

July 26, 2022

Deputy Commissioner Kevin Lee
Minnesota Department of Commerce, Division of Energy Resources
85 7th Place East, Suite 500
St. Paul, MN 55101

RE: Center for Energy and Environment's Comments in the Matter of CenterPoint Energy's
Request to Modify its 2021-2023 Conservation Improvement Program

Docket Numbers G-008/CIP-20-478, G-008/21-377

Dear Deputy Commissioner Lee,

Center for Energy and Environment ("CEE") respectfully submits these Comments to the Minnesota Department of Commerce, Division of Energy Resources ("Department") in response to CenterPoint Energy's June 29, 2022 request to modify its 2021-2023 Conservation Improvement Program ("CIP") Triennial Plan.

Background

CenterPoint Energy's (or "the Company") CIP modification request proposes changes to its Low-Income Multi-Family Housing Rebates ("LIMF") and Multi-Family Building Efficiency ("MFBE") programs, including:

- Combining the two programs into a single offering called the Low-Income Multi-Family Building Efficiency ("LI MFBE") program.
- Increasing incentives for income-eligible multi-family properties.
- Offering consistent energy efficiency services to all income-eligible multi-family properties across the CenterPoint Energy territory.
- Adding trade ally incentives to encourage trade allies to promote the program and complete rebate paperwork.
- New energy efficiency measures, including commercial programmable thermostats and air sealing and insulation for attics and walls.
- Increased marketing budgets.

The Company explained in the modification request that the proposed changes are intended to better align conservation offerings for larger multi-family buildings (i.e. five or more units) with

those already offered to income-eligible one-to-four-unit multi-family properties and to enable the Company to meet the new low-income spending requirement.¹

CEE appreciates the Company's interest in improving and expanding services for low-income multi-family properties through its CIP and we support many of the Company's proposed changes including simplifying the service offerings and adding air sealing and insulation measures. CEE and CenterPoint Energy have had numerous discussions about streamlining and expanding CIP services for low-income multi-family properties in anticipation of this filing and as a potential alternative to the Company's proposed Tariffed On-Bill Financing ("TOB") Pilot Program.²

The Company's proposed TOB Pilot Program is a financing program aimed at increasing access to energy efficiency services for renters. Stakeholders to the docket agree that the Company can and should do more to increase access to energy efficiency services for renters. However, the proposed TOB Pilot Program design raises many concerns for CEE and other stakeholders, including the Department, related to consumer protections, cost-effectiveness, cost-recovery, and legality. Moreover, the proposed TOB Pilot Program would create a parallel regulatory framework for energy efficiency investments and cost-recovery. Therefore, CEE and other stakeholders to the proposed TOB Pilot Program docket have encouraged the Company to work through the CIP regulatory framework to expand and improve energy efficiency services for moderate- and low-income homeowners and renters, rather than pursue a separate regulatory process through a TOB model. In fact, the Minnesota Public Utilities Commission ("Commission") ordered the Company to develop a new or expanded low-income CIP proposal focusing on renters in the Company's last rate case.³ It is our understanding that this modification request is the Company's response to the Commission's Order and stakeholder requests. As such, we are filing these Comments in the proposed TOB Pilot Program docket as well as the Company's CIP docket.

Comments

CEE believes that the Company's modification request is a positive step toward improving access to CIP services for renters in the Company's service territory. We are especially pleased that CenterPoint Energy added air sealing and insulation measures to the LI MFBE program. Air sealing and insulation measures are among the most long-lasting and beneficial measures that can be implemented in multi-family properties, especially in small- to medium-sized buildings.

However, we believe that the Company must do more than the proposed changes included in the modification request to adequately meet the needs of renters, especially low-income renters in the Company's service territory. We support streamlining the LIMF and MFBE programs into a

¹ Minnesota Statute 216B.241, Subdivision 7.

² Docket Number G-008/M-21-377

³ Ordering Point nine in the Commission's March 1, 2021 Order in Docket G-008/GR-19-524.

single offering for income-eligible multifamily properties with five or more units and the new building envelope measures proposed for inclusion in LI MFBE. However, we recommend the Department require the Company to increase the incentives proposed in the modification request and make the incentive calculations more transparent and understandable to potential participants by setting incentives at 50 percent of the total project cost; fund pre-weatherization measures through the new proposed LI MFBE program; and expand the Company's other CIP programs and offerings that serve low- to moderate-income renters and homeowners.

