

September 15, 2022

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

VIA ELECTRONIC FILING

**Re: In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers
Docket No. G-999/CI-21-135**

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

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

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

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

Gas Utilities Joint Initial Comments in Response to August 23, 2022 Notice

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas, Northern States Power Company, a Minnesota Corporation ("Xcel Energy"), Minnesota Energy Resources Corporation ("MERC"), and Great Plains Natural Gas Co. ("Great Plains") (collectively, the "Gas Utilities") respectfully submit this joint filing in compliance with the Minnesota Public Utilities Commission's August 23, 2022 Notice of Comment Period issued in the above-referenced dockets.

Sincerely,

/s/ Seth DeMerritt
CenterPoint Energy
Manager, Regulatory Affairs

/s/ Travis Jacobson
Great Plains Natural Gas Co.
Director of Regulatory Affairs

/s/ Richard Stasik
Minnesota Energy Resources Corporation
Director-State Regulatory Affairs

/s/ Lisa Peterson
Xcel Energy
Director, Regulatory Pricing & Analysis

Enclosure
cc: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben
Valerie Means
Matthew Schuerger
Joseph Sullivan
John Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

IN THE MATTER OF A COMMISSION
INVESTIGATION INTO THE IMPACT OF
SEVERE WEATHER IN FEBRUARY 2021
ON IMPACTED MINNESOTA NATURAL
GAS UTILITIES AND CUSTOMERS

DOCKET NO. G999/CI-21-135

IN THE MATTER OF THE PETITION BY
CENTERPOINT ENERGY FOR
APPROVAL OF A RECOVERY PROCESS
FOR COST IMPACTS DUE TO FEBRUARY
EXTREME GAS MARKET CONDITIONS

DOCKET NO. G008/M-21-138

IN THE MATTER OF THE PETITION BY
GREAT PLAINS NATURAL GAS CO., A
DIVISION OF MONTANA-DAKOTA
UTILITIES CO., FOR APPROVAL OF
RULE VARIANCES TO RECOVER HIGH
NATURAL GAS COSTS FROM FEBRUARY
2021

DOCKET NO. G004/M-21-235

IN THE MATTER OF A PETITION OF
NORTHERN STATES POWER COMPANY
D/B/A XCEL ENERGY TO RECOVER
FEBRUARY 2021 NATURAL GAS COSTS

DOCKET NO. G002/CI-21-610

IN THE MATTER OF THE PETITION OF
MINNESOTA ENERGY RESOURCES
CORPORATION FOR APPROVAL OF A
RECOVERY PROCESS FOR COST
IMPACTS DUE TO FEBRUARY EXTREME
GAS MARKET CONDITIONS

DOCKET NO. G011/CI-21-611

**GAS UTILITIES' JOINT INITIAL
COMMENTS**

INTRODUCTION

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy”), Northern States Power Company, a Minnesota corporation (“Xcel Energy”), Minnesota Energy Resources Corporation (“MERC”), and Great Plains Natural Gas Co. (“Great Plains”) (individually, a “Gas Utility” and collectively, the “Gas Utilities”) submit to the Minnesota Public Utilities Commission (“Commission”) this joint filing in response to the Commission’s August 23, 2022, Notice of Comment Period (“Notice”). The Commission’s Notice requested that the Gas Utilities review their gas contracting, purchasing, hedging, storage, peak-shaving, interruptible, customer communications, and other relevant practices and, by September 15, 2022, file a plan explaining how they can improve or modify their practices to protect customers from extraordinary natural gas price spikes in the future.

The Commission’s Notice also requested that the Gas Utilities identify the timeline for implementation of proposed modifications, whether tariff or statutory changes are necessary, and if so, whether they are consistent with the Natural Gas Innovation Act (Minn. Stat. §§ 216B.2427 and 216B.2428); whether integrated resource planning could be implemented to protect customers from future price spikes; and whether the utilities have considered filing a performance-based gas purchasing plan pursuant to Minn. Stat. § 216B.167.

Through this filing, the Gas Utilities first outline a proposed trigger that could be implemented to provide for price-based economic supply decisions, such as price-based curtailment of interruptible customers, in response to a future extraordinary price spike. Second, the Gas Utilities discuss statutory or rule changes that could be implemented to protect customers from future extraordinary price spikes. And finally, the Gas Utilities describe the history of utility performance-based gas purchasing plan filings under Minn. Stat. § 216B.167.

