event?**

6 A. Yes, they explained that they were generally aware of them.¹⁶

7 **Q. What are swing futures?**

8 A. They allow a utility to lock-in the price of gas at a specific location like Ventura or Demarc
9 ahead of time.¹⁷

10 **Q. Given enough time to plan ahead in order to achieve a goal to maintain a reasonable**
11 **range of gas prices, is it possible that a utility could have directly negotiated with**
12 **another party to mimic a swing future using an OTC-type contract?**

13 A. Yes, if the utility engaged in proper advance planning.

14 **Q. Would it be prudent for a utility to plan ahead and implement an OTC-type contract**
15 **to achieve a goal to maintain a reasonable range of prices and avoid extreme prices,**
16 **whether it mimics a swing future or mimics a different arrangement in order to**
17 **achieve such goals?**

18 A. Yes. That “different arrangement” could be many things, including something like the
19 following: swing supply with a built-in price ceiling and price floor.

¹⁶ Schedule BPL-S-2 (Xcel Response to OAG IR 20; MERC Response to OAG IR 5; CenterPoint Response to OAG IR 11; Great Plains Response to OAG IR 6).

¹⁷Schedule BPL-S-3 (<https://www.theice.com/products/6590234/NNG-Ventura-Swing-Future>;
<https://www.theice.com/products/6590226/NNG-Demarc-Swing-Future>).

1 **V. HEDGING FOR UNANTICIPATED EVENTS.**

2 **Q. Did CenterPoint suggest that “[n]o one in the market predicted, or could have**
3 **predicted, that prices would spike to the levels that they did. Therefore, it is**
4 **unreasonable to assume that anyone in the market would, or should, have taken steps**
5 **in advance to hedge (i.e., anticipate) an unanticipated price risk” because “the**
6 **February Market Event was historic and unanticipated.”¹⁸**

7 A. Yes.

8 **Q. Do you agree?**

9 A. Partly, I agree that no one predicted, or could have predicted, that prices would spike to the
10 levels that they did. But I disagree with CenterPoint’s comment that “it is unreasonable to
11 assume that anyone in the market would, or should, have taken steps *in advance* to hedge
12 (i.e., anticipate) an unanticipated price risk.”¹⁹

13 Hedging should generally be done in advance. It is not prudent to wait until a after
14 an unexpected car accident or natural disaster to purchase auto or home insurance. One of
15 the benefits of hedging is that one need not predict or anticipate the exact time or amount
16 of an unanticipated commodity price risk; one only needs to place an appropriate hedge
17 ahead of time so that it is there when needed to maintain an expected range of commodity
18 prices and avoid extreme prices.

19 **Q. Is there an upper limit on the price protection offered by call options?**

20 A. No, call options (and therefore ceiling prices on physical supply contracts) have no upper
21 limit—the price could have spiked to a million dollars (or more) and the buyer would have
22 only had to pay the ceiling price (i.e. the strike price of the call option.)

¹⁸ Grizzle Rebuttal at 52:1-5.

¹⁹ Grizzle Rebuttal at 52:1-5.

1 **Q. How should the utilities have hedged for unanticipated events?**

2 A. As I have said, the utilities should have implemented price ceilings and price floors in their
3 swing contracts to ensure that prices remained inside the expected range of prices; the \$71
4 to \$92 million disallowance I explained in Section VI of my Direct Testimony “mimic[s]
5 how a relatively small number of hedged swing contracts would have performed had they
6 been in place.”²⁰ Additionally, prudently implemented OTC-type contracts, given enough
7 planning ahead of time could have completely avoided all prices above \$20.

8 **VI. INCENTIVES**

9 **Q. Did the utilities discuss the incentives that may result if the Commission Orders a**
10 **disallowance in this case?**

11 A. Yes. Xcel said, “[a]dopting Mr. Lebens’ disallowance proposal would encourage
12 speculative trading in financial instruments by the Minnesota gas utilities.”²¹

13 **Q. Do you agree?**

14 A. No, a disallowance (or an equivalent alternative) would encourage utilities to avoid
15 speculating that prices may remain in an expected range or decrease. Section VI in my
16 direct testimony used actual data from February 2021 to show how better-targeted hedges
17 would have performed if they had been in place. Utilities would be encouraged to pursue
18 better-targeted hedges similar to (1) swing futures, (2) swing supply with ceiling and floor
19 prices, (3) OTC-type contracts, or (3) other similar arrangements to maintain an expected
20 range of prices. All stakeholders, including me, likely agree with Xcel that it is not prudent
21 or reasonable for utilities to engage in “speculative trading in financial instruments.”²²

²⁰ Lebens Direct at 23:21-22.