1. CenterPoint Energy should provide incentives to LI MFBE participants equal to 50 percent of the total project cost.

On page 2 of the Company's cover letter to the modification request, the Company states that the proposed changes to the LIMF and MFBE program are intended to "better support low-income eligible 5+ unit multi-family properties through the CIP, [and] better align that support with what is offered to customers with low-income eligible 1-4 unit multi-family properties through existing dedicated low-income programs." CEE agrees that the modification request improves upon the Company's current CIP offerings for income-eligible multi-family properties with five or more units. However, the modification request does not align, or even come close to, the relative incentive levels that the Company currently provides for one-to-four-unit, income-eligible multifamily properties.

The Low Income Rental Efficiency ("LIRE") program is the Company's primary offering for income-eligible rental properties with one-to-four units. LIRE offers comprehensive energy efficiency services to property owners, renting to low-income tenants in one-to-four unit dwellings. LIRE provides a free energy audit to participants and then pays, upfront, for 50 percent of the total cost of any recommended energy efficiency upgrades, including attic and wall insulation, air-sealing, exhaust fans, furnaces, boilers, and water heaters. LIRE has proven a successful model for motivating property owners to make energy efficiency improvements to the buildings they own, by providing transparent and easy to calculate incentives that offset half of the total project cost. Importantly, LIRE provides funding directly to contractors upfront so that participants do not have to fund the full project costs and wait for a rebate to be paid at a later date. This component is especially helpful for obtaining project financing.

CEE analyzed the incentive levels that would result through the LI MFBE program, based on the Company's modification request, by applying the proposed incentive structure to several case studies. The case studies represent real multifamily properties that recently completed energy efficiency projects through the 4d Green Cost Share Program⁴ utilizing incentives from CenterPoint Energy and the City of Minneapolis. CEE's analysis of these case studies is included as Attachment A to these Comments. As shown in Attachment A, CenterPoint Energy's proposed

⁴ [https://www.mncee.org/minneapolis-green-4d-cost-share /](https://www.mncee.org/minneapolis-green-4d-cost-share/)

rebate structure for the LI MFBE program would result in rebate levels that represent between 4.6 and 22 percent of project cost.

Based on CEE's knowledge and experience working on energy efficiency services for multifamily properties, we believe that the Company's proposed rebate levels are insufficient to motivate property owners to implement energy efficiency improvements.

Additionally, CEE's analysis highlights the large range of incentive levels that potential participants would receive. The rebate structure included in CenterPoint Energy's modification request is complex, difficult to calculate, and highly variable relative to actual program costs. The rebate structure includes different incentives for each measure implemented, each with its own calculation based on the size of the building and equipment and/or baseline efficiency at the building.

CEE understands that the incentive structure is designed to calibrate incentives to energy savings and improve cost-effectiveness. We agree that such an approach may be appropriate for market rate programs. However, in the low-income multi-family sector, this approach introduces unnecessary uncertainty and confusion, and will limit participation by property owners. Further, the Company could proactively target energy intensive buildings, using energy consumption data, to increase energy savings of the program and improve cost-effectiveness.

CEE believes that the Company's proposed rebates are insufficient to motivate property owners and that the proposed rebate structure is too complicated and confusing to potential participants. Implementing such a rebate structure will limit participation by eligible property owners, which will in turn limit energy efficiency services and the resulting benefits for low-income tenants.

CEE recommends that the Department require the Company to restructure the incentives of the proposed LI MFBE program to be equal to 50 percent of total project costs and paid upfront to project contractors. This incentive structure would result in transparent, understandable rebates at a level that has proven, through LIRE, to successfully motivate property owners.

