

August 8, 2022

**Before the Minnesota 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 No. G-008/M-21-377

**Supplemental Comments of the Energy CENTS Coalition, Center for Energy and Environment,  
and Legal Services Advocacy Project**

**INTRODUCTION**

The Energy CENTS Coalition (“ECC”), Center for Energy and Environment (“CEE”) and Legal Services Advocacy Project (“LSAP”) appreciate the opportunity to provide additional comments to the Minnesota Public Utilities Commission (“Commission”) in the matter of CenterPoint Energy’s (“the Company” or “CPE”) proposed Tariffed On-Bill (“TOB”) pilot program (“Petition”).<sup>1</sup> Our respective organizations, ECC, CEE and LSAP (“Joint Commenters”, or “we”), submitted individual initial comments on February 4, 2022, raising numerous concerns with the Petition. We then jointly responded to other parties’ comments on the Petition through reply comments on March 4, 2022. On May 13, 2022, the Company and the City of Minneapolis (“the City”) then filed a revised proposal for the TOB pilot program (“Revised Proposal”). The Joint Commenters submit the following response to the Revised Proposal and, again, respectfully request the Commission deny the proposal and close the docket.

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<sup>1</sup> On September 1, 2021, CenterPoint Energy filed, jointly with the City of Minneapolis, a proposed Tariffed On-Bill Pilot Program in this docket.

## REPLY COMMENTS

### Introduction

In their Revised Proposal, CPE and the City proposed changes to their initial Petition to respond to comments received from parties. Whereas the original Petition aimed to serve “renters, low- and moderate- income households and communities of color,”<sup>2</sup> the new proposal suggests a target market of:

- “Customers who are high energy users and may reside in under-insulated properties;
- Renters and rental property owners; and
- Moderate income customers, defined as those customers whose incomes exceed eligibility levels for low-income programs but lack ready funds to invest in upgrades.”<sup>3</sup>

This new targeted customer group indicates that the problem CPE and the City seek to address has changed. They still see a need to serve rental properties, but they hope to serve moderate income customers rather than low-income customers. Their proposed solution, however, remains a TOB program rather than expansion of existing Conservation Improvement Program (“CIP”) offerings, which currently serve the very same customers now targeted in the Revised Proposal.

The overall program design contemplated in the Revised Proposal has not fundamentally changed from the Initial Petition. Therefore, the Revised Proposal includes many of the same problems as the initial Petition, and the same program design that was rejected by the Commission in CPE’s last rate case.<sup>4</sup> We find that the Revised Proposal still:

- Imposes unnecessary debt on renters for improvements that can be and are already incented through the Company’s CIP programs.
- Will potentially harm low-income renters and homeowners despite the Company’s reassurance that low-income households are now not their target market.
- Includes very high upfront costs which will undermine participation, thus wasting ratepayer investments while causing customer confusion.
- Is not cost-effective (nor does CPE and the City claim or design the model to be cost-effective). The Company already delivers residential, low-income, and rental energy efficiency programs that meet the requirements and oversight of the Department of Commerce, Division of Energy Resources (“Department”) and deliver successful results.
- Unnecessarily creates a new complex and costly administrative structure to deliver energy efficiency services, effectively duplicating an existing, mature, successful program that can be modified and expanded to deliver additional services to the populations targeted by the proponents.

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<sup>2</sup> Pages 5-6 of the Company’s September 1, 2021 Petition to this docket.

<sup>3</sup> Page 5 of the Company’s May 13, 2022 Revised TOB Proposal to this docket.

<sup>4</sup> Docket Number G008/GR-19-524

- Creates a host of practical and significant legal concerns that have not been mitigated by the revised proposal.
- Allows the company to earn more for their investment than their residential and low-income CIP programs, and in fact potentially earn twice on the same set of project investments.

As in our initial comments and reply comments, we ask that the Commission reject the Petition and Revised Proposal and instead order the Company to better serve moderate-income renters and homeowners through enhanced investments in the Company's existing CIP portfolio. Our specific recommendations are listed in the conclusion of these comments.