²¹ Levine Rebuttal at 6:20-21.

²² Levine Rebuttal at 6:20-21.

1 **Q. Did Xcel discuss the possibility of locking in prices?**

2 A. Yes, to use the term Xcel used in its hedging petition, the utilities did not “lock-in” prices
3 to provide greater price certainty.²³ The utilities did not lock-in prices and instead decided
4 to speculate by waiting to see if prices would decline or remain relatively steady.

5 **Q. Given that this docket is evaluating all timeframes prior to the event, what are the**
6 **utility incentives regarding gas commodity costs?**

7 A. It has evolved over the last several decades. Purchased Gas Adjustment clauses were
8 introduced so utilities could pass the commodity cost of gas on to their customers instead
9 of retaining the financial risk of price spikes as they did previously. This means that the
10 risk of a price spike shifted away from shareholders and toward customers.

11 **Q. Did the Commission explain that to the Minnesota Legislature?**

12 A. Yes, in a Utility Rates Study dated June 2010 it said:

13 Until fuel costs started to fluctuate sharply in the 1970s, some energy
14 utilities had to operate without the ability to adjust prices outside a rate case.
15 These utilities shouldered the risks of events between rate cases, but they
16 also retained any high returns from favorable happenings.
17 ...

18 The major objective of FACs and PGAs, implanted during that era, was to
19 shield the utility’s earnings from commodity price volatility. Both debt and
20 equity investors favor these mechanisms in reducing the riskiness of a
21 utility’s earnings and cash flow.²⁴

²³ *In the Matter of the Petition of Northern States Power Company for Approval of an Extension of Rule Variances to Recover the Costs of Financial Instruments through the Purchased Gas Adjustment Clause*, MPUC Docket No. G-002/M-19-703, Petition at 7 (Feb. 12, 2020).

²⁴ PUBLIC UTILITIES COMMISSION: STATE OF MINNESOTA, UTILITY RATES STUDY: JUNE 2010, https://mn.gov/puc/assets/012854_tcm14-5188.pdf

1 **Q. Since then, has the company’s financial incentive to maintain a reasonable range of**
2 **gas prices declined?**

3 A. Yes, after shareholders no longer “shouldered the risks,” the incentive was reduced, but
4 not completely eliminated.

5 **Q. Have tools evolved since then to maintain an expected range of prices?**

6 A. Yes, such tools regularly evolve, they are certainly not set in stone as the utilities seem to
7 imply or assume.

8 **Q. Did the regulatory structure in Minnesota incent or allow any utilities to completely**
9 **avoid all gas prices above the \$20 threshold being used in this docket?**

10 A. Yes, Greater Minnesota Gas explained that it was able to completely avoid any and all
11 prices above \$20, likely due, in part, to its hedging activity, and is therefore not at risk of
12 a potential disallowance in this docket.

13 **VII. ALTERNATIVES**

14 **Q. Did the utilities suggest that “disallowances are not the only option to reduce bill**
15 **impacts for customers?”**

16 A. Yes, Xcel said it is “concerned by the impact the February event has on customers and their
17 bills” and that “disallowances are not the only option to reduce bill impacts for
18 customers.”²⁵

19 **Q. Is the OAG open to discuss all ideas, including those that help Minnesotans afford**
20 **their lives?**

21 A. Yes. It is important to consider other options that mitigate the bill impacts of reasonably
22 and prudently incurred costs. Such options, however, are not a substitute for disallowing

²⁵ Krug Rebuttal at 6-7.

1 any costs that the utilities have not proved were reasonably and prudently incurred, and
2 should not serve as a justification for charging such costs to ratepayers.

3 **Q. Did Xcel discuss any forward-looking changes to address gas price increases such as**
4 **the February event?**

5 A. Yes. Xcel stated that it welcomes “an analysis of the potential costs and benefits of any
6 such forward-looking changes.”²⁶ I agree that it is important to look at ways to mitigate
7 future gas price spikes using the lessons learned from the February event.

8 **Q. Does Xcel seem to present forward-looking reforms and disallowances as an either/or**
9 **proposition, claiming that its analysis of such changes for the future is a “far more**
10 **constructive approach” than evaluating current disallowances based on the “hedging,**
11 **forecasting, and purchasing” that occurred leading up to or during the February**
12 **event?**

13 A. Yes.²⁷

14 **Q. Do you believe that forward-looking changes are a substitute for disallowances in this**
15 **docket?**

16 A. No. While I am a strong proponent of continuous improvement, such forward-looking
17 improvements are not a substitute for disallowing previously incurred imprudent costs.

