



February 4, 2022

Mr. William Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

**Re:** IN THE MATTER OF A PETITION BY CENTERPOINT ENERGY AND THE CITY OF MINNEAPOLIS TO  
INTRODUCE A TARIFFED ON-BILL FINANCING PILOT PROGRAM

DOCKET NUMBER: G-008/M-21-377

Dear Mr. Seuffert:

Enclosed please find the Comments of the Energy CENTS Coalition in the above-referenced matter. If you have any questions, please call me at 651-470-4500.

Sincerely,

Pam Marshall  
Executive Director  
Energy CENTS Coalition

**State of Minnesota  
Before the Public Utilities Commission**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

IN THE MATTER OF A PETITION BY CENTERPOINT ENERGY  
AND THE CITY OF MINNEAPOLIS TO INTRODUCE A  
TARIFFED ON-BILL FINANCING PILOT PROGRAM

DOCKET NUMBER: G-008/M-21-377

**INTRODUCTION**

The Energy CENTS Coalition (“ECC”) promotes affordable energy service for low- and fixed-income Minnesotans through regulatory proceedings, policy advocacy, and the administration of direct utility bill-payment and conservation assistance programs. ECC appreciates the opportunity to comment on this matter.

For three primary reasons, ECC strongly recommends that the Commission reject the proposed Tariffed On-Bill (TOB) pilot program. CenterPoint Energy (“CPE” or “the Company”) and the City of Minneapolis (“the City”) (collectively, “the Petitioners”) “plan to... move energy efficiency programs to more just and equitable outcomes for communities of color, renters, and households with low incomes.”<sup>1</sup> First, ECC believes the exact opposite outcome will occur. The definitional foundation of the TOB requires renters to purchase and finance energy efficient equipment, insulation, and other conservation measures. ECC does not believe tenants should pay to improve landlords’ rental properties. Imposing debt obligations on low-income households that qualify for free conservation services only exacerbates the inequitable distribution of conservation resources.

Second, in direct contradiction to the City’s principles, that state there should be “no up-front payment and no debt obligation to participate,”<sup>2</sup> the proposed TOB requires participants to pay a \$100 on-site energy assessment fee and a \$475 program administration services fee.<sup>3</sup> As discussed further below, any meaningful conservation investment will also require participants to pay significant up-front costs.

Third, the TOB pilot is not an essential utility service. Yet, under the terms of the program, participants will be disconnected from service for failure to pay TOB charges.

For these reasons, alone, ECC believes the Commission should reject the TOB pilot program. Additional reasons supporting ECC’s recommendation to reject the Petition are included in the sections below.

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<sup>1</sup> Petition, p. 14.

<sup>2</sup> *Id.*, Exhibit A, p. 2.

<sup>3</sup> *Id.* at 15.

## BACKGROUND

On March 1, 2021, the Commission declined “to adopt the TOB proposal” and directed “parties and stakeholders to further develop conservation proposals designed to address the needs of renters.”<sup>4</sup> ECC participated in the stakeholder conversations, none of which addressed any proposals other than the TOB program. These conversations were limited to how to implement a TOB program.<sup>5</sup>

On June 1, 2021, the Company requested an extension to the Commission’s Order.

On September 1, 2021, the Company and City filed the current Petition.

In the 2008 CenterPoint Energy (“CPE” or “the Company”) rate case, ECC advocated for additional low-income Conservation Improvement Program (CIP) resources, particularly for low-income renters. The Commission required the Company to file “proposals for new and enhanced conservation projects with the Commission for evaluation in the context of this rate case, and with the OES through the CIP process.”<sup>6</sup> In 2010, the Department of Commerce (“the Department” or “DER”) approved CPE’s Low Income Rental Efficiency (LIRE) as a three-year pilot program<sup>7</sup> and LIRE remains a permanent part of the Company’s CIP portfolio today. ECC worked with CPE to design and implement the program and acts as the LIRE implementer.

LIRE offers property owners, renting to low-income tenants in one-to-four unit dwellings, a free energy audit and requires landlords to pay one-half of any recommended energy upgrades, including attic and wall insulation, air-sealing, exhaust fans, furnaces, boilers, and water heaters. Tenants receive the benefit of lower monthly natural gas bills without any financial obligation of any kind. The Department recently approved<sup>8</sup> the Company’s proposal to allow automatic (no income verification) for rental buildings located in the same TOB target communities—Minneapolis Green Zones and Areas of Concentrated Poverty.<sup>9</sup>

As discussed further below, both CPE and Xcel Energy have proposed significant low-income CIP spending increases, offering free conservation services in the same TOB target communities.

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<sup>4</sup> ORDER ACCEPTING AND ADOPTING AGREEMENT SETTING RATES, AND INITIATING DEVELOPMENT OF CONSERVATION PROGRAMS FOR RENTERS, 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, DOCKET NO. G-008/GR-19-524, March 1, 2021.

<sup>5</sup> Petition, Exhibit C.

<sup>6</sup> FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER In the Matter of an Application by CenterPoint Energy for Authority to Increase Natural Gas Rates in Minnesota, DOCKET NO. G-008/GR-08-1075, January 11, 2010, p. 24.

<sup>7</sup> DOCKET NO. G008/CIP-09-644.

<sup>8</sup> Decision In the Matter of CenterPoint Energy’s 2021-2023 CIP Modification Request, Docket No. G008/CIP-20-478, November 1, 2021.

<sup>9</sup> Defined as areas with an overall poverty rate greater than 40 percent.

## Comments of the Energy CENTS Coalition

### I. TOB TARGETS COMMUNITIES WHO ARE ELIGIBLE FOR FREE CONSERVATION SERVICES

The Petition states that

The Company will target its TOB pilot marketing at high energy users and high energy burden customers including customers living in and property owners of single and multifamily rental buildings, with a particular focus on Minneapolis Green Zones, Minneapolis designated communities that have been deeply affected by pollution, racism and other factors. TOB pilot messaging will be aligned with CIP and Energy Assistance Services so that customers are able to make well-informed choices about the services and resources that will work best for them.<sup>10</sup>

Attachment A (CPE's response to Community Power's Information Request No. 003) reaffirms that outreach and marketing to encourage TOB participation will be focused in low-income communities. It is not important that low-income people are not considered the main demographic for the TOB program. The fact is that the targeted outreach to these communities and high energy burdened households, by definition, will be disproportionately directed at low-income and renter households. In other words, the vast majority of households in the TOB target communities are income-eligible for existing, no-cost CIP programs and the federal Weatherization Assistance Program (WAP).