### **Remaining Problems with the Revised Proposal**

The Joint Commenters raised a series of concerns and objections to CPE and the City's initial Petition. While revisions to the Petition have addressed one important concern, many other problems remain. We summarize below how the Revised Proposal addressed or did not address these issues.

#### **1. Imposition of Debt Obligations on Customers that Qualify for Free Weatherization**

The Revised Proposal fails to address the concerns we raised in both initial comments and in reply comments that the CPE TOB proposal does not expand access to energy improvements for low- and moderate-income customers. Rather, the proposal imposes long term debt obligations on customers who may otherwise qualify for free weatherization services through CPE's low-income programs. This is true for participants who enter into a TOB agreement, as well as for subsequent tenants and homeowners of that property over the life of the TOB obligation.

In response to this concern, the Company states in their Revised Proposal, "The Company and Program Operator will work to establish strong pathways to Low Income CIP and [Weatherization Assistance Program] early in the process for customers to support interest in and understanding of eligibility for such programs."<sup>5</sup> The addition of this sentence in the revised proposal does little to allay the concerns we raised that customers eligible for free services will wind up with unnecessary debt.

Without programmatic protocols to assure that no customer eligible for free or lower cost services would wind up as a TOB participant, the commitment to make an effort – rather than guarantee the desired result – is hollow.

We remain concerned that qualified low-income customers will end up with long term debt obligations through the TOB program, particularly in the harder to serve rental market. We

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<sup>5</sup> Page 6 of the Company's May 13, 2022 Revised TOB Proposal to this docket.

suggest again that rather than market a program that relies on high tenant co-payments and long term debt, that CPE could better serve this group of customers by expanding its current rental CIP programs.

At the January 12, 2021 Commission agenda meeting regarding CenterPoint Energy's TOB proposal in its last rate case,<sup>6</sup> Commissioner Sullivan expressed a strong preference for a CIP-based solution. His motion to require CPE to "develop a (or expand an existing) low-income CIP proposal under Minn. Stat 216B.241 subd 7, focusing on renters" was supported by all Commissioners. We continue to support this approach.

## **2. CPE Filed an Updated and Improved CIP Proposal for Low-Income Rental Properties**

On June 29, 2022, CPE filed a request to modify its 2021-2023 Conservation Improvement Program ("CIP") Triennial Plan with the Department.<sup>7</sup> The modification request proposed several changes to streamline and expand its Low-Income Multi-Family Housing Rebates ("LIMF") and Multi-Family Building Efficiency ("MFBE") programs to better serve low-income rental properties with five or more units. While the modification request does not include all the recommendations Joint Commenters included in our March 4, 2022 Reply Comments in this docket, it is a positive step toward expanding CIP offerings to low-income renters. Moreover, it illustrates the opportunity to address the needs of low- to moderate-income renters through improved program design and expanded services in the Company's CIP and underscores the questionable wisdom of creating a brand new program at ratepayer expense.

We encourage all parties to this docket to engage with the Company's CIP triennial docket to further improve and expand upon the Company's proposed modifications to meet the customer needs identified through this docket.

## **3. Cost Burdens on Participants: Upfront Charges and Co-Payment Requirements**

In Comments, ECC and CEE provided extensive analysis summarizing the significant upfront participant costs required by the Company's TOB proposal.<sup>8,9</sup>

The Company responded to concerns about high upfront payments by eliminating the proposed \$100 customer copay, and the \$475 participant charge for program operator costs. In the Revised Proposal, these costs were merely shifted from participants to ratepayers. While this change does reduce participant costs, it does not have a significant effect on overall upfront participant costs because the upfront costs are largely a result of program design.

Upfront participant costs of the TOB proposal are driven by:

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<sup>6</sup> Docket Number G008/GR-19-524

<sup>7</sup> Docket Number G-008/CIP-20-478

<sup>8</sup> Pages 4-6 of ECC's February 4, 2022 Comments in this docket.