²⁶ Krug Rebuttal at 28.

²⁷ Krug Rebuttal at 28-29.

1 **Q. Did Xcel (along with the other utilities) specifically request this contested case to**
2 **address proposed disallowances, while simultaneously asking the Commission to open**
3 **a separate new docket to examine “policy and market changes that could be**
4 **implemented on a going-forward basis to prevent or protect against future price**
5 **events?”**

6 A. Yes, while Xcel now presents the issues as related, the four utilities previously requested
7 this case in a jointly filed letter to the Commission on July 19, 2021,²⁸ and in that same
8 letter, asked the Commission to open a separate docket to address forward-looking
9 changes. See Schedule BPL-S-4 for a full copy of that letter.

10 **Q. Is Xcel’s position on this issue contradictory?**

11 A. That appears to be the case. Xcel (and the other utilities) previously argued that going-
12 forward changes and potential disallowances should be addressed in separate dockets. Xcel
13 now seems to be changing its position and seems to imply that the two issues are
14 sufficiently related such that potential going-forward changes in a different docket should
15 weigh against potential disallowances in this proceeding.

16 **VIII. CONCLUSIONS**

17 **Q. What do you conclude?**

18 A. The Commission should find that the four utilities did not make prudent decisions in their
19 attempt to maintain gas prices in the expected range and avoid extreme prices. The
20 Commission should disallow between approximately \$70 million and \$660 million as I
21 explained in my direct testimony.

²⁸ *February 2021 Natural Gas Price Investigation*, MPUC Docket No. G-999/M-21-135, Joint Reply Comments of the Gas Utilities (July 19, 2021).

1 **Q.** **Does this conclude your surrebuttal testimony?**

2 **A.** Yes.

OAG No. 004

**State Of Minnesota
Office Of The Attorney General
Utility Information Request**

*In the Matter of the Petition by Great Plains
Natural Gas Co. for Approval of Rule
Variances to Recover High Natural Gas
Costs from February 2021* **MPUC Docket No.** G-004/M-21-235

Requested from: Great Plains

Requested By: Brian Lebens

Date of Request:
Due Date:

January 28, 2022
February 7, 2022

Reference: Nieuwsma Rebuttal at 17:19-21.

Explain the extent to which the Commission has restricted hedging, including put and call options.

Explain the extent to which the Commission has restricted the timing of implementing hedges or the ability to later adjust hedges, including put and call options.

Response:

Great Plains has not identified an options strategy that it believes provides benefit to its customers; thus, has not had meaningful conversations with the Commission regarding implementing such hedging, including put/call options or on the timing or adjustments of such.

Response by Travis Jacobson_____
Title Director_____
Department Regulatory Affairs_____
Telephone 701.222.7855_____
Email travis.jacobson@mdu.com_____

Department: Gas Supply
Telephone: 303-571-2844
Date: February 7, 2022

OAG No. 005

**State Of Minnesota
Office Of The Attorney General
Utility Information Request**

In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions **MPUC Docket No.** G-011/CI-21-611

Requested from: MERC

Requested By: Brian Lebens

Date of Request:
Due Date:

January 28, 2022
February 7, 2022

Reference: Products at locations like Ventura and Demarc.

1. Explain the extent to which the utility was aware of the financial product from the Intercontinental Exchange called a Swing Future prior to the event.
2. Explain the extent to which the utility was aware of a physical product called a Swing Strip Option prior to the event.

Response:

1. Prior to the event, MERC was aware of the Swing Futures product from the Intercontinental Exchange and was aware of its volatile liquidity. Counterparties who buy a Swing Future pay a fixed price and receive a floating daily price for a certain delivery period and delivery point. It is important to note that in order to mitigate the cost risks associated with price volatility, MERC would only enter into this type of financial transaction (Swing Future) if it also entered into a physical transaction for the same delivery period and same delivery point. As stated in MERC's May 20, 2021 Reply Comments filed in docket 21-135; "The largest drawback for this product is that it is most volatile during pending cold periods. Market participants would need to predict a price-event beforehand." In addition, there is a high probability that MERC or anyone else would miss the opportune time to layer on these hedges without hindsight, layering on these hedges when the pricing does not move, resulting in no benefit and increasing sunk costs with the fixed prices. Given these identified drawbacks, MERC has not entered into any Swing Futures.