ECC is concerned that the proposed pilot's attempts at "informing," "encouraging," "aligning messaging," and "disclosing" information to customers to take advantage of free CIP or WAP does not provide a sufficient assurance that customers will be referred to those programs. The Petitioner's assumption that TOB will be offered as a "choice" to households that are eligible for free conservation services reinforces this concern. ECC does not believe that low-income people would ever choose a program that requires them to purchase and finance energy efficiency measures on behalf of their landlords over a program that offers free comprehensive conservation services. To meet participation goals, it seems TOB would have to convince 500 households, including households in the low-income target communities, that the TOB program will "work best for them."

The Company and the City claim that a TOB program can overcome "some barriers to participation in CIP and income-qualified services."<sup>11</sup> Two of the identified barriers do not apply to free CIP or WAP services— "unwillingness to take out a personal loan [and] poor or no credit score to qualify for financing." Given the targeted communities, it is unlikely that many households will be over-income for free services, particularly when the income eligibility guidelines (indicated below) for CIP and WAP are significantly above the federal poverty level.

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<sup>10</sup> Petition, p. 10.

<sup>11</sup> *Id.* at 6.

Household/ Family Size	200% FPL (CPE CIP/WAP)	300% FPL (Xcel CIP)	60% SMI (LIHEAP/WAP/CPE CIP)
1	\$27,180	\$40,770	\$35,237
2	\$36,620	\$54,930	\$46,080
3	\$46,060	\$69,090	\$56,922
4	\$55,500	\$83,250	\$67,765
5	\$64,940	\$97,410	\$78,607
6	\$74,380	\$111,570	\$89,450
7	\$83,820	\$125,730	\$91,483
8	\$93,260	\$139,890	\$93,515

CenterPoint Energy’s LIRE program is designed to encourage property owners to invest in efficiency upgrades, addressing the split-incentive problem and offering upgrades at one-half the cost. The fact is, of course, that property owners participate in LIRE year after year. The Petitioners provide no evidence to substantiate their claim that low-income people are “not willing or able to participate in CIP or income-qualified efficiency services due to one or more of [these] barriers.”<sup>12</sup> Decades of low-income participation in CIP and WAP demonstrate the opposite of the Petitioner’s claim. As discussed further below, participation in these programs will expand significantly as the funding for these programs increases.

If low-income CPE customers identified through TOB outreach efforts will be directed to free low-income conservation programs, then ECC recommends that the proposed TOB program funding should also be directed to those programs. In fact, the Company has stated that if a significant number of customers are identified as income-eligible, “the Company may increase their low-income CIP spending to accommodate increased demand for low-income offerings...if it looks like spending will be above 125 percent of the planned budget, the Company will file a [CIP] modification in alignment with Department of Commerce guidance” (Attachment B). Rather than continue to pursue TOB, a program that imposes financial risk on low-income renter households, any conservation program outreach efforts should direct low-income people to free conservation services and the Company should seek additional funding so those services can be provided, uninterrupted, to more low-income households.

## II. TOB REQUIRES SUBSTANTIAL PARTICIPANT UP-FRONT COSTS

Contrary to one of the City’s principles that “no up-front payment”<sup>13</sup> should be required in a TOB program, the Petition states that participants will be required to pay a \$475 program administration fee.<sup>14</sup> After paying the fee, the Petitioners assert that TOB participants will realize guaranteed monthly energy bill savings because the energy savings from the financed measure will be greater than the

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*, Exhibit A, p.2.

<sup>14</sup> *Id.* at 11, 15.

required TOB payment. Specifically, the Petitioners state that “energy upgrades will be considered cost-effective if the participating customers’ annual program charges are 80 percent or less of the estimated weather-normalized annual electric and gas bill savings that will result from the upgrades (“the 80/20 rule”).<sup>15</sup>

However, for any meaningful conservation investment, the 80/20 rule is a hollow promise because it is only applied *after* a TOB participant pays the administration fee *and* significant, up-front co-payments for the cost of various energy efficiency improvements. The following information is included in Attachment C:

In order to meet this [80/20] principle, the total TOB pilot project cost of \$5,889, described in the example in Exhibit O, requires a TOB charge of \$38/month for 12 years with an upfront co-payment of \$455 [updated to \$612, See Attachment E] to recover costs. The Company will work with the TOB program operator, installation contractors, and program partners, including the City of Minneapolis, to reduce the upfront co-payments to zero or minimize upfront co-payment to the extent possible. Pending those partnerships to reduce participant costs, the Company expects that *upfront co-payments may be necessary in many cases* given its assumptions around TOB pilot costs and energy savings potential (emphasis added).<sup>16</sup>

In Exhibit F of the Petition, the “TOB Pilot Participant Check List” states that participants “may be eligible for copayment assistance from a governmental entity or non-profit.”<sup>17</sup> As shown in Attachment D, however, “the Company has not determined the government entities or non-profit organizations that will provide financial assistance for customer co-payments. Pending approval of the TOB pilot petition, the Company’s understanding is that the City of Minneapolis is planning to provide financial support for customer co-payments for its residents.” The Petition offers no further information about a financial assistance budget, level of potential co-payment assistance, or organizations that would administer any co-payment funds. This concern is magnified in an example that includes exhaust fans that are almost always necessitated after a dwelling is insulated and sealed. Of course, as shown in Attachment E, the co-payment obligation increases substantially if the example includes furnaces, boilers, or water heaters.