<sup>9</sup> Page 6 of CEE's February 4, 2022 Comments in this docket.

1. the cost of the project;
2. the need for TOB to stretch payments over 12 years in order to meet the “80/20 rule,” where the sum of the customer’s monthly charges must be less than 80 percent of the total estimated savings; and
3. the Company’s high capital costs.

No changes were made to the basic program design to reduce high upfront participant costs. A program with this design is inappropriate for low-income customers and renters and does little to add value to programs that CPE already offers for moderate-income households, which better address upfront project costs.

Implementing a program, completely outside of the CIP process, with such a fatal flaw in its program design is not a good use of ratepayer funds and will result in customer confusion, potentially undermining participation in CIP.

#### **4. Any Energy Savings Achieved Are Not Cost-Effective**

CEE provided extensive analysis as to why the Company’s TOB proposal was not cost-effective.<sup>10</sup> The analysis focused on the societal, utility, and participant tests, the cost-effectiveness tests Minnesota’s utilities and the Department apply to CIP.

In response, the Company stated that “the model used to analyze CIP measure cost and benefit...is not well suited to analyze the cost effectiveness of the proposed pilot.” CPE claims that it is not a “like-to-like comparison” because TOB addresses the full conservation measure costs, whereas the Company’s CIP programs address incremental costs. They state, “it is more appropriate to compare TOB to CenterPoint Energy’s low-income programs, but even in this case, the comparison is not entirely reasonable.” This is because other low-income programs use “both utility funding and funding from the Weatherization Assistance Program. Because TOB does not leverage such funds, the Company and participants would bear the full costs of the proposed pilot.”<sup>11</sup>

We provide the following responses to the Company’s assertions. First, we note that CEE’s cost-effectiveness analysis compared the TOB proposal to a number of successful CPE CIP programs. The most similar of those programs is the Low Income Rental Efficiency (LIRE) program, which serves low-income rental properties and does not utilize any funding from the Weatherization Assistance Program. LIRE is fully funded through CPE’s CIP and it serves the same customer base as the Company’s initial proposal. As shown in CEE’s February 4, 2022 Comments, LIRE does so much more cost-effectively, both with regard to the utility and its customers as well as program participants, than the proposed TOB program.

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<sup>10</sup> Pages 4-9 of CEE’s February 4, 2022 Comments in this docket.

<sup>11</sup> Page 6 of Exhibit A in the Company’s May 13, 2022 Revised TOB Proposal to this docket.

Second, many of the drivers for TOB's cost-ineffectiveness are due to program design choices such as 12-year payment periods, high administrative and start-up costs, and the high cost of capital. While the company has reduced start-up costs in its Revised Proposal, it also estimates reduced participation and savings. Thus, costs on a per participant and per dekatherm basis remain very high.

Unless the Company can present an analysis that demonstrates the proposed TOB program is beneficial to ratepayers, and certainly to participants, our serious concern about approval of a cost-inefficient program remains.

## **5. The Proposal Inappropriately Shifts the Existing Responsibility for Energy Efficiency from Landlords to Tenants (Including Subsequent Tenants)**

The Joint Commenters all raised concerns about the transfer of responsibility and cost of heating and water heating equipment from landlords onto tenants. Existing CIP programs such as the Company's LIRE and MFBE programs work to address the "split incentive problem" where landlords will not invest in efficiency because they do not realize all the benefits. LIRE has been particularly successful at addressing the split incentive. As ECC noted in February 4, 2022 Comments, "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)."<sup>12</sup> This transfer of responsibility was not addressed in the Revised Proposal.

In addition to being unfair to tenants, we question its legality. LSAP noted very specific legal concerns on this issue related to the "covenants of habitability" in landlord-tenant law, which requires landlords to provide specific provisions including space heating. LSAP also noted that the way the proposed TOB tariff attempts to intervene in landlord-tenant law is outside the scope of a utility tariff and is unconstitutional in Minnesota.<sup>13</sup> None of these legal concerns were addressed in the Revised Proposal.

