



505 Nicollet Mall  
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Minneapolis, MN 55459-0038

April 18, 2019

Mr. Daniel Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

**VIA E-FILING**

**RE: Petition by CenterPoint Energy to Introduce a Renewable Natural Gas Pilot Program**  
**Docket No. G-008/M-18-547**

Dear Mr. Wolf:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, ("CenterPoint Energy" or the "Company") respectfully submits the following *Reply Comments* in the matter of its Petition to introduce a Renewable Natural Gas ("RNG") Sales Pilot program.

Please contact Nick Mark at (612) 321-4613 (Nick.Mark@CenterPointEnergy.com) or Amber Lee at (612) 321-4625 (Amber.Lee@CenterPointEnergy.com) with any questions regarding this filing.

Sincerely,

/s/ Amber S. Lee

Director Regulatory Affairs

C: Service List

**STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

Katie Sieben  
Dan Lipschultz  
Matt Schuerger  
John Tuma

Chair  
Commissioner  
Commissioner  
Commissioner

In the Matter of a Petition by  
CenterPoint Energy to Introduce a  
Renewable Natural Gas Sales Pilot Program

Docket No. G-008/M-18-547

**REPLY COMMENTS**

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (“CenterPoint Energy” or the “Company”) respectfully submits these second *Reply Comments* in response to *Comments* filed by the Office of Attorney General – Residential Utilities and Antitrust Division (“OAG”),<sup>1</sup> and the Department of Commerce, Division of Energy Resources (“Department”).<sup>2</sup> In addition, the Company appreciates the time and attention of the Mississippi Watershed Management Organization, which submitted supportive *Comments* on April 5, 2019.

In their *Comments*, the OAG and Department agree that the Company’s modified Pilot proposal satisfactorily addresses many of the concerns expressed in initial comments.<sup>3</sup> The OAG and Department, however, still have concerns regarding the price of renewable natural gas (“RNG”), and the Department also remains concerned regarding the RNG verification and tracking process and makes several suggestions for Pilot improvements. Below, the Company responds to the issues raised by the OAG and Department.

**I. Existing RNG Market -- Credits and Attributes**

The Department states that it remains concerned that it is not “reasonable for the Company’s ratepayers to pay significantly more for the environmental attributes of RNG, particularly when [the Company’s] proposed end uses of the RNG Pilot would not qualify for these environmental attributes or credits.”<sup>4</sup> The Department’s concern appears to be based on a misunderstanding

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<sup>1</sup> *In the Matter of a Petition by CenterPoint Energy to Introduce a Renewable Natural Gas Pilot Program*, Docket No. G-008/M-18-547, Letter (Apr. 8, 2019) (“OAG Comments”).

<sup>2</sup> *In the Matter of a Petition by CenterPoint Energy to Introduce a Renewable Natural Gas Pilot Program*, Docket No. G-008/M-18-547, response Comments of the Minnesota Department of Commerce Division of Energy Resources (Apr. 8, 2019) (“Department Comments”).

<sup>3</sup> OAG Comments at 2, Department Comments at 25-26.

<sup>4</sup> Department Comments at 13.

of the environmental “attributes” and “credits” associated with RNG. The environmental “attributes” of RNG are the qualities of the natural gas molecule that make it “renewable.” The environmental “credits” are the monetized attributes of the natural gas molecule, that are sold for value within the natural gas market.

There are two types of credits available in the RNG market today:

1. Federal Credits: RNG is eligible for federal Renewable Fuel Standard (“RFS”) renewable identification numbers (“RINs”). Transportation fuel refiners must comply with the RFS by blending renewable fuels into transportation fuel or obtaining RINs. RINs are generated for RNG when an approved RIN-generator demonstrates that RNG was used to fuel a natural gas vehicle.
2. State of California Credits: RNG is eligible for California Low Carbon Fuel Standard (“LCFS”) credits. The LCFS requires petroleum importers, refiners, and wholesalers operating in California to reduce the carbon intensity of California transportation fuel. LCFS credits are generated when a party demonstrates that RNG (or another low-carbon fuel) was used as vehicle fuel in California.