In the TOB energy upgrade cost example below, adding an exhaust fan increases the participant co-payment by \$380 (Attachment E). However, the exhaust fan cost increase is understated because the actual installation cost for them is \$1,600.<sup>18</sup> In Attachment E, the Company also estimates that the cost of a water heater is \$2,000. The actual cost to install power-vented water heaters under CPE’s LIRE Program is \$3,200. In other words, if a TOB participant intended to finance a water heater replacement,

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<sup>15</sup> *Id.* at 18.

<sup>16</sup> See Attachment C.

<sup>17</sup> Petition, Exhibit F, p. 1.

<sup>18</sup> Current reimbursement for work ordered through ECC for CenterPoint Energy’s Low Income Rental Efficiency Program and Xcel Energy’s Home Energy Savings Program (east metro).

insulation and an exhaust fan, the required up-front co-payment amount is about \$5,412 (\$3,200+\$1,600+612).<sup>19</sup>

No.	Energy Upgrades	Net TOB Pilot Project Cost (\$)	Total Eligible TOB Pilot Participant Charge (\$)	Participant Upfront Copay Requirement (\$)	Participant Upfront Copay Requirement with corrected Costs (\$)
1.0	Exhibit O Example	5,889	5,434	455	
2.0	Exhibit O Example Update <sup>20</sup>	5,864	5,252	612	
2.1	w/ bath fan installation	6,244	5,252	992	2,212
2.2	w/ 96% efficient furnace	10,428	7,676	2,752	
2.3	w/ 96% efficient furnace and bath fan	10,808	7,676	3,132	4,352
2.4	w/ 96% efficient furnace and a water heater (0.69)	12,198	7,817	4,381	5,581
2.5	w/ 96% efficient furnace, water heater, and bath fan	12,578	7,817	4,761	5,981
2.5	w/ 95% efficient boiler	14,062	6,703	7,359	
2.7	w/ 95% efficient boiler and exhaust fan	14,442	6,703	7,739	8,959
2.8	w/ 95% efficient boiler, water heater and exhaust fan	16,212	6,845	9,367	9,787

These co-payment examples show that any meaningful and comprehensive energy efficiency upgrades require very high up-front co-payments. For insulation and exhaust fans alone, the required co-payment is \$2,212, plus the \$475 administrative fee, costing participants \$2,687 before any financing charges are applied.. The examples also show that only lower cost measures will “qualify” for financing, ensuring that TOB participants will pay much more than the actual cost to purchase those measures.

### III. TOB START-UP AND ADMINISTRATIVE COSTS ARE UNREASONABLE

The total project delivery and start-up costs for the proposed TOB pilot is \$3,978,000 (\$2,221,500+\$1,756,500) and the proposed spending for energy upgrades is \$7,500,000.<sup>21</sup> In other words, administrative costs for this program represent 53% of the total project costs. Even without the

<sup>19</sup> Minimal additional savings will be realized to offset these costs because only the efficient water heater is added in this example.

<sup>20</sup> See Attachment E.

<sup>21</sup> Petition, Exhibit L, p. 1.

start-up costs, the administrative costs for this program represent nearly 30% (29.62%) of the total project costs. These costs are likely to increase because they are based on an estimate of

direct-installation services for 625 participants served per year [which, in turn, is] based on amount necessary to achieve 500 participant per year goal assuming an 80% participant acceptance rate of TOB pilot projects; 80-90% is the acceptance rate quoted by existing PAYS® providers *when there is no upfront co-pay* (emphasis added).<sup>22</sup>

ECC is concerned that, because the TOB will require customer co-pays “in many cases,” the project delivery costs (particularly marketing and outreach costs) will increase (due to lower acceptance rates) in order to reach the goal of 500 participants each year.

#### **IV. CPE AND XCEL ENERGY HAVE PROPOSED SIGNIFICANT LOW-INCOME CIP INCREASES AND MODIFICATIONS TO CIP PROGRAMS**

##### **A. Increased spending levels**

In response to the recently enacted Energy Conservation and Optimization Policy Goal (ECO) legislation<sup>23</sup> and COVID economic recovery efforts, CPE and Xcel Energy have proposed significant increases in low-income CIP spending.

In 2019, CPE’s low-income CIP segment spending was \$4,054,697, assisting 2,868 low-income participants.<sup>24</sup> With spending increases in each year, the Company’s approved 2023 low-income CIP spending is \$6,502,557 with a projected 3,380 participants.<sup>25</sup> In contrast, the Petition proposes a first-year TOB budget of \$6,110,000 (including start-up costs) for 500 participants. In the second and third year of the pilot, the Company and City propose to spend \$4,353,500 for 500 participants. TOB costs more than low-income CIP even when CIP provides comprehensive services at no cost to low-income people. As Commissioner Sullivan noted, “low-income CIP is the perfect vehicle for developing a

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<sup>22</sup> Petition, p. 6.

<sup>23</sup> Minn. Stat. §216B.241 subd. 7(a): “The commissioner shall ensure that each public utility subject to subdivision 1c provides energy conservation and efficient fuel-switching programs to low-income households. When approving spending and energy-savings goals for low-income programs, the commissioner shall consider historic spending and participation levels, energy savings achieved by low-income programs, and the number of low-income persons residing in the utility's service territory. Beginning January 1, 2022, a public utility furnishing gas service must spend at least one percent of its most recent three-year average gross operating revenue from residential customers in the state on low-income programs. A public utility that furnishes electric service must spend at least 0.4 percent of its gross operating revenue from residential customers in the state on low-income programs. Beginning in 2024, a public utility that furnishes electric service must spend 0.6 percent of the public utility's gross operating revenue from residential customers in the state on low-income programs.”

<sup>24</sup> In the Matter of CenterPoint Energy’s 2019 Conservation Improvement Program Status Report Docket No. G008/CIP-16-119.05, August 6, 2020.

<sup>25</sup> DOC Decision In the Matter of CenterPoint Energy’s 2021-2023 CIP Modification Request Filed November 1, 2021 Docket No. G008/CIP-20-478, January 31, 2022.

program to help folks in need.<sup>26</sup> Fortunately, the Company has proposed these funding and participation level increases.