## **6. Charges Tied to the Meter Create a Host of Practical and Legal Concerns**

Under the Company's proposal, and unchanged in the Revised Proposal, TOB charges are tied to the utility meter rather than to a customer. This raises a number of legal problems discussed in LSAP's February 4, 2022 initial comments in this docket, such as:

- The tariff cannot bind future tenants to a contract that a current tenants signs. Nor can a property owner tie a future owner to a contract they had no role in. The Company's attempt to address these issues through signed agreements does not override existing property law.

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<sup>12</sup> Page 10 of ECC's February 4, 2022 Comments in this docket.

<sup>13</sup> Page 11 of LSAP's February 4, 2022 Comments in this docket.

- The tariff allows a homeowner to break a purchase agreement if the required notice is not provided to the buyer. CenterPoint Energy has no authority to grant rights to homebuyers regarding property law.
- The tariff allows a tenant to break a lease if the required notice was not provided. CenterPoint Energy has no authority to make or violate Minnesota law or create or interfere with leases to which they are not signatories.
- The very basic premise of TOB – to transfer debt from one customer to the next – is specifically disallowed by the Minnesota Supreme Court, which declared “[in] absence of lien or contract, [a] utility may not impose obligation of payment for utility services on someone other than one who actually incurred debt.” See Cascade Motor Hotel, Inc. v. City of Duluth, 348 N.W.2d 84, 84 (1984).

In its January 11, 2022 Comments in this docket, the Minnesota Realtors also note the legal flaws in the Company’s proposal, finding them “breathtaking.”<sup>14</sup>

In addition to the legal flaws, LSAP and Minnesota Realtors both establish in this docket that charges tied to the meter impose serious practical concerns for the sale of properties. Minnesota Realtors stated:

“Setting aside the obvious lack of legal authority and constitutionality for a moment, it is also important to consider the impact this TOBF pilot program would have on typical owners/sellers and successor owners/buyers, as it relates to the real estate transaction, which will become more complicated and difficult if this pilot program is approved.”<sup>15</sup>

The Minnesota Realtors go on to list five practical concerns that will inhibit the ability of owners with these meter charges to easily sell their properties, such as notice never being properly given, reduction in the pool of buyers, the potential for delay, additional costs, and litigation.

In the January 12, 2021 Commission agenda meeting regarding CenterPoint Energy’s TOB proposal in its last rate case,<sup>16</sup> Commissioner Means noted these issues and urged the company to address them in any subsequent TOB proposal, stating “Complications homebuyers would face purchasing property that is subject to an open loan obligation. That’s unreasonable. A lot needs to be developed ... in this regard.”

The company addressed none of these issues in its Revised Proposal.

## **7. Disallowance of Prepayment**

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<sup>14</sup> Page 2 of Minnesota Realtors January 11, 2022 Comments in this docket.

<sup>15</sup> Page 2 of Minnesota Realtors January 11, 2022 Comments in this docket.

<sup>16</sup> Docket Number G008/GR-19-524

Some of the practical concerns around transfer of property could be eliminated by allowing a seller to pre-pay the remaining balance of the tariff at the time of sale, much like a seller would do of any mortgage when they sell a property. However, the Revised Proposal continues to disallow pre-payment. Page 11 of the Company's May 13, 2022 Revised Proposal states, "It is fundamental to the operation of TOB programs that TOB charges are treated like payment for any other utility service. TOB does not create a debt that can be prepaid but a tariffed charge."

It is not reasonable to disallow pre-payment of any debt, particularly at the time of sale of a property.

## **8. Cost Shifts to Nonparticipant Ratepayers**

Both ECC and CEE provided analysis in their initial comments as to how expensive CPE's initial proposal was, including very high delivery costs, administrative costs, cost of capital, and start-up costs.