2. Prior to the event, MERC was aware of physical products like the Swing Strip Option with FOM strike price and the Swing Strip Option with summer FOM strike price. MERC has solicited bids for these products in the past but counterparties offering these products have grown

Response By: Sarah Mead

Title: Director Gas Supply

Department: Gas Supply

Telephone: 920-433-7647

Email: Sarah.Mead@wecenergygroup.com

increasingly rare. For example, MERC requested quotes from suppliers for a Swing Strip Option with summer FOM strike price in 2017 but did not accept the offers for either a Swing Strip Option with summer FOM strike price or a Swing Strip Option with FOM strike price at Ventura with a delivery period for winter 2017/2018. MERC requested again for this winter 2021-22 however did not receive an offer to consider.

Response By: Sarah Mead
Title: Director Gas Supply
Department: Gas Supply
Telephone: 920-433-7647
Email: Sarah.Mead@wecenergygroup.com

State of Minnesota
Minnesota Office of the Attorney General

Utility Information Request

Docket Number: G-008/M-21-138 - Cost Impacts/Extreme
Weather

Date of Request: 1/28/2022

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 2/7/2022

Analyst Requesting Information: Brian Lebens

Type of Inquiry: Other

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

Request No.	
OAG 011	<p>Reference: Products at locations like Ventura and Demarc.</p> <p>a. Explain the extent to which the utility was aware of the financial product from the Intercontinental Exchange called a Swing Future prior to the event.</p> <p>b. Explain the extent to which the utility was aware of a physical product called a Swing Strip Option prior to the event.</p> <p>Response:</p> <p>CenterPoint Energy evaluated the information that was known and knowable at the time decisions were made and engaged in contracts to secure volume and per the available instruments. While CenterPoint Energy is generally aware of the range of ICE products, it has had no experience with the financially settled Swing Future contract as listed by the Intercontinental Exchange under codes “NNS” and “DES”. There is no contract listed in the catalog of products for the Chicago Mercantile Exchange or the Intercontinental Exchange that clearly associates with a Swing Strip Option for Ventura or Demarc, and CenterPoint Energy is not aware of any other physical offering with these characteristics.</p>

Response By: Paula Grizzle
Title: Director, Gas Supply Portfolio Optimization
Department: Gas Purchasing
Telephone: 713-207-3389

OAG No. 006

**State Of Minnesota
Office Of The Attorney General
Utility Information Request**

*In the Matter of the Petition by Great Plains
Natural Gas Co. for Approval of Rule
Variances to Recover High Natural Gas
Costs from February 2021* **MPUC Docket No.** G-004/M-21-235

Requested from: Great Plains

Requested By: Brian Lebens

Date of Request:
Due Date:

January 28, 2022
February 7, 2022

Reference: Products at locations like Ventura and Demarc.

1. Explain the extent to which the utility was aware of the financial product from the Intercontinental Exchange called a Swing Future prior to the event.
2. Explain the extent to which the utility was aware of a physical product called a Swing Strip Option prior to the event.

Response:

Great Plains is aware that a variety of tangential products are traded through Intercontinental Exchange. The Company has not found good cause to participate in such options trading.

Response by Travis Jacobson_____
Title Director_____
Department Regulatory Affairs_____
Telephone 701.222.7855_____
Email travis.jacobson@mdu.com_____

2/7/22, 8:50 PM

NNG Demarc Swing Future | ICE



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Energy | Natural Gas

ICE FUTURES U.S.

NNG Demarc Swing Future

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Description

A daily cash settled Exchange Futures Contract based upon the daily price published by Gas Daily for the location specified in Reference Price A.

New enhancements to our digital expiry calendar help you easily access important information for the markets you trade.

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Market Specifications

Trading Screen Product Name

NG Swing GDD Futures

Trading Screen Hub Name

NNG-Demarc

Contract Symbol

DES

Settlement Method

Cash settlement

Contract Size

2500 MMBtus

Currency

USD

2/7/22, 8:50 PM

NNG Demarc Swing Future | ICE

Minimum Price Fluctuation

The price quotation convention shall be One hundredth of a cent (\$0.0001) per MMBtu; minimum price fluctuation may vary by trade type. Please see Table in Resolution 1 to this Chapter 18.