Xcel Energy spent \$ 1,696,367 in 2020 for low-income electric CIP programs, assisting 2,860 participants.<sup>27</sup> In 2023, the Company's approved spending is \$5,521,379 with a projected 10,660 participants.<sup>28</sup>

Attachment F shows specific budget and participation level increases for CPE's main low-income CIP programs and Xcel Energy's electric low-income segment CIP budget and participation increases. In 2023, the funding for just the two direct-installation programs, provided to low-income CPE customers at no cost (LIW and LIRE) totals \$5 million and assists 1,705 customers with comprehensive services (audits, insulation, air-sealing, HVAC, water heaters, and health and safety measures). Additional funding through CPE's Home Energy Squad Program can provide free visits and low-cost conservation measures to an additional 1,350 low-income and renter households.

As indicated in the Commissioner's decision, funding for these programs may increase even further:

The Department will provide utilities with flexibility to exceed individual program budgets when programs experience high demand. The Commissioner directs Staff to monitor program performance reported in the CIP status reports and expects the Company to work to meet low-income customer program demand. If there is significantly greater demand from customers than was projected by the Company, the Commissioner can evaluate whether any adjustments are warranted.<sup>29</sup>

In addition, the Company will "file new dedicated low-income programs (in Q2 2022) and propose to begin implementation of those programs once they are approved (rather than wait until 2023)." The programs will "address low-income qualifying 5+ unit multi-family buildings and weatherization of 5-20 unit buildings as a part of at least one of the proposed new programs or proposed for existing programs." Accordingly, the Company states that low-income spending for these new programs will total \$400,000-\$600,000.<sup>30</sup>

As shown in the chart below, the federal Weatherization Assistance Program (WAP) has also experienced funding increases over the past few years, doubling the base amount available to the program from \$17 million to about \$24 million.<sup>31</sup>

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<sup>26</sup> Commission Agenda Meeting, Docket No. G-008/GR-19-524, January 14, 2021.

<sup>27</sup> In the Matter of Xcel Energy's 2020 Conservation Improvement Program Status Report, Docket No. E,G002/CIP-16-115.09, July 8, 2021.

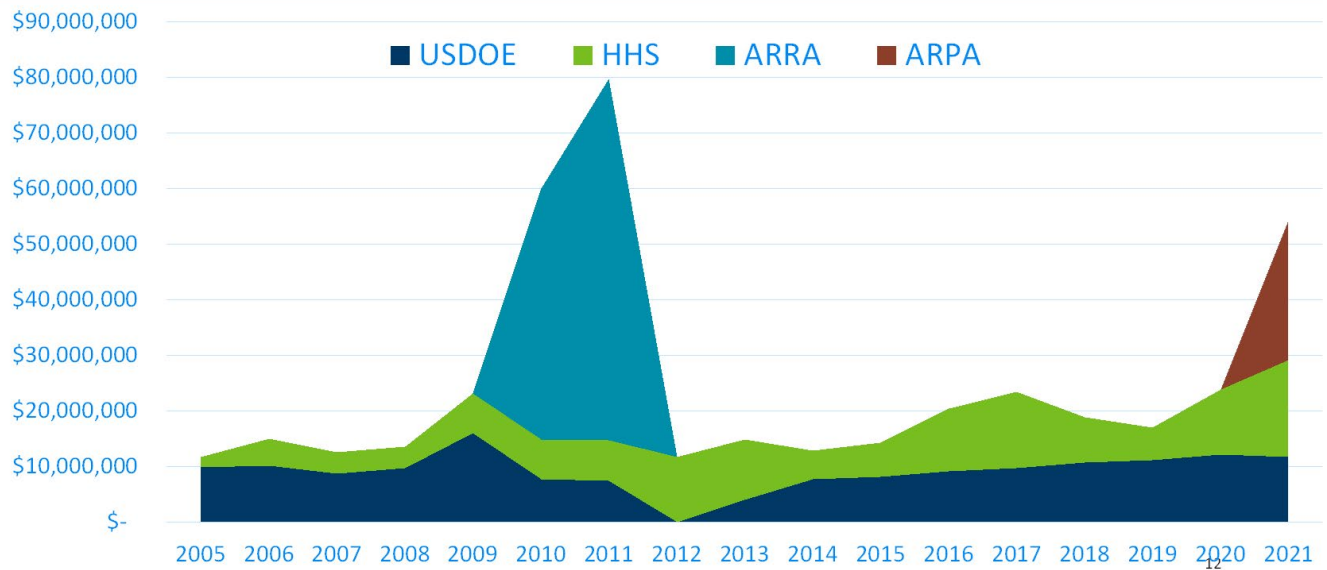
<sup>28</sup> DOC Decision In the Matter of Xcel 2021-2023 CIP Modification Request Docket No. E,G002/CIP-20-473 Filed November 1, 2021, January 31, 2022.

<sup>29</sup> DOC Decision In the Matter of CenterPoint Energy's 2021-2023 CIP Modification Request Filed November 1, 2021 Docket No. G008/CIP-20-478, January 31, 2022, p. 16.

<sup>30</sup> *Id.* at 15.

<sup>31</sup> Minnesota Department of Commerce (the base level is defined as "USDOE", the primary source of WAP funds and "HHS", the transfer of funds from annual LIHEAP appropriations to Minnesota's WAP.

## WAP Funding Allocation Levels



\* ARRA American Recovery and Reinvestment Act; ARPA American Rescue Plan Act

### B. Other CIP modifications

In addition to approving increased low-income CIP funding and participation levels, the Department approved CPE's requests to incorporate geographical eligibility to the Company's LIW and LIRE programs.<sup>32</sup> Determining geographical eligibility removes a barrier to low-income CIP participation, primarily for LIRE, because tenants in these communities will not be required to provide income information or verification to a landlord or to the CIP implementer. Further, the Department will require CPE to "track and include in its annual CIP Status Report the number of participants in the Green Zones and Areas of Concentrated Poverty. The Commissioner also requests that CPE keep Staff informed of the results of the Company's 2022-2023 evaluation that will analyze to what extent low-income renters are being served under these new eligibility criteria."<sup>33</sup>

<sup>32</sup> Decision: In the Matter of CenterPoint Energy's 2021-2023 CIP Modification Request Filed September 1, 2021, Docket No. G008/CIP-20-478, January 31, 2022, p. 16.

