

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS
FOR THE PUBLIC UTILITIES COMMISSION

In the Matter of the Application by
CenterPoint Energy Resources Corp., d/b/a
CenterPoint Energy Minnesota Gas for
Authority to Increase Natural Gas Rates in
Minnesota

**FINDINGS OF FACT,
CONCLUSIONS OF LAW,
AND RECOMMENDATION TO
APPROVE SETTLEMENT**

This matter is pending before Administrative Law Judge Ann C. O'Reilly of the Minnesota Office of Administrative Hearings (OAH) pursuant to a Notice of and Order for Hearing issued by the Minnesota Public Utilities Commission (PUC or Commission) on December 30, 2021.

Eric F. Swanson, Elizabeth H. Schmiesing, and Joseph M. Windler, Winthrop & Weinstine, P.A., appear on behalf of the Applicant, CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CenterPoint or Company).

Peter Scholtz and Kristin Berkland appear on behalf of the Office of the Attorney General--Residential Utilities Division (OAG).

Richard Dornfeld and Katherine Hinderlie appear on behalf of the Minnesota Department of Commerce, Division of Energy Resources (DOC).

Joseph Sathe and James Strommen, Kennedy & Graven, Chartered, appear on behalf of the Suburban Rate Authority (SRA).

Amelia Vohs appears on behalf of the Clean Energy Organizations (CEOs).

Jorge Alonso and Jason Bonnett appear on behalf of the Minnesota Public Utilities Commission (Commission).

The parties in this proceeding are CenterPoint, the DOC, the OAG, the SRA, and the CEOs (collectively, the Parties).

Procedural Summary

Public hearings were held in Golden Valley and Mankato, Minnesota, on February 22 and 24, 2022, respectively. Two virtual public hearings were held on

March 1, 2022, using WebEx technology. Members of the public were able to join the virtual public hearing via an internet or telephone connection. Written comments from members of the public were received through April 11, 2022.

The evidentiary hearing was scheduled to begin on April 6, 2022, and continue through April 8, 2022. On February 11, 2022, the Parties met for initial settlement discussions. On February 28, 2022, the Parties engaged in formal mediation conducted by Kelly M. Anderson of the OAH. Through that mediation and subsequent discussions, the Parties resolved all issues in this proceeding and set forth the terms of their agreement in a Settlement, filed on March 14, 2022, and attached hereto.

The Administrative Law Judge suspended the evidentiary hearing and convened a settlement conference via Microsoft Teams on April 1, 2022, to confirm all parties' agreement with the settlement reached. During the settlement conference, the Parties responded to questions from the Administrative Law Judge and from Commission staff concerning the Settlement. In addition, the Parties' hearing exhibits, consisting of Direct Testimony, Work Papers, attachments, appendices, schedules, and other supporting materials, were received into the record.

When all parties to a utility rate case reach a settlement, the Administrative Law Judge must present the settlement to the Commission for its consideration.¹ Accordingly, the Administrative Law Judge cancelled the evidentiary hearing, excused the Parties from any further filings, and returns this proceeding to the Commission together with her recommendation to approve the Settlement.

STATEMENT OF THE ISSUES²

1. Whether the test year revenue increase sought by the Company is reasonable or will result in unreasonable or excessive earnings.
2. Whether the rate design proposed by the Company is reasonable.
3. Whether the Company's proposed capital structure and return-on-equity are reasonable.
4. Whether the base cost of gas proposed in *In the Matter of CenterPoint Energy Resources Corporation's Filing to Establish a New Base Gas Cost Filing (PGA Zero-Out) for Interim Rates in CenterPoint Energy's General Rate Filing*, Docket Nos. G-008/GR-21-435 and G-008/MR-21-436, needs to be updated.
5. Whether it is appropriate to use the proposed hypothetical capital structure or whether an alternative capital structure should be adopted.
6. Whether there are any significant changes from the last rate case.

¹ Minn. Stat. § 216B.16, subd. 1a(b) (2020).

² Notice of and Order for Hearing at 2 (Dec. 30, 2021) (eDocket No. 202112-181087-02).

7. Whether CenterPoint's income tax rider request should be approved.
8. Whether the calculations for Minnesota-based personnel or full-time equivalents are adequate.

FINDINGS OF FACT

I. The Parties

1. CenterPoint is an operating division of CenterPoint Energy Resources Corp. (CERC), a wholly owned subsidiary of CenterPoint Energy, Inc. (CNP), a publicly traded company.

2. The CEOs are comprised of Fresh Energy and the Minnesota Center for Environmental Advocacy (MCEA). Fresh Energy is an independent energy policy nonprofit organization working to promote a clean energy economy. MCEA is a nonprofit environmental organization that seeks to advance the pursuit of environmentally sustainable energy policies. Many of the members of these organizations are CenterPoint Energy ratepayers.³

3. The SRA is a municipal joint powers association. Most of the organization's members are municipalities in the suburban Twin Cities area that receive natural gas service from CenterPoint Energy. The SRA acts on behalf of its members and their residents and businesses.⁴

4. The OAG represents the interests of residential and small business utility consumers through participation in matters before the Commission involving utility rates and adequacy of utility services.⁵

5. The DOC is a state agency charged by the legislature with enforcing Minnesota Statutes chapters 216A, 216B, and 237, and represents the interests of all ratepayers in related proceedings.⁶

II. Procedural Background

6. The Company initiated this proceeding on November 1, 2021, seeking authority to raise its rates to increase its revenues by \$67.1 million, or 6.5 percent, annually.⁷

³ Petition to Intervene of Clean Energy Organizations (Jan. 12, 2022) (eDocket No. 20221-181437-01).

⁴ Petition to Intervene of the Suburban Rate Authority (Jan. 13, 2022) (eDocket No. 20221-181459-01).

⁵ Minn. Stat. § 8.33, subd. 2 (2020).

⁶ Minn. Stat. § 216A.07, subd. 2–4 (2020); Minn. R. 7829.0800, subp. 3 (2019).