In its Revised Proposal, the Company reduces the number of participants from 500 per year over 3 years (total of 1,500) to a total of 250-500 customers. This significantly reduces the overall size and cost of the pilot and lowers costs for ratepayers. However, by moving the \$475 program fee from participants to ratepayers, ratepayer costs as a proportion of total costs increase.

Additionally, the Company indicates the budget is an estimate and not a cap. CPE estimates total costs of \$2.6-\$5.2 million and propose notifying the PUC if spending "reaches \$4 million during the first year of the pilot."<sup>17</sup> However, it is not clear in the revised proposal whether this is truly a reduced budget, as the Company presents these figures as "estimates" and suggests they have the flexibility to go above their estimates by simply issuing notice.

In the January 12, 2021 Commission agenda meeting regarding CenterPoint Energy's TOB proposal in its last rate case,<sup>18</sup> Chair Sieben urged the Company to discuss a cap on ratepayer costs and a discussion of how the program would impact ratepayers. Similarly, Commissioner Tuma expressed concern about ratepayer funds and the Company's cost of capital being used for a TOB program, stating, "To raise capital, Commissioner Sullivan, you also have to incur costs. The idea...of shifting those costs, socializing them across the whole of the ratepayers is just the wrong way to raise it."

The Company did not adequately address issues related to costs or cost shifting in their September 1, 2021 Petition, or the May 16, 2022 Revised Proposal. As summarized in our earlier comments, bolstering the Company's successful CIP programs is a better, more cost-effective solution for participants and ratepayers alike.

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<sup>17</sup> Page 5 of the Company's May 13, 2022 Revised TOB Proposal to this docket.

<sup>18</sup> Docket Number G008/GR-19-524

## **9. Necessity for Accurately Predicting Energy Savings**

LSAP and CEE both noted that energy savings predicted by CPE's program administrator may not in fact materialize in part, if not exclusively, because energy savings modeling tools, particularly for residential properties, are not precise and accurate enough. CEE noted in its February 4, 2022 initial comments to this docket that national evaluations of residential energy modeling tools often note a margin of error between ten and 30 percent.

A guarantee of savings is essential to meeting the promise TOB makes to the participating customer that their payment will be 80 percent or less of estimated bill savings. There is nothing new in the Revised Proposal to address the potential for inaccuracy. As it stands, the same program administrator that estimated the savings will determine why the savings did not materialize. We believe the proposed protections for participants are inadequate to address the potential for inaccurate modeling.

At the January 12, 2021 Commission agenda meeting regarding CenterPoint Energy's TOB proposal in its last rate case,<sup>19</sup> Chair Sieben noted the importance for accuracy and assurance of savings for low-income customers. Chair Sieben asked the Company to strive for a "hold harmless guarantee, particularly for low-income customers." Chair Sieben stated, "there should be ongoing, verifiable savings monitored throughout the obligation repayment period so that low-income participants are held harmless in the event of underperformance of installed improvements."

Unfortunately, nothing in the Company's Revised Proposal has improved the guarantee that customers will realize savings or, at the very least, be held harmless.

## **10. The Revised Proposal Unreasonably Allows CPE to Earn Both a Rate of Return and a CIP Financial Incentive for the Same Energy Efficiency Improvement**

In initial comments, CEE noted that it is unreasonable for the Company to earn a rate of return on a utility investment in an efficiency project, and then earn a financial incentive on a CIP program for that same investment. It is a double-dipping of financial incentives. The Office of the Attorney General ("OAG") noted a similar concern.

The Company responded to that concern by stating, "no rate of return will be recovered from that portion of project cost that is covered by CIP."<sup>20</sup>

This does not address the concern that CEE and the OAG raised. A utility earns a CIP incentive on the utility net benefits (cost minus benefits) for each project in a utility portfolio. They do not earn a separate rate of return on the investment itself. That is true whether they make a minimal investment in a project (like a furnace rebate), or a major investment in a project (like a low-income customer's home weatherization). In the case of the proposed TOB program,

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<sup>19</sup> Docket Number G008/GR-19-524

<sup>20</sup> Page 4 of Appendix A in the Company's May 13, 2022 Revised TOB Proposal to this docket.