<sup>33</sup> *Id.* at 17.

## **V. EXISTING CPE LOW-INCOME CIP PROGRAMS ADDRESS THE SPLIT INCENTIVE PROBLEM**

According to the Petition,

Addressing the need for energy improvements in rented housing is especially difficult when the renter, rather than the property owner, is the energy customer. Generally, it is the renter who benefits from increased energy efficiency through lower utility bills, but the property owner that must authorize and pay for improvements to the building. If the property owner does not realize the cost savings, the property owner is not incented to spend the upfront money to make the energy efficiency improvement. This split incentive is one of the main problems that the TOB pilot seeks to address.<sup>34</sup>

From ECC's perspective, the TOB program ignores the split incentive issue altogether. The program simply transfers the financial obligation for investing in energy conservation to the tenant (and each subsequent tenant). CPE's LIRE program, in contrast, provides all of the benefits from lower energy bills to tenants at no cost and encourages landlords to participate by offering free energy audits and covering 50% of the cost of any recommended energy-related improvements. Commissioner Sullivan acknowledged that "the split incentive [and many other issues] have already been contemplated in CIP."<sup>35</sup>

## **VI. ADDITIONAL CONCERNS**

In previous comments, the Legal Services Advocacy Project (LSAP) provided a detailed analysis to show that the proposed TOB program is not an essential utility service. LSAP referenced Minn. Stat. § 216B.01, requiring the regulation of public utilities "in order to provide the retail consumers of natural gas and electric service ... at reasonable rates." In addition, LSAP noted that public utilities are defined as companies "operating, maintaining, or controlling ... equipment or facilities for furnishing ... natural, manufactured, or mixed gas or electric service."<sup>36</sup> LSAP further stated that "a 'service' is defined as 'natural, manufactured, or missed gas and electricity ... or facilities for delivering or measuring such gas and electricity.'"<sup>37</sup> Finally, LSAP noted that a utility rate is a charge for any service and a tariff "contains the terms and conditions for utility service," concluding that "the [TOB] program ... does not involve the delivery or measurement of gas or electricity. It [is] neither a service nor a rate."<sup>38</sup>

Minn. Stat. § 216B.0976 defines utility disconnection as a "means a cessation of *services* initiated by the public utility, cooperative electric association, or municipal utility that affects the primary heat source of a residence" (emphasis added). Minn. Stat. § 216B.096 defines utility disconnection during the cold

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<sup>34</sup> Petition, p. 5.

<sup>35</sup> Commission Agenda Meeting, Docket No. G-008/GR-19-524, January 14, 2021.

<sup>36</sup> Minn. Stat. § 216B.02, subdivision 4 (emphasis added).

<sup>37</sup> Minn. Stat. § 216B.02, subdivision 6.

<sup>38</sup> Comments of Legal Services Advocacy Project, In the Matter of the Application by CenterPoint Energy Resources Corporation d/b/a CenterPoint Energy Minnesota Gas for Authority to Increase Natural Gas Rates in Minnesota, PUC Docket No. G-008/GR-19-524, August 18, 2020, p. 5.

weather rule period as “the involuntary *loss of utility heating service* as a result of a physical act by a utility to *discontinue service*” (emphasis added). This statute further states that

During the cold weather period, a utility may not disconnect and must reconnect *utility heating service* of a customer whose household income is at or below 50 percent of the state median income if the customer enters into and makes reasonably timely payments under a mutually acceptable payment agreement with the utility that is based on the financial resources and circumstances of the household; provided that, a utility may not require a customer to pay more than ten percent of the household income toward current and past utility bills for *utility heating service* (emphasis added).

Under the terms of the TOB program, participants can be disconnected from service for non-payment of TOB charges. LSAP clearly established, however, that a TOB financial arrangement, is *not* a service. Therefore, disconnection for non-payment of TOB charges, is not permitted under Minnesota law. Further, it is unclear if the amount of TOB charges would be included, or added to, the maximum 10% of income payment required under the cold weather rule statute. ECC shares Commissioner Means’ concern that “low-income households already struggle with energy insecurity and the addition of a loan and the potential of disconnection of an essential utility service because of that loan is unreasonable.”<sup>39</sup>

It is ECC’s understanding that other Parties’ comments will address the adverse impact of the TOB program on CPE ratepayers, the flawed cost-effectiveness assumptions, contractual obligations, and other concerns. ECC will not duplicate those arguments. Instead, ECC believes there is a simple, fundamental reason to reject this program. It is not in the public interest to require low-income tenants to pay significant up-front costs and further assume a debt to pay for energy improvements that benefit landlords, while subjecting those tenants, and all subsequent tenants, to that debt and to the risk of utility service disconnection for non-payment of that debt.

## CONCLUSION

ECC recommends the Commission:

- 1) Find that the TOB program is not in the public interest and reject the TOB Petition.
- 2) Require CPE to file the proposed low-income CIP program (in Q2 2022) for 5-20 unit buildings with an annual budget of at least \$1,000,000.

Respectfully submitted,

February 4, 2022

/s/ Pam Marshall  
Energy CENTS Coalition

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<sup>39</sup> Commission Agenda Meeting, Docket No. G-008/GR-19-524, January 14, 2021.