⁷ Notice of and Order for Hearing at 1 (Dec. 30, 2021) (eDocket No. 202112-181087-02).

7. The Commission issued a Notice of Comment Period on Completeness and Procedures on November 3, 2021.⁸ The DOC filed comments on November 9, 2021.⁹ The OAG filed comments on November 10, 2021,¹⁰ and the Company filed its reply on November 15, 2021.¹¹

8. The Commission issued a Notice of and Order for Hearing on December 30, 2021, which, among other things, referred the case to the OAH for contested case proceedings.¹²

9. Also on December 30, 2021, the Commission issued two orders: one which accepted the Company's rate case filing as substantially complete and suspended the Company's proposed rates,¹³ and a second that established interim rates.¹⁴

10. A prehearing status and scheduling conference was held on January 13, 2022, and the Administrative Law Judge issued the First Prehearing Order on January 19, 2022. The First Prehearing Order set forth the timeline and process for the proceeding.¹⁵ On February 4, 2022, the Administrative Law Judge issued her Amended First Prehearing Order, including more specific information regarding the public hearings to be held in this matter.¹⁶

11. On January 12, 2022, CEOs petitioned to intervene.¹⁷ On January 13, 2022, the SRA petitioned to intervene.¹⁸ Both petitions were granted.¹⁹

12. On February 7, 2022, DOC, OAG, and SRA filed Direct Testimony²⁰ in this proceeding and on February 8, 2022, CEOs filed Direct Testimony,²¹ with no party objecting to the delayed filing.

⁸ Notice of Comment Period on Completeness and Procedures (Nov. 3, 2021) (eDocket No. 202111-179465-01).

⁹ Comments of the Minnesota Department of Commerce, Division of Energy Resources (Nov. 9, 2021) (eDocket No. 202111-179604-01).

¹⁰ Comments of the Office of the Attorney General--Residential Utilities Division (Nov. 10, 2021) (eDocket No. 202111-179672-01).

¹¹ Reply to November 9, 2021, Department of Commerce Comments and the November 10, 2021, Office of the Attorney General Comments (Nov. 15, 2021) (eDocket No. 202111-179788-01).

¹² Notice of and Order for Hearing (Dec. 30, 2021) (eDocket No. 202112-181087-02).

¹³ Order Accepting Filing and Suspending Rates (Dec. 30, 2021) (eDocket No. 202112-181087-01).

¹⁴ Order Setting Interim Rates (Dec. 30, 2021) (eDocket No. 202112-181087-03).

¹⁵ First Prehearing Order (Jan. 19, 2022) (eDocket No. 20221-181722-01).

¹⁶ Amended First Prehearing Order (Feb. 4, 2022) (eDocket No. 20222-182438-01).

¹⁷ Petition to Intervene of Clean Energy Organizations (Jan. 12, 2022) (eDocket No. 20221-181437-01).

¹⁸ Petition to Intervene of the Suburban Rate Authority (Jan. 13, 2022) (eDocket No. 20221-181459-01).

¹⁹ First Prehearing Order (Jan. 19, 2022) (eDocket No. 20221-181722-01).

²⁰ SRA direct testimony (Feb. 7) (eDocket Nos. 20222-182522-01 to 02); DOC direct testimony (Feb. 7) (eDocket Nos. 20222-18517-01 to 04, 20222-182512-01 to 10, 20222-182511-01 to 05, 20222-182509-01 to 10; OAG direct testimony (Feb. 7) (eDocket Nos. 20222-182506-01 to 03).

²¹ CEOs direct testimony (Feb. 8) (eDocket Nos. 20222-182526-01 to 03, 20222-182525-01 to 06, 20222-182526-01 to 03, 2022-182525-01 to 06).

13. On February 11, 2022, the Parties met informally to discuss potential settlement or mediation of this matter, agreed to pursue mediation, and CenterPoint submitted a Request for Mediation to the OAH.²²

14. Kelly M. Anderson, a staff attorney at the OAH, conducted mediation of this matter on February 28, 2022. At the mediation, the Parties reached an agreement in principle to resolve all issues in this proceeding.²³

15. Public hearings were held in Golden Valley and Mankato, Minnesota on February 22 and 24, 2022, respectively, and two virtual public hearings were held on March 1, 2022. Members of the public could attend the virtual hearings either through internet connection on a computer, tablet, or smartphone, or by telephone.²⁴

16. On March 7, 2022, the Parties sent correspondence to the Administrative Law Judge informing her that an agreement had been reached in principle to resolve all issues and a formal settlement document would be forthcoming. In light of the agreement, none of the Parties filed Rebuttal Testimony.²⁵

17. Following the mediation, the Parties continued discussions, exchanged information, and memorialized the terms of their agreement in a Settlement, filed on March 14, 2022.²⁶

18. On March 29, 2022, the Parties filed a joint Proposed Findings of Fact, Conclusions of Law and Recommendation to Approve the Settlement.²⁷

19. On April 1, 2022, the Administrative Law Judge held a hearing, via Microsoft Teams, to receive the Parties' prefiled testimony, work papers, attachments, appendices, schedules, and other supporting materials into the record and to allow the Administrative Law Judge and Commission Staff to ask questions of the Parties regarding the Settlement.

III. Overview of the Company's Application to Increase Rates

20. CenterPoint provides natural gas sales, transportation, and storage services to its Minnesota customers. The Company serves approximately 260 communities in 74 counties in Minnesota. The Company has approximately 800,000 residential customers and 84,000 commercial and industrial customers.²⁸

²² Request for Mediation (Feb. 11, 2022) (eDocket No. 20222-182700-01).

²³ Settlement Document (Mar. 14, 2022) (eDocket No. 20223-183756-06).

²⁴ See *generally*, Hearing Transcripts (Hrg. Tr.)

²⁵ Letter to Administrative Law Judge Ann O'Reilly from Eric Swanson (Mar. 7, 2022) (eDocket No. 20223-183512-01).