Each of the Gas Utilities will also individually file a plan with Commission, in compliance with the Commission’s Notice.

I. ECONOMIC TRIGGER

The Gas Utilities propose the following trigger to be implemented upon Commission approval for the curtailment of interruptible system sales customers in response to prices. In their individual filings, each of the Gas Utilities will provide proposed tariff sheets for approval and will address any other circumstances under which they propose to apply the trigger. The economic trigger is as follows, with each of the Gas Utilities identifying the specific pricing hub(s) to be included in their individual filings and tariffs:

The prior gas day (or multiple days in the case of weekends and holidays) settled Gas Daily daily index price at [any of the identified pricing hub(s) where the utility would purchase daily supplies]:

1. is greater than or equal to \$50.00 per Dth; and
2. is greater than or equal to five times the weighted average cost of gas forecast for the month at issue in the utility's filed PGA for that month.

Gas is purchased roughly 24 hours before customers start to use the gas we purchase, in a day-ahead market that is closed over the weekend and on holidays.¹ Daily purchases of index-priced natural gas supplies generally occur prior to 9 a.m. on the day-ahead. The index price is not published until later in the evening on the day-ahead market, by which point gas purchases have been completed and the Gas Utilities are unable to adjust purchased volumes. Due to the nature of the gas day and the fact that daily index prices are not published until after purchases have been made and trading has closed, the Gas Utilities propose to initiate economic curtailments and other actions in response to extraordinary price spikes beginning the second gas day of a pricing event when the above trigger conditions occur.² This timing will give utilities and customers adequate time to implement dispatch and interruption actions. Natural gas spot market prices might not remain elevated past the first day or days (in

¹ While utilities are generally able to buy for the day ahead Monday through Thursday, on Fridays we are buying the gas supply necessary to serve their customers' needs for three days (i.e., Saturday through Monday) or more depending if gas markets are closed for holidays.

² For instance, if the triggers are met based on the settle price of gas purchases over a weekend for gas purchased Friday and delivered Saturday-Monday, the Gas Utilities propose to call curtailments beginning Tuesday at 9 a.m. In the case of a weekend with a Monday holiday, this would mean calling curtailments beginning at 9 a.m. on Wednesday.

the case of weekends and holidays) after a spike in index prices, in which case planning to take certain price-based decisions once the spike is known (on the second day of the event) may not result in significant avoided costs.

II. STATUTE AND RULE CHANGES

The Commission requested that the Gas Utilities identify any statute or rule changes necessary to help protect customers from extraordinary natural gas price spikes.

As the Commission is aware, during the 2022 legislative session, the Gas Utilities advocated at the Legislature for adoption of a sales tax exemption for the February Market Event surcharge for residential heating customers. The bill (House File 4650/Senate File (“SF”) 3691) was included in the SF 4091 conference committee report, but ultimately did not pass and therefore did not become law. The Gas Utilities believe adoption of the sale tax exemption is one way to protect customers from the impacts of the February 2021 extraordinary pricing event and propose to lobby in support of this legislation again in the next legislative session.

The Gas Utilities have also reviewed existing statutes and rules, focusing especially on the Annual Automatic Adjustment (“AAA”) of charges and Purchased Gas Adjustment (“PGA”) rules found in Chapter 7825 of the Minnesota Administrative Code. The current rules stem from FERC Order No. 436, which ultimately led to wellhead gas deregulation. Approximately one month after FERC issued Order No. 436 in October 1985, the Commission initiated proceedings in Docket No. G999/R-84-789 to review its PGA rules to determine whether amendments were appropriate in light of FERC Order 436. The Commission made clear that any amendments to its PGA rules:

[S]hould be designed to achieve certain objectives, including the following:

- Firm customers of local distribution companies, including residential customers, must be assured of a reliable supply of natural gas at all times.
- Local distribution companies should obtain the most economical “mix” of delivered gas supplies consistent with the reliability objective stated above.
- Local distribution companies which make good faith attempts to carry out the above objectives through innovative purchase agreements should not be

at greater risk of non-recovery of their costs of purchased gas than those which continue to purchase from the pipeline as usual.