2. CenterPoint Energy should fund pre-weatherization measures through the proposed LI MFBE program.

Minnesota Statute §216B.241 Subdivision 7(f) states that, "Up to 15 percent of a public utility's spending on low-income programs may be spent on pre-weatherization measures." Pre-weatherization measures include health, safety, and structural improvements needed to complete an energy efficiency improvement. CenterPoint Energy recently received approval from the Department to fund pre-weatherization measures through its Low-Income Weatherization program, LIRE program, and Non-Profit Affordable Housing Program.⁵

⁵ The Department's January 31, 2022 Decision in this docket.

On page eight of the Company's modification request, the Company states, "CenterPoint Energy considered the addition of pre-weatherization measures to the LI MFBE program, but is not planning to allocate budget for completing these measures at this point in time." The Company states that it needs additional time to understand the potential scale of pre-weatherization needed for larger multi-family properties.

CEE understands the Company's concern that pre-weatherization work may be more extensive or expensive in larger multi-family properties as compared to smaller properties. However, pre-weatherization measures have historically been a significant barrier to implementing energy efficiency improvements in income-eligible properties, and thus serving low-income Minnesotans. CEE believes this barrier has occurred for all sizes of income-eligible properties and must be addressed across the various building types and sizes in order to better serve low-income residents.

CEE recommends that the Department require the Company to fund pre-weatherization measures through the LI MFBE program. We believe it may be reasonable to implement a cap on weatherization funding as a percentage of total project cost.

3. CenterPoint Energy should increase the budget and goals for the proposed LI MFBE program for 2023.

Overall, CEE believes that the proposed budget for the proposed LI MFBE program is insufficient to meet the needs of income-eligible multi-family properties with five or more units. With the recommendations we propose above, CEE believes that the Company would be able to increase participation in the proposed LI MFBE program, and serve more low-income tenants in its service territory.

We recommend the Department require the Company to increase the 2023 budget for the proposed LI MFBE program to \$1 million.

4. The Company should expand other CIP offerings for low- to moderate-income renters and homeowners, a need identified by the Company in its Petition to implement a TOB pilot program.

As discussed above, CenterPoint Energy filed a Petition with the Commission to implement a TOB program to increase access to energy efficiency services for renters and homeowners, with a special emphasis on serving renters. The Company's September 1, 2021 TOB Petition, which described the reason a TOB pilot program was needed, stated that renters have been historically underserved by Minnesota's utility-funded energy efficiency programs.⁶

CEE agrees with CenterPoint Energy's statement in its September 1, 2021 TOB Petition that renters have been underserved by existing CIP offerings to-date. However, we do not believe that

⁶ Docket Number G-008/M-21-377

is because the existing CIP framework does not allow for services that reach and address the needs of renters. CEE has stated repeatedly in the TOB docket that the CIP regulatory framework is flexible and well-suited for innovative program design and technologies. We have encouraged the Company to work toward bold solutions for low- and moderate-income renters and homeowners through their existing CIP portfolio.

We appreciate this modification request as a step toward that end, but we believe that this modification request is not sufficient to adequately serve renters in the Company's service territory. Moreover, the scale of this CIP modification request represents a fraction of the Company's proposed TOB pilot program. The Company's latest TOB proposal estimates total program costs of between \$2.6 and \$5.2 million over three years, with no spending cap and proposes to notify the Commission if spending "reaches \$4 million during the first year of the pilot."⁷ In contrast, the proposed LI MFBE program budget reaches only \$500,000 in 2023.

CEE does not understand why the Company is able and comfortable spending millions of dollars on an untested TOB pilot offering to serve renters, but is not willing to propose bolder, bigger offerings and budgets to serve renters through its well-established and successful CIP.

We recommend that the Department require the Company to file additional program modifications or new programs, to be implemented in 2023, to expand and improve services for renters in the Company's service territory.

We note that we made specific recommendations of how to expand CIP services for renters in the TOB Petition docket. Specifically, in the proposed TOB Pilot Program docket, CEE, Energy CENTS Coalition, and Legal Services Advocacy Project jointly recommended that instead of pursuing the proposed TOB pilot program, the Company:

- a. File a proposed low-income CIP program (in Q2 2022) for 5-20 unit buildings with an annual budget of at least \$1,000,000.
- b. Work with interested parties to develop and file, no later than December 31, 2022, CIP offerings to target and better serve low- and moderate-income homeowners and renters.
- c. Propose, no later than December 31, 2022, an expansion of the Low-Income Rental Efficiency program of at least an additional \$1 million each year for one-to-four-unit rental properties.
- d. Increase targeted marketing of its CIP services in Minneapolis Green Zones, with specific focus on increasing customer awareness of geographic eligibility for free CIP services through the company's LIW and LIRE programs.