Listing Cycle

Up to 65 consecutive daily Contract Periods

Last Trading Day

The Business Day prior to the Contract Period

Final Settlement

Reference Price A

REFERENCE PRICE A

NATURAL GAS-OTHERS (DEMARCATON)-GAS DAILY

a) Ref Price A - Description

"NATURAL GAS-OTHERS (DEMARCATON)-GAS DAILY" means that the price for a Pricing Date will be that day's Specified Price per MMBTU of natural gas for delivery on the Delivery Date, stated in U.S. Dollars, published under the heading "Daily Price Survey (\$/MMBtu): Upper Midwest: Northern, demarc: Midpoint" in the issue of Gas Daily that reports prices effective on that Pricing Date.

b) Ref Price A - Pricing Date

Each day that prices are reported for the Delivery Date

c) Ref Price A - Specified Price

Midpoint

d) Ref Price A - Pricing calendar

Gas Daily

e) Ref Price A - Delivery Date

Contract Period

Final Payment Date

The third Clearing Organization business day following the Last Trading Day

MIC Code

IFED

Clearing Venues

ICEU

Related Products

NNG DEMARC BASIS FUTURE

NNG DEMARC INDEX FUTURE

Trading Hours

2/7/22, 8:50 PM

NNG Demarc Swing Future | ICE

CITY	TRADING	PRE- OPEN
NEW YORK	7:50 PM - 6:00 PM* 19:50 - 18:00	7:40 PM 19:40
LONDON	12:50 AM - 11:00 PM* 00:50 - 23:00	12:40 AM 00:40
SINGAPORE	8:50 AM - 7:00 AM* 08:50 - 07:00	8:40 AM 08:40

*Next Day

Sunday Pre-Open 5:10 PM ET; Closed on Saturday

Codes

Clearing Admin Name

Upper MW Swing

Physical

DES

Logical

DES

GMI (FC)

AP

Symbol Code

DES

Other Energy Products

BIOFUELS

COAL

CRUDE OIL AND REFINED PRODUCTS

ELECTRICITY

EMISSIONS

LIQUIFIED NATURAL GAS

NATURAL GAS

NATURAL GAS LIQUIDS

PETROCHEMICALS

2/7/22, 8:48 PM

NNG Ventura Swing Future | ICE



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New enhancements to our digital expiry calendar help you easily access important information for the markets you trade.

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Energy | Natural Gas

ICE FUTURES U.S.

NNG Ventura Swing Future

 [Download](#)

Description

A daily cash settled Exchange Futures Contract based upon the daily price published by Gas Daily for the location specified in Reference Price A.

Market Specifications

Trading Screen Product Name

NG Swing GDD Futures

Trading Screen Hub Name

NNG-Ventura

Contract Symbol

NNS

Settlement Method

Cash settlement

Contract Size

2500 MMBtus

Currency

USD

2/7/22, 8:48 PM

NNG Ventura Swing Future | ICE

Minimum Price Fluctuation

The price quotation convention shall be One hundredth of a cent (\$0.0001) per MMBtu; minimum price fluctuation may vary by trade type. Please see Table in Resolution 1 to this Chapter 18.

Listing Cycle

Up to 65 consecutive daily Contract Periods

Last Trading Day

The Business Day prior to the Contract Period

Final Settlement

Reference Price A

REFERENCE PRICE A

NATURAL GAS-OTHERS (VENTURA)-GAS DAILY

a) Ref Price A - Description

"NATURAL GAS-OTHERS (VENTURA)-GAS DAILY" means that the price for a Pricing Date will be that day's Specified Price per MMBTU of natural gas for delivery on the Delivery Date, stated in U.S. Dollars, published under the heading "Daily Price Survey (\$/MMBtu): Upper Midwest: Northern, Ventura: Midpoint" in the issue of Gas Daily that reports prices effective on that Pricing Date.

b) Ref Price A - Pricing Date

Each day that prices are reported for the Delivery Date

c) Ref Price A - Specified Price

Midpoint

d) Ref Price A - Pricing calendar

Gas Daily

e) Ref Price A - Delivery Date

Contract Period

Final Payment Date

The third Clearing Organization business day following the Last Trading Day

MIC Code

IFED

Clearing Venues

ICEU

Related Products

NNG VENTURA BASIS FUTURE

NNG VENTURA INDEX FUTURE

NNG VENTURA FIXED PRICE FUTURE

OPTION ON NNG VENTURA FIXED PRICE FUTURE

2/7/22, 8:48 PM

NNG Ventura Swing Future | ICE

Trading Hours

CITY	TRADING	PRE- OPEN
NEW YORK	7:50 PM - 6:00 PM* 19:50 - 18:00	7:40 PM 19:40
LONDON	12:50 AM - 11:00 PM* 00:50 - 23:00	12:40 AM 00:40
SINGAPORE	8:50 AM - 7:00 AM* 08:50 - 07:00	8:40 AM 08:40

*Next Day

Sunday Pre-Open 5:10 PM ET; Closed on Saturday

Codes

Clearing Admin Name

Upper MW Swing

Physical

NNS

Logical

NNS

GMI (FC)