- Unreasonable and imprudent purchased gas costs should not be passed through to consumers.
- Local distribution companies should not transport gas on behalf of end-users unless that transportation provides benefits to companies' retail sales customers.³

A review of the proceeding in Docket No. G999/R-84-789 demonstrates that the Commission had a robust record, with numerous filings not only from the natural gas utilities at the time, but also the Attorney General's Office, the Department of Public Service (the predecessor agency to the Department of Commerce), and large natural gas customers. The Commission also had engaged a task force of interested stakeholders. Through that proceeding, the Commission also considered but ultimately declined to adopt recommendations from the OAG to pass through only a portion of the gas commodity costs incurred.⁴

When the Commission adopted amendments to the PGA rules, their objectives were rightly focused on providing reliable and economical natural gas supply to customers, with a process to ensure that unreasonable and imprudent purchased gas costs should not be passed through to customers.

In Docket No. G999/CI-95-696, the Commission again reexamined the PGA rules to ensure they still served the public interest and met regulatory objectives, in light of federal action deregulating gas prices at the wellhead and requiring interstate pipelines to carry gas from unaffiliated suppliers. Based on its review, the Commission concluded that the PGA rules continued to be in the public interest, as gas prices continue to fluctuate significantly for reasons beyond the natural gas utilities' control.

Eliminating utilities' ability to adjust for price fluctuations would lead to more frequent rate cases, at significant cost to all parties. It would cause under- and over-recovery of gas

³ *Purchased Gas Adjustment Rules*, Docket No. G999/R-85-789, Outside Opinion Sought on Purchased Gas Adjustment Rules (Nov. 8, 1985).

⁴ *Purchased Gas Adjustment Rules*, Docket No. G999/R-85-789, Comments of the Office of Attorney General on Purchased Gas Adjustment (Jan. 16, 1985).

costs between rate cases. It could increase utilities' cost of capital, since investors could perceive utilities' inability to pass through gas price increases as an increased business risk. It could cause rate shock, since gradual increases in the price of gas could no longer be reflected as they occurred, but only in one-time rate increases.⁵

The Gas Utilities do not believe that changes to the AAA or PGA rules are needed at this time, nor have the Gas Utilities identified any specific rule changes at this time that would help to protect customers from daily gas price spikes. To the extent the Commission disagrees, the Gas Utilities request that the Commission engage in a robust process as it did the last time rule changes were considered, especially considering all of the other policy discussions about natural gas regulation (e.g., the Natural Gas Innovation Act; the Future of Gas docket) currently pending.

III. HISTORY OF PERFORMANCE-BASED GAS PURCHASING STATUTE

The Commission's Notice also requested the Gas Utilities provide an analysis of whether they considered filing a plan pursuant to Minn. Stat. § 216B.167, Performance-Based Gas Purchasing Plan, and their analysis of why they are not using the statute if they have chosen not to proceed with such a plan. The Gas Utilities provide the following discussion of the history of Minnesota's performance-based gas purchasing statute, Minn. Stat. § 216B.167. Each of the Gas Utilities will also discuss whether they have considered proposing a performance-based gas purchasing plan in their individual filing.

Beginning in the 1990s, a number of states implemented incentive mechanisms for utility natural gas supply procurement. These mechanisms were designed to eliminate the need for detailed and costly prudence reviews and to provide a means to reward utilities for economic risks associated with providing natural gas supplies.

In 1995, the Minnesota Legislature passed Minnesota Statute § 216B.167, authorizing the Commission to approve "performance-based gas purchasing" plans proposed by Minnesota's gas utilities according to the criteria set out in that section. Minnesota

⁵ *In the Matter of an Investigation into Whether the Purchased Gas Adjustment (PGA) is Still Appropriate*, Docket No. G999/CI-95-696, Order Concluding Investigation and Closing Docket at 2-3 (Nov. 18, 1996).