⁷ Page 5 of the Company's May 13, 2022 Revised TOB Proposal in Docket Number G-008/M-21-377.

- e. Increase targeted marketing of its CIP services in Minneapolis Green Zones, with specific focus on increasing property-owner awareness of geographic eligibility for the company's LIRE program.⁸

Conclusion

In conclusion, CEE thanks the Company for filing the modification request to streamline and expand services through a dedicated LI MFBE program. However, we believe the Company should do more to expand access to energy efficiency services and the benefits energy efficiency provides to renters in its service territory.

CEE recommends that the Department require the Company to:

1. Restructure the incentives of the proposed LI MFBE program, including the added air sealing and insulation measures, to be equal to 50 percent of total project costs and paid upfront to contractors.
2. Fund pre-weatherization measures through the LI MFBE program. We believe it may be reasonable to implement a cap on weatherization funding as a percentage of total project cost.
3. Increase the 2023 budget for the proposed LI MFBE program to \$1 million.
4. File additional program modifications or new programs, to be implemented in 2023, to expand and improve services for renters in its service territory.

We thank the Department for consideration of our Comments and we thank the Company for its engagement and openness throughout the development of this proposed modification.

Please contact me at apartridge@mncee.org with any questions.

Sincerely,

Audrey Partridge

Direct of Regulatory Policy

Center for Energy and Environment

⁸ March 4, 2022 Reply Comments in Docket Number G-008/M-21-377.

Case Studies Analyzing Gas Projects using CenterPoint Energy's Recent Low-Income Multi-Family Building Efficiency Modification Request

CenterPoint Energy filed a modification request¹ to its 2021-2023 Conservation Improvement Program ("CIP") Triennial Plan to modify the Multi-Family Building Efficiency ("MFBE") program to create a low-income specific offering called the Low-Income Multi-Family Building Efficiency ("LI MFBE") program. The new LI MFBE program modification would increase the bonus rebate for income-eligible properties from a 60% bonus over CenterPoint Energy's baseline commercial rebates to a 100% (or double) bonus on CenterPoint Energy's baseline commercial rebates.

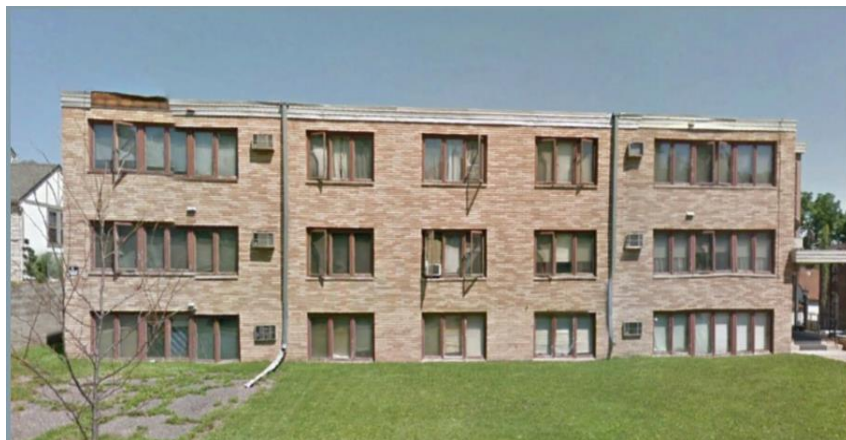
Center for Energy and Environment ("CEE") used the proposed incentive structure from CenterPoint Energy's modification request to analyze the expected incentives for nine different income-eligible multi-family properties. The following properties represent actual multifamily properties that completed energy efficiency upgrades through the City of Minneapolis's 4d Green Cost Share program.²

To determine the new proposed rebates, CEE referenced CenterPoint Energy's website, rebate applications, and emails from the current MFBE implementer. Additionally, the estimated insulation and air sealing rebates included in the case studies below are based on Table 3 provided on page 8 of CenterPoint Energy's modification filing.