²⁶ Settlement Document (Mar. 14, 2022) (eDocket No. 20223-183756-06).

²⁷ Proposed Findings of Fact, Conclusions of Law, and Recommendation to Accept Settlement (eDocket No. 202236-184228-01 to 03).

²⁸ CPE Exhibit (Ex.) 1 at 2 (Singleton Direct).

21. The Company initiated this proceeding on November 1, 2021, seeking authority to raise its rates to increase its revenues by \$67.1 million, or 6.5 percent, annually, based on a test year of calendar year 2022.²⁹ On January 1, 2022, the Company implemented an interim rate increase as it originally proposed except that the rate increase for residential customers was limited to no more than 3.9 percent, resulting in an overall interim rate increase of 4.1 percent.³⁰

22. The Company explained that the primary financial reasons for its rate request are the need for “increased capital investment and associated cost of service increases (including return, depreciation expense, and property taxes), and increased operations and maintenance expense.”³¹

23. The Company’s application proposed to increase rates for every customer class, as follows:³²

Rate Class	Operating Revenues at Current Rates	Proposed Revenue Change	Percent Change
Residential	\$617,954,019	\$40,473,726	6.5%
C&I – Rate A	\$21,735,086	\$3,873,845	17.8%
C&I – Rate B	\$46,480,851	\$4,754,220	10.2%
C&I – Rate C Sales	\$244,199,818	\$10,221,935	4.2%
C&I – Rate C Transport	\$2,215,631	\$290,885	13.1%
Small Dual Fuel – A Sales	\$19,884,874	\$1,741,600	8.8%
Small Dual Fuel – A Transport	\$555,987	\$152,571	27.4%
Small Dual Fuel – B Sales	\$12,628,982	\$1,007,299	8.0%
Small Dual Fuel – B Transport	\$658,044	\$183,313	27.9%
Large Firm – Sales	\$6,065,792	\$403,605	6.7%
Large Firm – Transport	\$15,376,929	\$1,058,440	6.9%
Large Dual Fuel – Sales	\$30,270,019	\$1,218,045	4.0%
Large Dual Fuel – Transport	\$11,916,042	\$1,686,279	14.2%
Total Company	\$1,029,942,074	\$67,065,763	6.5%

24. The Company issues each customer a monthly bill that includes both a fixed monthly charge, called the Basic Charge, and a charge for each unit of gas (therm) consumed that month, called the Delivery Charge. The Company proposed increases for each customer class to the Basic Charge, as follows:

²⁹ Notice of and Order for Hearing at 1 (Dec. 30, 2021) (eDocket No. 202112-181087-02).

³⁰ Order Setting Interim Rates at 5 (Dec. 30, 2021) (eDocket No. 202112-181087-03); Compliance Filing For Interim Rates, Sched. IR-13 (Dec. 7, 2021) (eDocket No. 202112-180492-01).

³¹ CPE Ex. 1 at 21-22 (Singleton Direct).

³² CPE Ex. 14 at 57 (Zarumba Direct).

Rate Class	Current Monthly Basic Charge	Proposed Basic Monthly Charge
Residential	\$9.50	\$11.00
C&I – Rate A	\$15.00	\$17.50
C&I – Rate B	\$21.00	\$26.00
C&I – Rate C Sales	\$55.00	\$65.00
C&I – Rate C Transport	\$155.00	\$165.00
Small Dual Fuel – A Sales	\$60.00	\$80.00
Small Dual Fuel – A Transport	\$160.00	\$180.00
Small Dual Fuel – B Sales	\$95.00	\$125.00
Small Dual Fuel – B Transport	\$195.00	\$225.00
Large Firm – Sales	\$1,050.00	\$1,250.00
Large Firm – Transport	\$1,150.00	\$1,350.00
Large Dual Fuel – Sales	\$1,050.00	\$1,250.00
Large Dual Fuel – Transport	\$1,150.00	\$1,350.00

25. The chart below shows the Company's average monthly bill by customer class, calculated using its rates as of December 2021 and its proposed final rates.³³

Rate Type (usage in therms)	Average monthly usage in therms	Average monthly bill: current rates	Average monthly bill: proposed
Residential	74	\$68	\$72
Commercial/Industrial			
- up to 1,499/year	67	\$69	\$80
- 1,500 to 4,999/year	255	\$210	\$230
- 5,000 or more/year	1,440	\$1,096	\$1,136
Small Volume Dual Fuel			
- up to 119,999/year	3,971	\$2,310	\$2,482
- 120,000 or more/year	15,567	\$8,903	\$9,490
Large Volume Dual Fuel	42,091	\$23,466	\$24,403
Large General Firm Sales Service	41,602	\$23,085	\$24,480

IV. Public Comments

A. Comments Made at Public Hearings

26. Twenty-four members of the public provided oral comments or asked questions at the public hearings in this matter – eight in Golden Valley, four in Mankato,

³³ See CPE Ex. 17 (General Rate Petition Summary).

and 13 during the virtual public hearings.³⁴ All commenters opposed the rate increase request.³⁵

B. Written Comments

27. In addition to comments made at the public hearings, the Commission has received approximately 129 written comments regarding the Company's rate increase request, all but two of which opposed a rate increase.

C. Summary of Public Comments

28. The oral and written public comments fell into four general categories: (1) comments arguing that rate increases would be unfair, unnecessary, unreasonable, or excessive; (2) comments urging the Commission to consider environmental issues, renewable energies, and climate change; (3) comments regarding the recovery of gas costs related to the February 2021 cold weather event; and (4) comments opposing rate increases due to current corporate revenues, recent shareholder profits, and high executive compensation.