**State of Minnesota  
Community Power Minnesota**

**Utility Information Request**

Docket Number: G008/M-21-377 - Tariffed On Bill Pilot Program

Date of Request: 12/9/2021

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 1/5/2022

Analyst Requesting Information: Alice Madden

Type of Inquiry: Other

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

Request No.	
CPMN-AM 003	<p>Please clarify that income-eligible customers are <b>*NOT*</b> the target demographic. “Low-income” ratepayers and specific areas like the Green Zones are mentioned throughout, which has led many readers who understand that Inclusive Financing is for the folks in the “missing middle” to wonder what is meant and concern by some who fear this program is targeting income-eligible customers as the main demographic. Please confirm how LI programs will be marketed before anyone signs up for IF as a participant as well as the important feature the income-eligible folks will not be barred from participating if that is their choice.</p> <p><b>Response:</b></p> <p>As described on page 13 of the September 1 TOB Petition, as part of the TOB pilot, outreach and engagement activities will be aligned with CIP and Energy Assistance services with an emphasis in educating the customers on all the resources available to them. The Company and Minneapolis will focus outreach and engagement among high energy users and high energy burden customers, particularly in the Minneapolis Green Zones. We will take steps in the marketing of the TOB pilot and in participant disclosures to inform customers about income-qualified offerings and encourage income-qualified customers to take advantage of no-cost options rather than the TOB pilot.</p>

Response By: Emma Schoppe  
 Title: Local Energy Policy Manager  
 Department: Mng Smr Reg Svc Enrgy Prog  
 Telephone: 612-321-4318

**Energy CENTS COALITION**  
**Information Request**

Docket Number: G008/M-21-377  
 Tariffed On Bill Pilot Program

Date of Request: 11/4/2021  
 Response Due: 11/24/2021

Requested From: CenterPoint Energy Minnesota Gas

Requesting Party: Energy CENTS Coalition (ECC)

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

Request No.	
ECC 08	<p>Reference: Petition, pages 13-14</p> <p>On page 13, the Company states:</p> <p style="padding-left: 40px;">"Although Minneapolis and CenterPoint Energy do not propose to prevent low-income customers from participating in the TOB pilot, we will take steps in the marketing of the TOB pilot and in participant disclosures to inform customers about income-qualified offerings and encourage income-qualified customers to take advantage of no-cost options rather than the TOB pilot."</p> <p>On page 14, the Company states that outreach efforts will engage residents "in Minneapolis Green Zones and Areas of Concentrated Poverty to inform residents and property owners of their options to improve the efficiency of their residences."</p> <p>An Area of Concentrated Poverty is defined as one in which more than 40% of the households live at or below the Federal Poverty Level. Many of the household income levels in these areas, therefore, will be significantly lower than the current CIP income guidelines (250-300% of Federal Poverty).</p> <ol style="list-style-type: none"> <li>1. Will the Company track how many customers were referred to no-cost CIP or Federal DOE Weatherization Assistance Programs?</li> <li>2. If a significant number of customers are identified as income-eligible for no-cost CIP services:             <ol style="list-style-type: none"> <li>a. Will the Company increase their low-income CIP spending to</li> </ol> </li> </ol>

Response By: Emma Schoppe  
 Title: Local Energy Policy Manager  
 Department: Mng Smr Reg Svc Enrgy Prog  
 Telephone: 612-321-4318

accommodate the increased demand for no-cost, low-income CIP offerings?

- b. Specifically, will the Company consider transferring the proposed \$400,000 contribution to the state energy conservation account (Minn. Stat. § 216B.241, Subd. 7(b)), as described in the Company's CIP modification filing, to existing low-income CIP programs?<sup>1</sup>

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<sup>1</sup>In the Matter of CenterPoint Energy's 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan Docket No. G-008/CIP-20-478 Request to Modify CenterPoint Energy's Conservation Improvement Programs, November 1, 2021, p.5.

**Response:**

1. CenterPoint Energy would be willing to have the Program Operator track and report the number of customers referred to dedicated low-income programs if that is of interest to the Commission or stakeholders.
2. a. Yes, the Company may increase their CIP spending to accommodate increased demand for low-income offerings. The planned budgets described in CenterPoint Energy's filed CIP Triennial Plan are not an implicit cap on customer participation, and the company has flexibility to exceed these amounts to meet demand. If it looks like spending will be above 125 percent of the planned budget, the Company will file a program modification in alignment with Department of Commerce guidance.<sup>1</sup>  
  
b. The Company is not likely to re-allocate \$400,000, planned contribution to the state energy conservation account, to existing low income CIP. As a matter of process, there is a February deadline for paying into the state energy account for 2022 which is not well aligned with when the proposed TOB program would potentially increase CIP participation. The proposed TOB program is more likely to effect CIP participation in 2023, but the Company is not proposing to pay into the state energy account for 2023.

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<sup>1</sup> In the Matter of CenterPoint energy's 2021-2023 Natural Gas Conservation Improvement Program Triennial Plan, Docket No. G-008/CIP-20-478, Decision, Table 27 (Department of Commerce, Nov. 25, 2020).

Docket Number: G008/M-21-377  
 Tariffed On Bill Pilot Program

Date of Request: 11/4/2021  
 Response Due: 11/24/2021

Requested From: CenterPoint Energy Minnesota Gas

Requesting Party: Energy CENTS Coalition (ECC)

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

Request No.	
ECC 02	<p>Reference: Exhibit A, Petition page 15, Exhibit O, Table 3:</p> <p>Exhibit A outlines the principles and objectives for the pilot, including "no up-front payment . . . to participate." On page 15 of the Petition, the Company states that participants must agree to pay \$100 for the Energy Assessment and \$475 for Administrative Services. In addition, in Exhibit O, the Company provides an example of a required \$455 co-pay for the proposed upgrades in that example.</p> <p>Please explain how the required up-front payments and required co-payments are consistent with the pilot objectives and principles.</p> <p><b>Response:</b></p> <p>Exhibit A – City of Minneapolis Tariffed On-Bill Financing Pilot Principles and Objectives Memorandum, Bullet 1, Sub-bullet 1, states, ‘the monthly charge must be lower than the measure’s estimated savings and it remains on the bill for that location until all costs are recovered.’ In order to meet this principle, the total TOB pilot project cost of \$5,889, described in the example in Exhibit O, requires a TOB charge of \$38/month for 12 years with an upfront co-payment of \$455 to recover costs. The Company will work with the TOB program operator, installation contractors, and program partners, including the City of Minneapolis, to reduce the upfront co-payments to zero or minimize upfront co-payment to the extent possible. Pending those partnerships to reduce participant costs, the Company expects that upfront co-payments may be necessary in many cases given its assumptions around TOB pilot costs and energy savings potential.</p>

Response By: Emma Schoppe  
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Regarding the \$100 co-pay, this charge is the same as the customer co-pay for Home Energy Squad services. The Company and the City determined that this charge was necessary to ensure parity between energy efficiency programs operating the same services. Consistent with the Home Energy Squad, this charge will be waived for customers self-certifying as low-income. In addition, it is the Company's understanding that the City contemplates paying this \$100 for City residents as funding allows, as it often does for the Home Energy Squad program.