CEE calculated the estimated energy savings for each case study below using the Minnesota Technical Reference Manual, actual energy consumption data, existing and new equipment characteristics, property specific information, and heating degree day data. We acknowledge that the following energy savings estimates may differ slightly from CenterPoint Energy's claimed energy savings for these same projects.

¹CenterPoint Energy filed the modification request on June 29, 2022 in Docket Number G-008/CIP-20-478.

² <https://www.mncee.org/minneapolis-green-4d-cost-share>

Property 1: 14 units, project completed in 2018

Project	Actual Cost	Rebate with proposed LI MFBE filing	Percent of project cost covered by LI MFBE rebate	Dth Savings ³
95% AFUE .25 MMBTU Boiler ⁴	\$32,900.00	\$1,750.00	5.3%	100 Dth
Condensing water heater (side arm) ⁵	\$5,000.00	\$0	0%	41 Dth
Total	\$37,900.00	\$1,750.00	4.6%	141 Dth

³ Based on MN TRM

⁴ <https://www.centerpointenergy.com/en-us/Documents/CIP-Rebate-Forms/CNP1095.pdf> CPE commercial boiler rebate application with details about rebate based on boiler size.

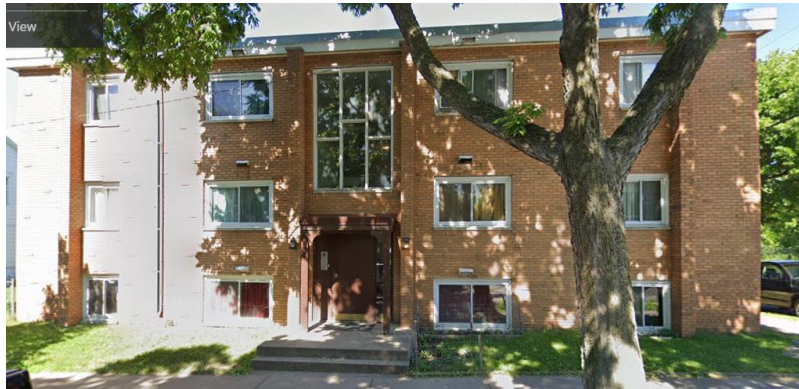
⁵ Though CenterPoint Energy rebates this technology for typical commercial customers, based on an email from the current MFBE implementer, side arm water heaters are not rebate eligible through the LI MFBE program.

Property 2: 11 units, project completed in 2018

Project	Actual Cost	Rebate with proposed LI MFBE filing	Percent of project cost covered by LI MFBE rebate	Dth Savings
95% AFUE .229 MMBTU Boiler	\$13,560.00	\$1,603.00	11.8%	90 Dth
Condensing water heater (side arm)	\$5,000.00	\$0	0%	17 Dth
Wall insulation (3 sides stucco—3888 sq. ft.)	\$8,990.00	\$4,276.80	47.6%	151 Dth
Total	\$27,550.00	\$5,879.80	21.3%	257 Dth

Property 3: 12 units, project completed in 2018

Project	Cost	Rebate with proposed LI MFBE filing	Percent of project cost covered by LI MFBE rebate	Dth Savings
96% AFUE .399 MMBTU Boiler	\$19,554.00	\$2,793.00	14.3%	81 Dth
Condensing water heater (side arm)	\$5,000.00	\$0	0%	17 Dth
Wall insulation (4400 sq. ft.)	\$10,170.00	\$4,840.00	47.6%	207 Dth
Total	\$34,724.00	\$7,633.00	22%	305 Dth

Property 4: 12 units, project completed in 2019

Project	Cost	Rebate with proposed LI MFBE filing	Percent of project cost covered by LI MFBE rebate	Dth Savings
95% AFUE .25 MMBTU Boiler	\$18,917.00	\$1,750.00	9.3%	106 Dth
Condensing water heater (side arm)	\$5,777.00	\$0	0%	28 Dth
Total	\$24,694.00	\$1,750.00	7%	134 Dth