29. An overwhelming number of commenters (nearly all) expressed disapproval of any rate increase.³⁶ Most of these comments asserted that CenterPoint's requested rate increase is unfair, unnecessary, unreasonable, or excessive. These commenters asserted that: (1) rate hikes are too frequent and unnecessary, given CenterPoint's reported revenues and profits; (2) the Company's rate increase was the result of corporate "greed" as opposed to the need to improve services and reliability for customers; (3) inflation, the lingering effects of the Covid-19 Pandemic, and other increases in gas and utility costs, were already stretching the budgets of low and middle-income Minnesotans to the point where many ratepayers will be unable to absorb these additional costs; (4) the rate increases will be particularly taxing on fixed-income residential customers; (5) the Company's requested increase and interim rates did not appear accurate when many households are already seeing increases of up to 50 percent on their bills (due to gas cost increases); (6) the proposed rate increase would have a "double-whammy" effect with the increases in gas costs related to the February 2021 cold weather event; (7) given the lack of choice customers have for public gas utilities, that CenterPoint appears to be exploiting its "monopoly" to favor shareholder profits over customer needs; and (8) it is unfair for the Commission to impose interim rate increases when ratepayers do not have the opportunity to review or oppose those increases.³⁷

³⁴ See Hrg. Tr. Vol. 1 through IV.

³⁵ *Id.*

³⁶ Only two commenters expressed support for the Company: Amelia Kroeger (eDocket No. 20222-183019-01) (stating that she is in favor of increases if the increase ensures reliability and efficient gas delivery to ratepayers); CG Brand (eDocket No. 20223-183362-01) (expressing gratitude for budget billing and low-income energy assistance; questioning use of cartoon image on billing statements announcing proposed rate increase).

³⁷ Osman Moallim (Hrg. Tr. at Vol. I, 26-29); Roger Kloster (Hrg. Tr. at Vol I, 29-33); Thomas Garside (Hrg. Tr. at Vol I, 40-46); Colt Anderson (Hrg. Tr. at Vol. I, 46-52); Linda Kennedy (Hrg. Tr. at Vol. II, 24-33); Roger Elgersma (Hrg. Tr. at Vol. II, 34-47) (eDocket No. 20224-185031-01) (also asserting "deceit" in the

30. The second general group of commenters expressed concern about the environmental effects of energy creation and the societal costs of climate change. These commenters urged the Commission to work toward reducing the dependence on fossil fuels, as opposed to rewarding companies, by increasing rates, that continue to encourage energy use. Several of these commenters expressed disapproval of CenterPoint marketing campaigns that urge or incentivize the use of gas appliances. According to these commenters, ratepayers should not pay to fund advertising campaigns that work against decreasing the dependence on fossil fuels.³⁸

answers to questions provided by CenterPoint staff at the public hearings); Noel Sorenson (Hrg. Tr. at Vol. II, 48-51); Steven Hendrickson (Hrg. Tr. at Vol. III, 33-39); Erin Rea (Hrg. Tr. at Vol. III, 40-45); Allison Koch (Hrg. Tr. at Vol. III, 46-61); Brian Blackmore (Hrg. Tr. at Vol. III, 62-73); Brenda Short (Hrg. Tr. at Vol. IV, 55-58); Sheryl Danielson (Hrg. Tr. at Vol. IV, 59-60); Leslie and Alain Frecon (eDocket No. 20224-184684-01); Carole Kulak (eDocket No. 20224-184684-01); Joel Prest (eDocket No. 20224-184684-01); G. Woodgate (eDocket No. 20224-184684-01); Warped Weaver (eDocket No. 20224-184703-01); Steph Skeba (eDocket No. 20224-184472-01); Brian Landwehr (eDocket No. 20223-183945-01); Lois and Steve Parker (eDocket No. 20223-183945-01); Nicki Hiber (eDocket No. 20223-183945-01); Mary Brown (eDocket No. 20223-183945-01); Christopher Haley (eDocket No. 20223-183945-01); Sri Dandibhotla (eDocket No. 20223-183945-01); Jennifer Nyberg (eDocket No. 20223-183650-01); N. Casada (eDocket No. 20223-186542-01); Lori Johnson (eDocket No. 20223-186542-01); Pamela Barney (eDocket No. 20223-183362-01); Myrna Maikkula (eDocket No. 20223-183362-01); Margaret and Jeff Paulson (eDocket No. 20223-183362-01); Joann Ramig (eDocket No. 20223-183362-01); Sharon Goetzke (eDocket No. 20222-183169-01); Kay Brandt (eDocket Nos. 20222-183079-01; 20222-183019-01); Marjorie and Richard Weitzel (eDocket Nos. 20222-183079-01; 20222-182906-01); Richard Schmidt (eDocket No. 20222-183079-01); John Honsa (eDocket Nos. 20222-183019-01; 20222-182906-01); Sandy Knobel (eDocket No. 20222-183019-01); Cynthia Mohnen Brick (eDocket No. 20222-183019-01); Kurt Kragness (eDocket No. 20222-183019-01); Duane Gebers (eDocket No. 20222-182906-01) (also expressing criticism of Joe Biden); Nancy King (eDocket No. 20222-182906-01); Jeremy Maslowski (eDocket No. 20222-182906-01); Jacqueline Galle (eDocket Nos. 20222-182983-01; 20222-192918-01) (Also expressing criticism of CenterPoint's customer service and cost of repairs billed to her.); Ryan Sollinger (eDocket No. 20222-183019-01); Rick and Linda Johnson (eDocket No. 20222-182906-01); Zach Hillesland (eDocket No. 20222-182906-01); Lori Johnson (eDocket No. 20222-192918-01); Andre Guirard (eDocket No. 20222-192918-01); Sharon Maceredth (eDocket No. 20222-192918-01); Breckyn Avery (eDocket No. 20222-192918-01); Angelika Krohn (eDocket No. 20222-182718-01); Nancy Anderson (eDocket No. 20222-182718-01); Kristen Lunde (eDocket No. 20222-182718-01); Huy Nguyen (eDocket No. 20222-182718-01); David Wenberg (eDocket No. 20222-182718-01); Patty Lindemann (eDocket No. 20222-182718-01); Kou Yang (eDocket No. 20222-182718-01); Dan Neubert (eDocket No. 20222-182718-01); Jessica Richter (eDocket No. 20222-182741-01); Barbara Alt (eDocket No. 20222-182689-01); Adam Rislund (eDocket No. 20222-182619-01); Arne Hesson (eDocket No. 20222-182548-01); Carla Love (eDocket No. 20222-182474-01); William Gulker (eDocket No. 20222-182380-01); Becky Markkanen (eDocket No. 20222-182331-01); Mary Jean Bilski (eDocket No. 20221-182058-01); Amy Bedeaux (eDocket No. 20221-181997-01); Roberta Sucki (eDocket No. 20221-182002-01); Tom Barrett (eDocket No. 202112-180696-01); Nathan Redding (eDocket No. 20221-182196-01) (also noting that high gas costs will force him to lay off workers from his small business); Christopher Nygaard 2 (eDocket No. 20222-182718-01) (also asserting that the rate increases for the company have a disproportionate effect on Minnesotans); Mark Ladd (eDocket No. 20222-182718-01) (also advocating for CenterPoint to cut back on expenses to reduce the increase for ratepayers); Sam Donaldson (eDocket No. 20222-192918-01) (opposing rate increase but specifically addressing a gas meter leak and charges associated with that issue); Chris and Mehri McLaughlin (eDocket No. 20224-185387-01) (asserting lack of transparency by the Company, confusing utility bills, and Company failure to address billing issues); Dennis Roelfsema (eDocket No. 20225-185510-01); Amanda Hinson (eDocket No. 20225-185643-01)