## Energy Cents Coalition

### Utility Information Request

Docket Number: G008/M-21-377 - Tariffed On Bill Pilot Program

Date of Request: 11/4/2021

Requested From: CenterPoint Energy Minnesota Gas

Response Due: 11/16/2021

Party Requesting Information: Pam Marshall, ECC

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

Request No.	
ECC 04	<p>Reference: Exhibit F</p> <p>1. In Exhibit F, under the "Cost to Participate" section, the Company states:</p> <p>"You may have the option of an upfront co-payment, or you may be eligible for co-payment assistance from a governmental entity or non-profit"</p> <p>Please provide the names of all governmental entities or non-profit organizations that will provide financial assistance for customer co-payments.</p> <p>2. In the same section, the Company states: "however, you will not have an option to make partial or full payment once the Participant Agreement is signed."</p> <p>Please answer the following questions regarding this sentence:</p> <p>a. Does this mean that the participant does not have the option to make any <b>co-payment</b> toward the cost of the energy upgrades after the Participation Agreement is signed?</p> <p>b. If the answer to "a" above is "yes", does this mean that any co-payment amounts will be included in the financing charges?</p> <p>c. If the answer to "b" above is "yes", how will the resulting financing charges meet the programs' 80/20 rule?</p>

Response By: Emma Schoppe  
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3. Is the co-payment required before the Participant Agreement is signed or is it included in the terms of the Participant Agreement? If it is the latter, how long do potential participants have to make their co-payment? Please also answer the last two questions for the \$475 administrative service fee.

**Response:**

1. The Company has not determined the government entities or non-profit organizations that will provide financial assistance for customer co-payments. Pending approval of the TOB pilot petition, the Company's understanding is that the City of Minneapolis is planning to provide financial support for customer co-payments for its residents.
2. a. Correct, the TOB participant will not have the option to make a co-payment that is not described in the TOB Participation Agreement (Exhibits G and H). The Participant Agreement describes the exact payment terms and obligations of TOB pilot participation including any upfront co-payment amount necessary to allow full pilot project costs to be recovered.  
  
b-c. No, co-payment amounts are not included in the financing charges. The pilot participant's monthly TOB charge must pass the 80/20 rule, or 'cost-effectiveness test,' described on page 18 of the TOB pilot petition. The cost-effectiveness test effectively caps the participant's monthly on-bill charge at 80% of the estimated energy savings of their energy efficiency project. The TOB participant will save an estimated 20% of their annual energy cost until the costs of the energy efficiency project are fully recovered. The TOB Participant Agreements (Exhibits G and H) describe any one-time upfront co-payment amount required of the participant to achieve full project cost recovery. Any upfront co-payment amount, as documented in the Participant Agreement, is not included as part of project cost when determining whether a project satisfies the 80/20 rule because it is not financed by CenterPoint Energy or collected over time on the CenterPoint Energy bill.
3. Any upfront co-payment required to participate in the TOB pilot is disclosed in the Participant Agreement (Exhibits G and H) and is collected upon signing the Participant Agreement(s). The program operator will collect any required co-payment amount from the participant. The administrative fee is included in the total cost of the TOB project and may be recovered via monthly payments that meet the cost-effectiveness test.

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Page 3 of 3

**Energy CENTS COALITION**  
**Information Request**

Docket Number: G008/M-21-377  
 Tariffed On Bill Pilot Program

Date of Request: 11/4/2021  
 Response Due: 11/24/2021

Requested From: CenterPoint Energy Minnesota Gas

Requesting Party: Energy CENTS Coalition (ECC)

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

Request No.	
ECC 03	<p>Reference: Exhibit O</p> <p>In Exhibit O, the Company provides a sample list of measures (Table 1) and an example of the costs of those energy upgrades that results in a required \$455 co-payment. What is the total co-pay (in addition to \$455) if the upgrades in Table 1 also included the following measures:</p> <ul style="list-style-type: none"> <li>┆ A bath fan</li> <li>┆ A 96% efficient furnace</li> <li>┆ A 96% efficient furnace and bath fan</li> <li>┆ A 96% efficient furnace and a water heater (0.69)</li> <li>┆ A 96% efficient furnace, water heater, and bath fan</li> <li>┆ A 95% efficient boiler</li> <li>┆ A 95% efficient boiler and exhaust fan</li> <li>┆ A 95% efficient boiler, water heater and exhaust fan</li> </ul> <p><b>Response:</b></p> <p>The TOB pilot petition, page. 18, discusses how the Program Operator will use energy modeling software to perform the cost-effectiveness test to determine eligible TOB payment amounts and co-payments. Energy modeling inputs and outputs such as natural gas savings, electric savings, and measure cost assumptions will not be known until the Request for Proposals process to select a program operator. Therefore inputs provided in Exhibit O – Example Cost-Effectiveness Calculations and this Information Request are intended to be illustrative of reasonable measure savings and costs. The following table provides the requested estimates with the additive measures. For simplicity, no adjustments were made to consider efficiencies of bundled measures.</p>

Response By: Emma Schoppe  
 Title: Local Energy Policy Manager  
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No.	Energy Upgrades	Net TOB Pilot Project Cost (\$)	Total Eligible TOB Pilot Participant Charge (\$)	Participant Upfront Copay Requirement (\$)
1.0	Exhibit O Example	5,889	5,434	455
2.0	Exhibit O Example Update <sup>[1]</sup>	5,864	5,252	612
2.1	w/ bath fan installation	6,244	5,252	992
2.2	w/ 96% efficient furnace	10,428	7,676	2,752
2.3	w/ 96% efficient furnace and bath fan	10,808	7,676	3,132
2.4	w/ 96% efficient furnace and a water heater (0.69)	12,198	7,817	4,381
2.5	w/ 96% efficient furnace, water heater, and bath fan	12,578	7,817	4,761
2.5	w/ 95% efficient boiler	14,062	6,703	7,359
2.7	w/ 95% efficient boiler and exhaust fan	14,442	6,703	7,739
2.8	w/ 95% efficient boiler, water heater and exhaust fan	16,212	6,845	9,367

<sup>[1]</sup> The example in Exhibit O was updated to correct the water heater blanket electric savings assumption from 245 kwh to 99 kwh consistent with Minnesota Technical Resource Manual pgs. 134-136.