CenterPoint Energy would continue to earn a CIP incentive on program net benefits due to the customer's participation in their CIP program and they will earn a rate of return for an upfront investment in the full cost of that project.

The Company's cost-recovery proposal represents a double return on TOB projects and is not reasonable.

#### **11. Disconnection of Service for Nonpayment of TOB Charges**

In initial comments in this docket, each of our organizations expressed concern that customers who missed payments under the TOB tariff would be subject to service disconnection. We raised these concerns again, as well as related legal concerns, in our March 4, 2022 Joint Reply Comments. We were relieved to see in the Revised Proposal that the Company "will not disconnect TOB Pilot Participants for non-payment of the TOB portion or their utility bill."<sup>21</sup>

The Revised Proposal removes some concern about placing TOB participants at risk of disconnection. However, the question of how the Company will treat a partial payment of a participant's total utility bill remains unanswered. To ensure the continuation of service, a customer's partial payment should be applied to the provision of natural gas service before being applied to TOB charges. If the Commission approves a TOB program, it should require partial payments to be applied to the provision of natural gas service first.

### **CONCLUSION**

The Joint Commenters agree that the Company should expand and improve its energy efficiency services for low- to moderate-income renters and homeowners. We support doing so through innovative program design and increased funding. However, we believe such efforts should be done through Minnesota's well-established and successful CIP framework. CIP provides a regulatory framework that includes protections for participants, as well as ratepayers, with oversight by the Department.

At this point, there is no need to develop a parallel regulatory framework for energy efficiency services, especially one that is more expensive for both participants and ratepayers, lacks important consumer protections, and presents the legal and practical issues outlined above.

We encourage the City and other stakeholders to this docket to engage with the Company on potential modifications to its current CIP Plan, in the development of its upcoming CIP triennial plan, and with the CIP regulatory process generally. The CIP framework is flexible and well-suited for many of the innovative ideas presented in this docket. At the same time, CIP provides a low-cost mechanism for cost-recovery, established cost-effectiveness practices, and strong

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<sup>21</sup> Page 8 of the Company's May 13, 2022 Revised TOB Proposal to this docket.

regulatory oversight by the Department to ensure participants and ratepayers receive the benefits of CIP investments.

The Joint Commenters respectfully recommend that the Commission:

- a. Find that the TOB program is not in the public interest and deny the TOB Petition.
- b. Require CPE to file a proposed low-income CIP program (in 2022) for 5-20 unit buildings with an annual budget of at least \$1,000,000.
- c. Order CPE to 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.
- d. Order the Company to, no later than December 31, 2022, propose an expansion of the LIRE program of at least an additional \$1 million each year for one-to-four-unit rental properties.
- e. Order the Company to, as soon as possible, 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.
- f. Order the Company to, as soon as possible, 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.

Respectfully submitted,

August 8, 2022

/s/ Pam Marshall  
Executive Director  
Energy CENTS Coalition

/s/ Audrey Partridge  
Director of Regulatory Policy  
Center for Energy and Environment

/s/ Ron Elwood  
Supervising Attorney  
Legal Services Advocacy Project

## **AFFIDAVIT OF SERVICE**

**DOCKET NO. G-008/M-21-377**

I, Audrey Partridge, hereby certify that on this 8<sup>th</sup> day of August 2022, I served Energy CENTS Coalition, Center for Energy and Environment, and Legal Services Advocacy Project's Supplemental Comments in the Matter of a Petition by CenterPoint Energy and the City of Minneapolis to Introduce a Tariffed On-Bill Financing Pilot Program in Docket Number G-008/M-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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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

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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-377_Official
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