³⁸ Chris Saffert (eDocket No. 20224-184684-01); Mary Brown (eDocket No. 20223-183945-01); Jean Abbott (eDocket No. 20223-186542-01); Pamela Barney (eDocket No. 20223-183362-01); Bruce Goff (eDocket

31. A subset of the commenters addressing environmental matters was “Fresh Energy,” a member of the intervenor CEOs.³⁹ A group of 37 members of Fresh Energy submitted written comments. These comments urged the Commission to: (1) require CenterPoint to reduce its investment in new gas line extensions; (2) consider the future of natural gas before approving rates that include investments in updating current systems; (3) require CenterPoint to incorporate hydrogen pilots into its regulatory framework; and (4) encourage utility companies to invest more in sustainable energies so as to combat the negative effects of climate change.⁴⁰

32. There were two commenters who urged the Commission to reduce the basic charge for residential and small commercial/industrial customers and substantially increase the per-unit fuel charge for high-volume customers like large commercial/industrial users. According to these commenters, the Company’s proposed rate structure results in a lower per-unit monthly bill for high-volume consumers, which is contrary to the policy of encouraging energy conservation. Such a rate structure does not incentivize large greenhouse gas emitters to reduce their high gas usage.⁴¹

33. The third topic of comments received involve the recovery of gas costs related to the February 2021 cold weather event, which is being addressed in other Commission dockets. While commenters were advised at each public hearing that the cost-of-gas related to the February 2021 cold weather event was not a subject of this docket, there were still a number of comments received regarding the recovery of gas costs. Those comments argued that the increase in gas costs related to the February 2021 cold weather event should not be assumed by ratepayers but, instead, should be absorbed by the shareholders. These commenters argued that the increase in gas costs during that event were the result of mismanagement of risk or other malfeasance by Company executives and staff. The commenters assert that the Company should absorb these costs by reducing operating costs and executive compensation, rather than passing on the costs to ratepayers. According to several of these commenters, company executives should bear the brunt of the excessive gas costs because they were the cause of, or in control of the decisions that resulted in, the Company having to pay such high

No. 20223-183362-01); Susan Dragsten (eDocket No. 20223-183362-01); Satish Desai (eDocket No. 20223-183362-01); Kevin Miller (eDocket No. 20223-183362-01); Remy Eisendrath (eDocket No. 20222-183138-01); Roberta Sucki (eDocket No. 20221-182002-01); Kyle Anthony Johnson (eDocket No. 20222-182718-01) (also encouraging better public engagement and transparency in rate-making matters); Elizabeth Porter (eDocket No. 20222-183079-01).

³⁹ Fresh Energy notes that although its individual members submitted public comments, Fresh Energy, as a member of the intervening party, the CEOs, continues to support the settlement agreement reached in this case. See Letter to Ann O’Reilly from Amelia Vohs, Clean Energy Organizations, dated April 14, 2022) (eDocket No. 20224-18474-01).

⁴⁰ Comments of Fresh Energy (Jeff Curtes, Kate Wolford, Theresa Zeman, Andrea Siegel, Greg Jason, Kay Schoenwetter, Dennis Lund, Melissa Winn, Jason Astleford, Donna Seabloom, Nan Stevenson, Jo Olson, Stefanie Hollmichel, Caroline Sevilla, Eileen Anderson, Sam Benson, Katheryn Thepkema, Scott Firman, Pam McKenna, Douglas Mensing, Leigh Onkka, Christine Popowski, Robert Kriesel, Jean Ross, Victoria Thompson, Brad Snyder, Nancy Dennis, Elaine Ito, Bryan Kapustka, Dirk Durant, Terri Kaye, Grace Thumser, Colleen Joe O’Meara, Emily Newhall, Kelsey Murphy, Greg Flohaug, Kelsey Brodt) (eDocket No. 20224-184618-01).