**Requested Measure Assumptions:**

**Bath fan installation:**

- 1 Natural Gas Savings: 0
- 1 Electric Savings: No reference
- 1 Cost: \$380 (Source: HomeAdvisor, Inc. Cost to Install Bathroom Fan. Retrieved Nov. 23, 2021, from <https://www.homeadvisor.com/cost/bathrooms/install-a-bath-fan/>).

**96% AFUE Furnace**

- 1 Natural Gas Savings: 22.7 Dth (Source: State of Minnesota (MN) Technical Resource Manual (TRM) for CIP, Version 3.2, pgs. 81-86).
- 1 Electric Savings: 720 (Source: MN TRM, Version 3.2, (pgs. 81-86))
- 1 Cost: \$4,633 (Source: HomeAdvisor, Inc. Furnace Replacement Costs. Retrieved Nov. 23, 2021, from <https://www.homeadvisor.com/cost/heating-and-cooling/install-a-furnace/>).

Response By: Emma Schoppe  
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#### 95% AFUE Boiler

- 1 Natural Gas Savings: 21.6 Dth (Source: MN TRM, Version 3.2, (pgs. 81-86))
- 1 Electric Savings: 0
- 1 Cost: \$8,500 (Source: HomeAdvisor, Inc. New Boiler Costs. Retrieved Nov. 23, 2021, from <https://www.homeadvisor.com/cost/heating-and-cooling/install-a-boiler/>).

#### Water Heater

- 1 Natural Gas Savings: 2.1 Dth (Source: MN TRM, Version 3.2, (pgs. 151-158))
- 1 Electric Savings: 0
- 1 Cost: \$2,000 (Source: HomeAdvisor, Inc. Water Heater Installation Costs. Retrieved Nov. 23, 2021, from <https://www.homeadvisor.com/cost/plumbing/install-a-water-heater/>).

	2022 Proposed (original filing)	2022 Approved	2023 Proposed (original filing)	2023 Approved
<u>CPE Low Income Rental</u>				
<u>Efficiency (LIRE)</u>				
Participants	151	225	151	302
Budget	\$320,810	\$736,214	\$336,478	\$902,956
 <u>CPE Low Income</u>				
<u>Weatherization (LIW)</u>				
Participants	1,304	1,371	1,335	1,403
Budget	\$3,258,440	\$3,933,288	\$3,410,589	4,090,339
 <u>CPE Home Energy</u>				
<u>Squad (HES)</u>				
Participants (Low-income)	377			435
Participants (Renters)	793			915
Participants (Total)	6,500			7,500
Budget (Total)		\$2,683,179		\$2,964,667
 <u>CPE Non-Profit</u>				
<u>Affordable</u>				
<u>Housing Rebate (low-income)</u>				
Participants		465		465
Budget	\$632,893	\$682,893	\$633,517	\$683,517
 <u>Xcel Electric Low-</u>				
<u>Income Spending</u>				
Participants	2022 Approved 7,297	2022 Updated 10,035	2023 Approved 8,140	2023 Updated 10,660
Budget	\$4,288,880	\$5,085,687	\$4,618,815	\$5,521,379

References (CPE) Docket #20-478 CPE Filing Sep 1, 2021, Nov 1, 2021; DOC Decision Jan 31, 2022; Original Filing Jul 1 1, 2020

References (Xcel) Docket #20-473 Xcel Filing Nov 1, 2021; Xcel Filing Dec 17, 2021; DOC Decision Jan 31, 2022; Original Filing Jul 1, 2020

**AFFIDAVIT OF SERVICE**

Pam Marshall certifies that on the 4<sup>th</sup> day of February 2022, she served, by electronic filing, Energy CENTS Coalition Comments In the Matter of a Petition by CenterPoint Energy and The City of Minneapolis to Introduce a Tariffed On-Bill Financing Pilot Program, Docket Number G-008/M-21-377, to the individuals on the attached service list.

*Pam Marshall*

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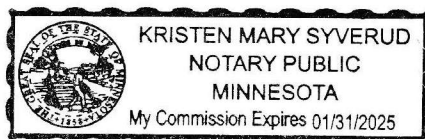
Pam Marshall

*KLS*

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Kristen Syverud

Subscribed and sworn to before me  
this 4<sup>th</sup> day of February 2022



Notary Public

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_21-377_M-21-377
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_21-377_M-21-377
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Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-377_M-21-377
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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	Yes	OFF_SL_21-377_M-21-377
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-377_M-21-377
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Mike	OConnor	moconnor@ibewlocal949.org	Local 949 IBEW	12908 Nicollet Ave S  Burnsville, MN 55337	Electronic Service	No	OFF_SL_21-377_M-21-377
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_21-377_M-21-377
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_21-377_M-21-377
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_21-377_M-21-377
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Emma	Schoppe	emma.schoppe@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicolette Mall  Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-377_M-21-377
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Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-377_M-21-377

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West  Suite 515 St. Paul, Minnesota 55104	Electronic Service	No	OFF_SL_21-377_M-21-377
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Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety	Minnesota Department of Public Safety 445 Minnesota Street Suite 147 St. Paul, MN 55101-1547	Electronic Service	No	OFF_SL_21-377_M-21-377