Property 5: 12 units, project completed in 2019

Project	Cost	Rebate with proposed LI MFBE filing	Percent of project cost covered by LI MFBE rebate	Dth Savings
95% AFUE .26 MMBTU Boiler	\$17,902.00	\$1,820.00	10.2%	58.7 Dth
Total	\$17,902.00	\$1,820.00	10.2%	58.7 Dth

Property 6: 12 units, project completed in 2020

Project	Cost	Rebate with proposed LI MFBE filing	Percent of project cost covered by LI MFBE rebate	Dth Savings
95% AFUE .199 MMBTU Boiler	\$20,983.00	\$1,393.00	6.6%	79 Dth
Total	\$20,983.00	\$1,393.00	6.6%	79 Dth

Property 7: 5 units, project completed in 2020

Project	Cost	Rebate with proposed LI MFBE filing	Percent of project cost covered by LI MFBE rebate	Dth Savings
95% AFUE .199 MMBTU Boiler	\$16,289.00	\$1,393.00	8.6%	55 Dth
Condensing water heater (side arm)	\$4,295.00	\$0	0%	10 Dth
Wall insulation (3872 sq. ft.)	\$5,975.00	\$4,259.00	71.3%	116 Dth
Total	\$26,559.00	\$5,652.00	21.3%	181 Dth

Property 8: 12 units, project completed in 2021

Project	Cost	Rebate with proposed LIMF filing	Percent of project cost covered by LI MFBE rebate	Dth Savings
95% AFUE .225 MMBTU Boiler	\$18,960.00	\$1,575.00	8.3%	50 Dth
Condensing water heater	\$5,000.00	\$400.00	8%	14 Dth
Total	\$23,960.00	\$1,975.00	8.2%	64 Dth

Property 9: 5 units, project completed in 2021

Project	Cost	Rebate with proposed LIMF filing	Percent of project cost covered by LI MFBE rebate	Dth Savings
96% AFUE .205 MMBTU Boiler	\$12,507.00	\$1,435.00	11.5%	38.9 Dth
Total	\$12,507.00	\$1,435.00	11.5%	38.9 Dth

AFFIDAVIT OF SERVICE

DOCKET NUMBERS G-008/M-20-478 and G-008/21-377

I, Audrey Partridge, herby certify that on this 26th day of July 2022, I served Center for Energy and Environment's Comments in the Matter of CenterPoint Energy's Request to Modify its 2021-2023 Conservation Improvement Program in Docket Numbers G-008/M-20-478 and G-008/21-377 on the following persons on the attached Service Lists by:

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

XX electronic filing

/s/ Audrey Partridge

Audrey Partridge

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Tony	Hainault	anthony.hainault@co.henn epin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Norm	Harold	N/A	NKS Consulting	5591 E 180th St Prior Lake, MN 55372	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jared	Hendricks	jared.hendricks@owatonna utilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, Minnesota 55401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Dorothy	Barnett	barnett@climateandenergy.org	Climate + Energy Project	PO Box 1858 Hutchinson, KS 67504-1858	Electronic Service	No	OFF_SL_21-377_Official
Sam	Benson	sam@mnipl.org	Energy Access Commenters	4407 E Lake St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-377_Official
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Jocelyn	Bremer	jocelyn.bremer@minneapolis.mn.gov	City of Minneapolis	350 S Fifth St Ste 210 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-377_Official
C. Ian	Brown	office@gasworkerslocal340.com	United Association	Gas Workers Local 340 312 Central Ave SW Minneapolis, MN 55414	Electronic Service	No	OFF_SL_21-377_Official
Edwardo	Cardenas	educardns@gmail.com	Peer Learning Energy Efficiency Energy Cohort	N/A	Electronic Service	No	OFF_SL_21-377_Official
Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-377_Official
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_21-377_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-377_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-377_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Janice	Owens		NARUC Nuclear Waste Program Office	1101 Vermont Avenue, NW Suite 200 Washington,, DC 20005	Paper Service	No	OFF_SL_21-377_Official
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Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, Minnesota 55401	Electronic Service	No	OFF_SL_21-377_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-377_Official
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_21-377_Official
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