⁴¹ Brian Tang (eDocket No. 20223-184199-01); Larry Yockim (eComment No. 20223-183651-01) (noting the high use of natural gas by large corporations).

gas prices. Adding these costs to another rate increase would unfairly impact ratepayers, particularly residential customers.⁴²

34. The final general category of comments involved opposition to rate increases because of CenterPoint's reports of high earnings and profits, as well as "excessive" compensation paid to corporate executives. These commenters question why the Company is seeking to increase costs to ratepayers when the Company is reporting historic revenues. They assert that rate increases will only serve to "line the pockets" of executives who are already receiving millions of dollars per year of compensation – far more than the household incomes of average ratepayers. According to these commenters, executive compensation at CenterPoint was in excess of \$41 million last year alone. This group of commenters assert that ratepayers should not be the "first resource to tap" when the company wants to pay its executives or shareholders more money. Instead, executives should be taking pay-cuts and the Company should be cutting costs, rather than increasing rates. They argue that, if fewer executive bonuses and reasonable compensation were paid, the Company would not need to increase rates. Several of these commenters deemed the rate increase as an example of corporate "greed" and the "exploitation of the poor and middle class." Other commenters questioned what CenterPoint will do with the extra \$64 million the Company is seeking and if those funds will actually benefit the average ratepayer.⁴³

V. Legal Standards

35. The Commission must set rates that are just and reasonable:

⁴² Carol Carlson (Hrg. Tr. at Vol. I, 34-37, 55); Thomas Garside (Hrg. Tr. at Vol. I, 40-46); Colt Anderson (Hrg. Tr. at Vol. I, 46-52); Roger Elgersma (Hrg. Tr. at Vol. II, 34-47) (eDocket No. 20224-185031-01) (also asserting "deceit" in the answers to questions provided by CenterPoint staff at the public hearings); Michael Fadlovich (eDocket No. 20223-183945-01); Sri Dandibhotla (eDocket No. 20223-183945-01); Pamela Barney (eDocket No. 20223-183362-01); Ann Merrick (eDocket No. 20222-183136-01); Remy Eisendrath (eDocket No. 20222-183138-01); Kay Brandt (eDocket No. 20222-183079-01); Kevin Fitton (eDocket No. 20222-182906-01); Michael Parent, Jr. (eDocket No. 20222-192918-01); Kathleen Quin (eDocket No. 20222-182718-01); Barbara Alt (eDocket No. 20222-182689-01); Arne Hesson (eDocket No. 20222-182548-01); Donald Mullins (eDocket No. 20222-182718-01) (noting that CenterPoint should have been aware of the cold weather risk at least 11 years ago and have addressed it before 2021; also advocating for use of the Bakken oil fields in North Dakota to be used to supply natural gas to Minnesota).

⁴³ Roger Kloster (Hrg. Tr. at Vol. I, 29-33); Linda Kennedy (Hrg. Tr. at Vol. II, 24-33, 54); Roger Elgersma (Hrg. Tr. at Vol. II, 34-47) (eDocket No. 20224-185031-01) (also asserting "deceit" in the answers to questions provided by CenterPoint staff at the public hearings); Ron Hein (Hrg. Tr. at Vol. II, 51-54); Erin Rea (Hrg. Tr. at Vol. III, 40-45) (questioning rate of return and return on equity); Allison Koch (Hrg. Tr. at Vol. III, 46-61); Brian Blackmore (Hrg. Tr. at Vol. III, 62-73); Ron Stoffel (Hrg. Tr. at Vol. III, 74-79) (questioning CP's return on equity and rate of return); Jaden Kelly (Hrg. Tr. at Vol. III, 84-86); Mary Brown (eDocket No. 20223-183945-01); Jennifer Nyberg (eDocket No. 20223-183650-01); Dennis Wagner (eDocket No. 20223-186542-01); Jaden Kelly (eDocket Nos. 20222-183137-01, 20222-183079-01); Remy Eisendrath (eDocket No. 20222-183138-01); Cynthia Mohnen Brick (eDocket No. 20222-183019-01); Zach Hillesland (eDocket No. 20222-182906-01); Ryan Sollinger (eDocket No. 20222-183019-01); Andre Guirard (eDocket No. 20222-192918-01); Kyle Anthony Johnson (eDocket No. 20222-182718-01); Tom Barrett (eDocket No. 202112-180696-01); Steven Curtis (eDocket No. 20222-182840-03) (also disputing the recovery of expenses such as lobbying costs, association dues, and advertising).

Rates shall not be unreasonably preferential, unreasonably prejudicial, or discriminatory, but shall be sufficient, equitable, and consistent in application to a class of consumers. To the maximum reasonable extent, the commission shall set rates to encourage energy conservation and renewable energy use Any doubt as to reasonableness should be resolved in favor of the consumer.⁴⁴

36. Minn. Stat. § 216B.16, subd. 6 (2020), provides guidance for determining just and reasonable rates and requires the Commission to consider:

the public need for adequate, efficient, and reasonable service and the need of the public utility for revenue sufficient to enable it to meet the cost of furnishing the service, including adequate provision for depreciation of its utility property used and useful in rendering service to the public, and to earn a fair and reasonable return upon the investment in such property.

37. In setting rates, the Commission acts in both a quasi-judicial and quasi-legislative capacity. As a quasi-judicial body, the Commission makes detailed findings of fact. As a quasi-legislative body, the Commission uses its expertise and judgment to resolve issues.

38. The traditional approach for utilities proposing rate increases has been for the utility to select a test year and establish its rate base, revenues, expenses, and a reasonable rate of return to demonstrate that its revenue is insufficient to meet its test year expenses plus afford the Company's shareholders a reasonable return on their investments. From the test year costs, including a reasonable rate of return on rate base, the utility develops its revenue requirement. The utility will conduct a study of the costs of serving each class of customers. The utility proposes how to allocate its revenue requirement among the customer classes, taking into account each class's cost of service, but also considering other goals, such as conservation. The last step is the utility's proposal for how rates should be designed to collect the appropriate revenues from each class. In this process, the Company must comply with Minnesota law as well as prior orders of the Commission.

39. The Company's revenue requirement consists of all expenses it prudently incurs to provide natural gas service to its Minnesota customers. These expenses include the Company's operating expenses, depreciation on its capital assets, taxes, and a margin sufficient to allow the Company a reasonable opportunity to earn its authorized rate of return. The Company chose a calendar year as its test year: January 1, 2022, through December 31, 2022.

40. The legislature has assigned the Company the burden of proof to show that its requested rates are just and reasonable. In contested case proceedings where the applicable substantive law does not assign a different burden or standard, Minn.