K9

Symbol Code

NNS

Other Energy Products

BIOFUELS

COAL

CRUDE OIL AND REFINED PRODUCTS

ELECTRICITY

EMISSIONS

LIQUIFIED NATURAL GAS

NATURAL GAS

NATURAL GAS LIQUIDS

2/7/22, 8:48 PM

NNG Ventura Swing Future | ICE

PETROCHEMICALS

July 19, 2021

—Via Electronic Filing—

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

RE: JOINT REPLY COMMENTS OF THE GAS UTILITIES
FEBRUARY 2021 NATURAL GAS PRICE INVESTIGATION
DOCKET NO. G999/CI-21-135

IN THE MATTER OF THE PETITION OF CENTERPOINT ENERGY FOR APPROVAL
OF A RECOVERY PROCESS FOR COST IMPACTS DUE TO FEBRUARY EXTREME
GAS MARKET CONDITIONS
DOCKET NO. G008/M-21-138

IN THE MATTER OF THE PETITION BY GREAT PLAINS NATURAL GAS CO., A
DIVISION OF MONTANA-DAKOTA UTILITIES CO., FOR APPROVAL OF RULE
VARIANCES TO RECOVERY HIGH NATURAL GAS COSTS FROM FEBRUARY 2021
DOCKET NO. G004/M-21-235

Dear Mr. Seuffert:

Northern States Power Company, a Minnesota corporation (Xcel Energy), CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas (CenterPoint Energy), Minnesota Energy Resources Corporation (MERC), and Great Plains Natural Gas Co. (Great Plains) (collectively the Gas Utilities or the Companies) respectfully submit these Joint Comments. As addressed more fully in each Company's filing, it seems that there is general consensus from stakeholders that some level of cost recovery should start on or about September 1, 2021, with proposals from Xcel Energy, CenterPoint and MERC to exempt certain financially vulnerable customers from the surcharge. Through this filing, the Gas Utilities request that the Commission refer the proposed disallowances proposed by the Department of Commerce (Department) and Office of Attorney General (OAG) to the Office of Administrative Hearings (OAH) for a contested case proceeding. The Gas Utilities also make some recommendations on the forward-looking policy discussions on changes that could be implemented in the future to prevent or protect against future price events.

I. REQUEST FOR CONTESTED CASE

Each utility objects to the disallowances recommended and would like the opportunity to fully rebut these significant proposed disallowances. Based on the contested material facts and the magnitude of the proposed disallowances, the Commission should refer the disallowances proposed by the Department and OAG in this matter to the OAH for a contested case proceeding. In the Joint Utilities' July 6 Comments, the Gas Utilities contemplated a prudence review with a decision no later than August 1, 2022, and we believe a contested case could be completed to allow for a Commission decision consistent with that timing.

The Gas Utilities make this request pursuant to Minn. R. 7829.1000, which provides:

If a proceeding involved contested material facts and there is a right to a hearing under statute or rule, or if the commission finds that all significant issues have not been resolved to its satisfaction, the commission shall refer the matter to the Office of Administrative Hearings for contested case proceedings, unless:

- A. all parties waive their rights to contested case proceedings and instead request informal or expedited proceedings, and the commission finds that informal or expedited proceedings would be in the public interest; or*
- B. a different procedural treatment is required by statute.*

A contested case proceeding is appropriate under the circumstances to provide due process and ensure the development of a complete factual record upon which the issues that have been raised can be resolved. As explained in each utility's individual filing, the Department and OAG's recommended disallowances involve numerous contested material facts. Additionally, Minnesota rules provide a right to a hearing related to purchased gas adjustments. Specifically, Minn. R. 7825.2920 subp. 3 provides: "The commission, on complaint or on its own motion, and after appropriate investigation, notice, *and* hearing, may issue an order to fix at current levels, discontinue, or modify an automatic adjustment provision for an individual utility." Therefore, because the Gas Utilities have a right to hearing, and a reasonable expectation that one will be afforded based on recent Commission precedent,¹ the Commission should refer the recommended disallowances for a contested case.

¹ Consistent with these rules and previously in this docket, a Commissioner proposed decision alternatives authorizing a contested case. Additionally, in a recent docket, the Commission referred a prudency-related issue on the electric fuel clause adjustment mechanism to the OAH. *See In the Matter of the Review of the July 2018-December 2019 Annual Automatic Adjustment Reports*, Order Accepting 2018-2019 Electric AAA Reports; Notice of and Order for Hearing, Docket No. E999/AA-20-171 (Sept. 16, 2020).