Statute § 216B.167 was adopted in response to federal action deregulating gas prices at the wellhead and requiring interstate pipelines to carry gas from unaffiliated suppliers, to permit utilities and ratepayers to share in new opportunities being created by the deregulation of natural gas supply to lower PGA related costs.⁶

Section 216B.167 requires performance-based gas purchasing plans to include reasonably attainable benchmarks, a sharing mechanism, and a proposal for how the plan will be evaluated. In particular, the statute requires:

- Incentives for the natural gas utility to achieve lower natural gas costs than would have been achieved in the absence of the plan;
- A provision to share the potential benefits of the plan among each customer class purchasing firm natural gas service from the utility;
- One or more benchmarks against which natural gas costs would be measured with the benchmarks reflecting relevant market conditions and representing reasonable and achievable natural gas costs in Minnesota for the term of the plan; and
- A mechanism through which the utility shares with its customers the difference between actual natural gas costs and the plan's benchmark costs during the term of the plan.

Minnegasco, now CenterPoint Energy, was the only Minnesota natural gas utility to have an approved performance-based plan under Minn. Stat. § 216B.167.

Minnegasco's performance-based plan was approved by the Commission in Docket No. G008/M-95-465 and was in effect for three years from 1996 to 1998.

Minnegasco's performance-based gas purchasing plan contained a two-part benchmark. The first part of the benchmark was called the "LDC Benchmark," which was set based on the weighted average cost of gas (commodity and demand) for the three largest natural gas utilities in Minnesota other than Minnegasco. The second part of the benchmark was called the "Market-Based Benchmark," which consisted of two components – the commodity cost component, based on a commodity reference point to the bid week price at NNG-Ventura, and the demand

⁶ See *In the Matter of an Investigation into Whether the Purchased Gas Adjustment (PGA) is Still Appropriate*, Docket No. G999/CI-95-696, Comments of the Minnesota Department of Public Service at 3 (Sept. 25, 1995).

cost component, which was based on the amount of pipeline capacity Minnegasco had under contract as of its most recent prior rate case proceeding.

The sharing mechanism under Minnegasco's plan included a dead-band (within which no sharing takes place), a 50/50 sharing of all savings and costs outside the dead-band, and an overall cap on sharing of savings and costs equal to two percent of Minnegasco's total annual gas costs. The plan applied to all sales customers, but excluded transport customers, who do not purchase their natural gas supplies (or interstate pipeline transportation) from the utility.

Over the three years Minnegasco's performance-based gas purchasing plan was in effect, the plan resulted in total net incentives of \$27.9 million. The amount of the incentive retained by customers was \$17.4 million and Minnegasco retained \$10.5 million.

As part of the evaluation of Minnegasco's performance-based plan, the Company and the Department concluded the plan was successful in meeting the goal of the performance-based gas procurement plans and produced net benefits for customers by linking financial rewards and penalties to the utility's performance. However, the Department, OAG, and Commission also acknowledged "the practical difficulty of devising a totally accurate evaluation mechanism" noting that as of the end of the three-year plan term, "no party ... has identified a better way to measure achievement of the statutory objectives."⁷ The Company and the Department recommended the Commission and legislature support the continuation of legislation in Minn. Stat. § 216B.167, and the Legislature repealed its sunset in 1999.

On October 29, 1999, Peoples Natural Gas Company ("Peoples") filed a Petition for adoption of a performance-based gas purchasing plan, proposing similar benchmarks to those approved under Minnegasco's plan. On January 3, 2000, the Department filed comments recommending that the Commission deny Peoples' petition. The Department concluded "[i]n order to provide benefits to Peoples' ratepayers, the PBR Plan must alter Peoples' behavior. In other words, the plan must make Peoples develop a gas purchasing strategy that they otherwise would not pursue, absent the plan. This plan, ideally, would offer Peoples' customers a lower cost of gas, and

⁷ *In the Matter of Minnegasco's Petition for a Performance-Based Gas Purchasing Plan*, Docket No. G008/M-95-465, Order Evaluating Minnegasco's Performance-Based Gas Purchasing Plan and Requiring Filing at 3 (May 5, 1999).

would provide Peoples with the necessary incentives to improve their gas purchasing decisions. 'The PBR Plan, as currently filed, does not accomplish this goal.'"⁸

Following the Department's comments, Peoples and the Department engaged in extensive discussions in an effort to reach agreement on a mutually acceptable performance-based purchasing plan. Ultimately, Peoples withdrew its Petition on March 23, 2000, noting that the requirements necessary to gain the Department's support were not economically feasible for Peoples, and the Commission accepted the withdrawal by Order dated May 10, 2000.⁹