⁴⁴ Minn. Stat. § 216B.03 (2020).

R. 1400.7300, subp. 5 (2021) provides that the party proposing that a certain action be taken bears the burden of proving the facts at issue by a preponderance of the evidence.

41. Minnesota law encourages parties to settle issues among themselves.⁴⁵ An alternative to contested case proceedings is for the parties to propose a resolution of all disputed issues based upon substantial evidence and which results in just and reasonable rates. The Settlement filed by the Parties is a global accord, reaching and resolving every issue in the case.

42. Minn. Stat. § 216B.16, subd. 1a(b) (2020), provides that:

If the applicant and all intervening parties agree to a stipulated settlement of the case or parts of the case, the settlement must be submitted to the commission. The commission shall accept or reject the settlement in its entirety and, at any time until its final order is issued in the case, may require the Office of Administrative Hearings to conduct a contested case hearing. The Commission may accept the settlement on finding that to do so is in the public interest and is supported by substantial evidence. If the commission does not accept the settlement, it may issue an order modifying the settlement subject to the approval of the parties. Each party shall have ten days in which to reject the proposed modification. If no party rejects the proposed modification, the commission's order becomes final. If the commission rejects the settlement, or a party rejects the commission's proposed modification, a contested case hearing must be completed.

43. In summary, if the Commission approves the Settlement, the case is concluded. If the Commission proposes modifications to the Settlement, the Parties have 10 days to either accept or reject the modification. If any party rejects the Commission's modification to the Settlement, the Commission must remand the case to the OAH to conduct evidentiary hearings and conclude the contested case.

VI. The Settlement

44. As detailed in the Settlement, the Parties were able to resolve all issues in the case. The Settlement succinctly states the Parties' positions on each of their applicable issues and explains the issue's resolution. The Settlement needs little explanation, as reviewing the Parties' positions and comparing party positions to the terms of the Settlement indicates the compromises that all of the Parties made to achieve a global settlement.

45. The Administrative Law Judge has reviewed the Settlement and recommends that the Commission find it to be in the public interest and supported by substantial evidence in the record. The rates that will result from implementing the Settlement will be just and reasonable.

⁴⁵ Minn. Stat. § 216B.16, subd. 1a(a) (2020).

46. The Administrative Law Judge finds the Settlement to be comprehensive and each disputed issue is reasonably resolved based on substantial record evidence. The Administrative Law Judge recommends that the Commission approve the Settlement and highlights the following factors for the Commission's consideration.

47. First, instead of the Company's initially proposed 6.5 percent, or \$67.1 million in rate increases, the Settlement proposes an increase of 4.2 percent,⁴⁶ or \$48.5 million, reducing the Company's test year revenue deficiency by \$18.6 million.

48. Second, the Settlement proposes to recover the revenue deficiency by apportioning a lower share of the increase to the Residential Class than proposed by the Company, addressing concerns from public commenters about the size of the proposed residential increase.

49. Third, the rate design proposed in the Settlement differs by customer class. The Residential, Commercial, and Industrial A classes will see an increase in their Delivery Charge, but their monthly Basic Charge will stay the same, addressing concerns raised by OAG, CEOs, and public commenters, who objected to an increase in the Basic Charge. All other classes will have both their Basic Charges and their Delivery Charges increased.

50. Fourth, the Settlement's proposed return on equity (ROE) of 9.39 percent and resulting overall cost of capital of 6.65 percent is reasonable and supported by the record. In Direct Testimony, the Company proposed a capital structure and recommended values for the cost of long-term and short-term debt, and supported a return on equity (ROE) of 10.20 percent, resulting in a weighted cost of capital of 7.06 percent. The DOC agreed with the Company's proposed capital structure and recommended values for the cost of long-term and short-term debt and recommended an ROE of 9.25, resulting in an overall cost of capital of 6.58 percent. The Settlement's proposed ROE, and resulting cost of capital, falls within the range of the Parties' estimates.

51. Fifth, the Settlement is informed by, but does not endorse, any single Class Cost of Service Study (CCOSS). In recent utility cases, the Commission has preferred to consider multiple CCOSSs rather than to base cost classification and allocation upon a single CCOSS.

52. Sixth, a number of the disputed issues are resolved in a transparently just and reasonable manner. These include the use of actual plant balances at the beginning of the test year rather than the Company's projected balance, updating the cost of gas, and adopting multiple financial adjustments as proposed by the DOC and OAG.

53. Seventh, in the Settlement, the Parties agree to credit the Company's property tax tracker by approximately \$5.7 million to reflect a property tax refund received by the Company following successful appeal of its 2017 property taxes, reducing the test

⁴⁶ Settlement, Attachment 4, Schedule E-1(a) (Mar. 14, 2022).

year amortization expense, and therefore reducing the Company's rate increase, by \$2.8 million.

54. Finally, through the Settlement, the Parties agreed to request that the Commission address certain policy issues, including natural gas line extension policies and integrity management investments, in a separate Commission investigation docket, so that those issues can be further developed and addressed in an industry-wide context. The Administrative Law Judge agrees that these issues are better addressed outside of the confines and structure of this rate case proceeding.

VII. Specific Issues

55. The Notice of and Order for Hearing set forth eight specific issues to be discussed in this proceeding, each of which is addressed in the Settlement.⁴⁷

1. The Settlement reduces the test year revenue increase from the \$67.2 million per year (as requested by the Company) to \$48.5 million per year.⁴⁸

2. The Settlement modifies the rate design proposed by the Company apportioning a smaller share of the revenue increase to the Residential class and holding the Basic Charge for the Residential and Commercial and Industrial A classes at their current levels rather than increasing them as proposed by the Company.⁴⁹

3. The Settlement uses the Company's proposed capital structure but lowers the return-on-equity from 10.20 percent (as proposed by the Company) to 9.39 percent.⁵⁰

4. The Settlement updates the base cost of gas proposed in *In the Matter of CenterPoint Energy Resources Corporation's Filing to Establish a New Base Gas Cost Filing (PGA Zero-Out) for Interim Rates in CenterPoint Energy's General Rate Filing*, Docket Nos. G-008/GR-21-435 and G-008/MR-21-436.⁵¹

5. The Settlement uses the Company's proposed capital structure as also recommended by the Department, the only other party to file testimony on this issue.⁵²

6. The Parties agreed to a number of specific financial adjustments and to other adjustments, as set forth in the Settlement.