In making this request, the Gas Utilities are mindful that stakeholders have previously raised concerns about the time and effort a contested case requires, as well as the regulatory filings on the horizon. We appreciate these concerns and believe a contested case can be run in a way that works for all parties. Based on the relative uniformity of the proposed disallowances, and the substantial amount of review, discovery and analysis already undertaken by the stakeholders, we believe this could be a single contested case focused narrowly on the material facts at issue concerning the disallowances proposed by the Department and OAG.

II. PROPOSED NEXT STEPS FOR LONGER-TERM POLICY INVESTIGATION

Throughout the course of this proceeding, the stakeholders and Gas Utilities have raised various recommendations for forward-looking changes and considerations on a wide array of topics. We recommend the Commission open a new docket focused on policy and market changes that could be implemented on a going-forward basis to prevent or protect against future price events. While many of the recommendations will require a broader examination before changes can be implemented, the Gas Utilities propose two items that could be implemented in the short-term to provide for further review of the Gas Utilities' procurement plans:

- Should natural gas utilities “file Natural Gas Procurement Plans—without subjecting those plans to Commission approval or acceptance” to foster transparent and collaborative procurement practices as recommended by the OAG in their May 10 Comments, or alternatively, should gas purchasing practices be reviewed prior to a heating season as the Department contemplated in their May 10 Comments?
- Should the utilities meet with Commission staff and the Department each year to discuss their respective gas supply plan?

There are many other procedural and policy considerations stemming from this docket. In their May 10 Comments, Citizens Utility Board and Energy Cents Coalition started a list of policy questions that can serve as a good starting point to collect the policy ideas suggested in this docket. The Gas Utilities continue to recommend the Commission retain a third-party facilitator to help the Commission and stakeholders—both those already participating in this docket as well as those typically outside the Minnesota regulatory process—organize these ideas, help structure stakeholder discussions, and develop policy recommendations for the Commission's ultimate determination. The Gas Utilities are willing to help defray the costs of a third-party facilitator if this is of interest to the Commission.

We appreciate the opportunity to provide this information to the Commission. We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list.

Sincerely,

/s/

LISA PETERSON
XCEL ENERGY
MANAGER, REGULATORY ANALYSIS

/s/

AMBER LEE
CENTERPOINT ENERGY
DIRECTOR, REGULATORY AFFAIRS

/s/

TRAVIS JACOBSON
GREAT PLAINS NATURAL GAS CO.
DIRECTOR OF REGULATORY AFFAIRS

/s/

RICHARD STASIK
MINNESOTA ENERGY RESOURCES CORP.
DIRECTOR-STATE REGULATORY AFFAIRS

c: Service List

CERTIFICATE OF SERVICE

I, Crystal Syvertsen, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

**Docket Nos. G999/CI-21-135
G008/M-21-138
G004/M-21-235**

Dated this 19th day of July 2021

/s/

Crystal Syvertsen
Regulatory Administrator

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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_21-135_Official
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Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-135_Official

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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_21-135_Official
Amy	Liberkowsky	amy.a.liberkowsky@xcenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-135_Official
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_21-135_Official
Kavita	Maini	kmmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-135_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7 h St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-135_Official
Sarah	Mead	sarah.mead@wecenergygroup.com	MERC	N/A	Electronic Service	No	OFF_SL_21-135_Official
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Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-135_Official
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-135_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-135_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-135_Official
Samantha	Norris	saman.hanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-135_Official
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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_21-135_Official
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-135_Official
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_21-135_Official
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_21-135_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-135_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_21-135_Official
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_21-135_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-135_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-135_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-135_Official
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Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-135_Official
Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group	605 Highway 169 N Ste 1200 Plymouth, MN 55441	Electronic Service	No	OFF_SL_21-135_Official
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-135_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official

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James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138
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_21-138_Official Service List G008-M-21- 138
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138
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_21-138_Official Service List G008-M-21- 138
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138
Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4 h St Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138
Erica	Larson	erica.larson@centerpointenergy.com	CenterPoint Energy	505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_21-138_Official Service List G008-M-21- 138
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7 h St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138
Samantha	Norris	samanhanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138
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_21-138_Official Service List G008-M-21- 138
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-138_Official Service List G008-M-21- 138

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James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-138_Official Service List G008-M-21- 138

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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_21-235_Official
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_21-235_Official
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4 h St Bismarck, ND 58501	Electronic Service	Yes	OFF_SL_21-235_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-235_Official
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_21-235_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-235_Official
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-235_Official