Additionally, prior to enactment of Minn. Stat. § 216B.167 on March 27, 1995, Peoples filed a Petition in Docket No. G011/M-95-182 requesting approval of a capacity release sharing plan under which Peoples would retain 30 percent of revenues from capacity release transactions and return 70 percent of revenues to customers through the PGA true-up. The Department and OAG recommended denial of Peoples' proposed plan, but noted Peoples was free to file a performance-based incentive plan in accordance with the provisions of the then newly enacted Minn. Stat. § 216B.167. The Commission issued an Order Denying Request for Capacity Release Sharing Plan on August 3, 1995, finding the public interest would be harmed by approval of the plan because it would result in piecemeal regulation providing a reward for activity that was already amply motivated.¹⁰

With respect to setting benchmarks for natural gas commodity costs, one significant challenge with gas purchasing incentive mechanisms is the fact that the majority of natural gas commodity purchases are either through a) short- to medium-term contracts predominantly tied to some external market index, or b) from spot gas purchases where the price is set in the daily market. In both situations, the prices are established in the competitive gas supply marketplace. Additionally, there are a number of complex factors which affect the market price of gas supplies, and such factors are largely outside the control of the Gas Utilities. As a result of these circumstances, some jurisdictions which had implemented pilot gas cost incentive

⁸ *In the Matter of Minnegasco's Petition for a Performance-Based Gas Purchasing Plan*, Docket No. G008/M-95-465, COMMENTS OF THE ENERGY DIVISION OF THE MINNESOTA DEPARTMENT OF COMMERCE at 15 (Jan. 3, 2000).

⁹ *In the Matter of Peoples Natural Gas Company's Petition to Adopt Performance Based Gas Purchasing Plan*, Docket No. G011/M-99-1549, ORDER PERMITTING WITHDRAWAL OF PETITION (May 10, 2000).

¹⁰ *In the Matter of a Request for a Capacity Release Revenue Sharing Plan by Peoples Natural Gas Company, a Division of UtiliCorp United, Inc. in the State of Minnesota*, Docket No. G011/M-95-182, ORDER DENYING REQUEST FOR CAPACITY RELEASE SHARING PLAN at 7 (Aug. 3, 1995).

mechanisms ultimately returned to pass-through recovery mechanisms, finding that the incentive structure did not achieve lower gas prices as compared to a pass-through recovery mechanism, and that pass-through mechanisms provided greater flexibility for utilities to react to market conditions and opportunities to meet customer needs.

CONCLUSION

The Gas Utilities appreciate the opportunity to provide this information to the Commission.

Dated: September 15, 2022

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of Severe Weather in February 2021 on Impacted
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Docket No. G002/CI-21-610

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

Docket No. G011/CI-21-611

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 15th day of September, 2022, on behalf of CenterPoint Energy Resources Corporation d/b/a CenterPoint Energy Minnesota Gas, Northern States Power Company, a Minnesota Corporation (Xcel Energy), Minnesota Energy Resources Corporation, and Great Plains Natural Gas Company, I electronically filed a true and correct copy of the enclosed Initial Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service lists.

Dated this 15th day of September, 2022.

/s/ Kristin M. Stastny

Kristin M. Stastny

[illegible]

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Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-611_Official Service List
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-611_Official Service List
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Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-611_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-611_Official Service List
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-611_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-611_Official Service List
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Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	Yes	OFF_SL_21-235_Official
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-235_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-235_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-235_Official
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-235_Official
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-235_Official
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_21-235_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_21-235_Official
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-235_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-235_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-235_Official
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-610_Official Service List
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Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official 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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David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-610_Official Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official Service List
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Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-610_Official Service List
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_21-610_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-610_Official Service List
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Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-610_Official Service List
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Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings	600 N. Robert St. St. Paul, Mn. 55101	Electronic Service	No	OFF_SL_21-138_Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-138_Official Service List
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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_21-138_Official Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-138_Official Service List
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-138_Official Service List
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-138_Official Service List
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_21-138_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-138_Official Service List

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Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-138_Official Service List
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Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-138_Official Service List
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
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