⁴⁷ Notice of and Order for Hearing at 2 (Dec. 30, 2021) (eDocket No. 202112-181087-02).

⁴⁸ Settlement, Section III, C.

⁴⁹ Settlement, Sections III, E and III, F.

⁵⁰ Settlement, Section III, A.

⁵¹ Settlement, Section III, B, 26 and Attachment 3.

⁵² Settlement, Section III, C; DOC Ex. 4 at 55-70 (Addonizio Direct).

7. The Company withdrew its request for an income tax rider as part of the Settlement.⁵³

8. The Settlement provided calculations for Minnesota-based personnel or full-time equivalents.⁵⁴

VIII. General Provisions of the Settlement

56. The Settlement provides for the confidentiality of settlement offers and discussions. Should the Commission reject the Settlement, the agreement provides that it shall not be part of the record and that no party may use it for any purpose in any proceeding.

57. The Settlement obligates the Parties to support and defend it in its entirety without modification.

58. The Settlement implements the provisions of Minn. Stat. § 216B.16, subd. 1a(b) (2020). If the Commission rejects the Settlement, it must remand the case to the OAH to complete the contested case proceedings. If the Commission modifies the Settlement, the Parties have 10 days in which to reject the modification. If any party does object, the Commission must remand the case to the OAH to complete the contested case proceedings.

59. Should the Commission remand the case to the OAH, the Parties are free to argue their positions as set forth in their pre-filed testimony.

60. Based on these Findings of Fact, the Administrative Law Judge makes the following:

CONCLUSIONS OF LAW

1. The Minnesota Public Utilities Commission and the Administrative Law Judge have jurisdiction to consider this matter pursuant to Minn. Stat. §§ 14.50, 216B.08 (2020).

2. The public and the Parties received timely and proper notice of the public hearings and the Company complied with all procedural requirements of statute and rule.

3. As Minn. Stat. § 216B.03 requires, every rate set by the Commission shall be just and reasonable. Rates shall not be unreasonably preferential, prejudicial, or discriminatory, but shall be sufficient, equitable, and consistent in application to a class of consumers. The Commission shall set rates that, to the maximum reasonable extent, encourage energy conservation and renewable energy use and further the goals of Minn. Stat. §§ 216B.164, 216B.241, 216C.05 (2020).

⁵³ Settlement, Section III, I.

⁵⁴ Settlement, Section III, J.

4. Minn. Stat. § 216B.16, subd. 4 (2020) places the burden of proof to show that a rate change is just and reasonable on the Company. Any doubt as to reasonableness should be resolved in favor of the consumer pursuant to Minn. Stat. § 216B.03 (2020).

5. The record supports the resolution of disputed issues as set out in the Settlement. The Settlement's disposition of disputed issues resolves them in a manner consistent with the public interest and on the basis of substantial evidence.

6. Rates set in accordance with the Settlement would be just and reasonable.

7. After the Commission determines final rates, they should be compared to the interim rates established in the Commission's Order Setting Interim Rates issued on December 30, 2021, and a refund ordered (or surcharge permitted), to the extent that final rates are lower (or higher) than interim rates, under the terms set forth in Minn. Stat. § 216B.16, subd. 3(c) (2020).

8. Any Findings of Fact more properly designated as Conclusions of Law are hereby adopted as such.

Based upon these Conclusions of Law, the Administrative Law Judge makes the following:

RECOMMENDATION

The Administrative Law Judge recommends that the Commission approve the Settlement and incorporate it into its Order.

Dated: May 12, 2022

A handwritten signature in black ink, appearing to read 'A. O'Reilly', written over a horizontal line.

ANN C. O'REILLY
Administrative Law Judge

NOTICE

Notice is hereby given that exceptions to this Report, if any, by any party adversely affected must be filed under the timeframes established in the Commission's rules of practice and procedure, Minn. R. 7829.2700, .3100 (2021), unless otherwise directed by the Commission. Exceptions should be specific and stated and numbered separately. Oral argument before a majority of the Commission will be permitted pursuant to Minn. R. 7829.2700, subp. 3. The Commission will make the final determination of the matter after the expiration of the period for filing exceptions, or after oral argument, if an oral argument is held.

The Commission may, at its own discretion, accept, modify, or reject the Administrative Law Judge's recommendations. The recommendations of the Administrative Law Judge have no legal effect unless expressly adopted by the Commission as its final order.

May 12, 2022

See Attached Service List

Re: *In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas for Authority to Increase Natural Gas Rates in Minnesota*
OAH 65-2500-38009
MPUC G-008/GR 21-435

To All Persons on the Attached Service List:

Enclosed and served upon you is the Administrative Law Judge's **FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATION TO APPROVE SETTLEMENT** in the above-entitled matter.

If you have any questions, please contact me at (651) 361-7874, michelle.severson@state.mn.us, or via facsimile at (651) 539-0310.

Sincerely,



MICHELLE SEVERSON
Legal Assistant

Enclosure

cc: Docket Coordinator

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS
PO BOX 64620
600 NORTH ROBERT STREET
ST. PAUL, MINNESOTA 55164

CERTIFICATE OF SERVICE

In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas for Authority to Increase Natural Gas Rates in Minnesota	OAH Docket No.: 65-2500-38009 MPUC G-008/GR 21-435
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Michelle Severson certifies that on May 12, 2022, she served the true and correct

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATION TO APPROVE SETTLEMENT by eService, and U.S. Mail, (in the manner indicated below) to the following individuals:

Last Name	First Name	Email	Company Name
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