The Office of
Minnesota Attorney General Keith Ellison
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February 11, 2022

The Honorable Jessica Palmer-Denig
The Honorable Barbara Case
Administrative Law Judges
Office of Administrative Hearings
600 North Robert Street
St. Paul, MN 55101

Re: *In the Matter of the Petitions for Recovery of Certain Gas Costs*
OAHDocket No. 71-2500-37763

***In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process
for Cost Impacts Due to February Extreme Gas Market Conditions***
MPUC Docket No.: G-008/M-21-138

***In the Matter of the Petition by Great Plains Natural Gas Co. for Approval of Rule
Variances to Recover High Natural Gas Costs from February 2021***
MPUC Docket No.: G-004/M-21-235

***In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy to
Recover February 2021 Natural Gas Costs***
MPUC Docket No. G-002/CI-21-610

***In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval
of a Recovery Process for Cost Impacts***
MPUC Docket No.: G-011/CI-21-611

Dear Judges Palmer-Denig and Case:

Enclosed and e-filed in the above-referenced matter please find Surrebuttal Testimony and Schedules of the Office of the Attorney General—Residential Utilities Division Witness Brian Lebens.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ Joseph C. Meyer
JOSEPH C. MEYER
Manager, Residential Utilities Division

(651) 757-1433 (Voice)
(651) 296-9663 (Fax)
joseph.meyer@ag.state.mn.us

Enclosure

CERTIFICATE OF SERVICE

Re:*In the Matter of the Petitions for Recovery of Certain Gas Costs*
OAH Docket No. 71-2500-37763

In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions
MPUC Docket No.: G-008/M-21-138

In the Matter of the Petition by Great Plains Natural Gas Co. for Approval of Rule Variances to Recover High Natural Gas Costs from February 2021
MPUC Docket No.: G-004/M-21-235

In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy to Recover February 2021 Natural Gas Costs
MPUC Docket No. G-002/CI-21-610

In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts
MPUC Docket No.: G-011/CI-21-611

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, DEBORAH POOLE, hereby certify that on the 11th day of February 2022, I e-filed with eDockets the *Surrebuttal Testimony and Schedules of the Office of the Attorney General—Residential Utilities Division Witness Brian Lebens* and served a true and correct copy of the same upon all parties listed on the attached service list as receiving Electronic Service by e-mail and/or electronic submission.

/s/ Deborah Poole
DEBORAH POOLE

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jorge	Alonso	jorge.alonso@state.mn.us	Public Utilities Commission	1217 h Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official CC Service List
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service 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_21-138_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-138_Official CC Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55102198	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-138_Official CC Service List

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Max	Kieley	max.kieley@ag.state.mn.us	Office of the Attorney General-RUD	1400 Town Square Tower 445 Minnesota Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official CC Service 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_21-138_Official CC Service List
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Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-138_Official CC Service List
Annie	Levenson Falk	annief@cubeinnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7 h St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-138_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David	Moeller	dmoeller@allstate.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stbel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Samantha	Norris	saman.hanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-138_Official CC Service List
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Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-138_Official CC Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-138_Official CC Service List

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Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-138_Official CC Service List
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC 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_21-138_Official CC Service List
Kristin	Stashy	kstashty@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-138_Official CC Service List
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Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-235_Official CC Service List
Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings	600 N. Robert St. St. Paul, Mn. 55101	Electronic Service	Yes	OFF_SL_21-235_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-235_Official CC Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-235_Official CC Service List
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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_21-235_Official CC Service List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4 h St Bismarck, ND 58501	Electronic Service	Yes	OFF_SL_21-235_Official CC Service List
Max	Kieley	max.kieley@ag.state.mn.us	Office of the Attorney General-RUD	1400 Town Square Tower 445 Minnesota Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-235_Official CC Service List
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official CC Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-235_Official CC Service List

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Andrew	Moratzka	andrew.moratzka@stbel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-235__Official CC 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	Yes	OFF_SL_21-235__Official CC Service List
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_21-235__Official CC Service List
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	1217 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-235__Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_21-235__Official CC Service List
Richard	Stasik	richard.stasik@wecenergypgroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-235__Official CC Service List

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James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official CC Service List
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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_21-610_Official CC Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Erica	Larson	erica.larson@centerpointenergy.com	CenterPoint Energy	505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-610_Official CC Service List
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_21-610_Official CC Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7 h St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-610_Official CC Service List
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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_21-610_Official CC Service List
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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_21-611_Official CC Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-611_Official CC Service List
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Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-611__Official CC Service List
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_21-611__Official CC Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7 h St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-611__Official CC Service List
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-611_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-611_Official CC Service List
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