It is true that the end uses of the Pilot customers would likely not qualify for the monetized environmental credits that can be generated from the renewable attributes of the RNG. But it is also true that in order to purchase RNG supply for the Pilot, the Company will have to participate in the market. The market price of RNG will in all reality be based on the highest market price available to the RNG producer, which will include the price of the monetized credit. The Company assumes that when it issues a request for proposal (“RFP”) for its first purchase of RNG, the bid prices will be similar or equivalent to the price at which the RNG could be sold to generate credits. It is logical to assume that an RNG producer will have a certified pathway to the RNG credit markets, and that the producer would not voluntarily choose to sell the RNG to the Company at a price lower than the price that could be obtained in the credit markets. In other words, it is reasonable for participants to pay more for RNG because the market price will include the price that the producer could have received if it would have sold credits in the marketplace – the Company will need to pay an amount for RNG sufficient to compensate the producer to forego creation of environmental credits under other programs.

The LCFS and RFS have increased the market price of RNG. In order to purchase natural gas with renewable *attributes*, parties must pay a higher price whether or not they desire to use those *attributes* to generate *credits*. It is necessary for customers who wish to purchase RNG to pay a higher price for the environmental *attributes* of RNG, relative to the price of conventional natural gas, even though CenterPoint Energy does not believe that RNG sold through the Pilot is likely to qualify for *credits*. If the Commission approves the proposed Pilot, CenterPoint Energy will initiate an RFP process for RNG similar to processes it currently uses to procure conventional natural gas. The RFP process will ensure that participating customers pay a reasonable market-based price for RNG, as similar processes ensure that customers pay reasonable prices for conventional natural gas.

## II. Tracking and Verification

The Company intends the above discussion to provide clarity around the Department's comments on tracking and RNG verification systems as well as the cost of RNG in relation to *credit* system compliance costs. The Company believes that it will be able to verify that the RNG it would purchase for the Pilot would (1) come from a renewable source; and (2) be sold only to the Company. The Company believes that it will be able to adequately complete both these essential tasks on its own, and indeed, neither the Department nor the OAG raised any concerns about the particular verification method the Company proposed to implement.<sup>5</sup>

The Department has questioned "whether tracking in isolation of the RNG market as a whole or on a regional basis...would be adequate to ensure that the Pilot results in an expansion of the RNG market." Although the Company proposes to track only the RNG it purchases, by ensuring that its RNG and the environmental *attributes* of its RNG are not sold to other buyers, the Pilot will ensure that RNG sold is incremental to RNG sold in relation to the RFS and LCFS credit markets and any other national markets.

External third-party verification and tracking would be useful tools for ensuring consumer confidence in the RNG Pilot and allowing for a more robust market for trading and selling of the renewable *attributes* for uses other than LCFS and/or RFS compliance. The Company believes it is likely that Center for Resource Solutions and the Midwest Renewable Energy Tracking System will launch RNG verification and tracking systems, respectively, before the Pilot is launched. However, external tracking and verification are not essential for this Pilot. Voluntary renewable markets for electricity launched in Minnesota and operated for several years without external tracking and verification.<sup>6</sup> Indeed, CenterPoint Energy and external third-party

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<sup>5</sup> *In the Matter of a Petition by CenterPoint Energy to Introduce a Renewable Natural Gas Pilot Program*, Docket No. G-008/M-18-547, Reply Comments, p. 9-10 (Mar. 1, 2019) ("*CenterPoint Energy First Reply Comments*"). The Company's proposed verification is similar to the verification system approved by the Vermont Public Utilities Commission for Vermont Gas System's voluntary RNG green-tariff. The Company's verification will include: (1) Confirmation of renewable fuel feedstock; (2) Confirmation of the renewable fuel production process; (3) Review of fuel flow measurement and quality monitoring process and equipment; (4) Review of contracts and affidavits governing the transfer of the RNG from the original source to the end user; and (5) Review of evidence confirming the existence of a physical path (common carrier pipeline) from RNG transfer and distribution to end user.

<sup>6</sup> The first voluntary electric green tariff programs launched in Minnesota by 2003. *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of a Renewable Energy Rider*, Docket No. E-002/M-01-1479, Annual Compliance Filing, p. 2 (May 3, 2004). M-RETS was not approved by the Commission until October 9, 2007 in connection with Minnesota's first mandatory renewable electricity portfolio standard. *In the Matter of a Commission Investigation into a Multi-State Tracking and Trading System for Renewable Energy Credits*, Docket Nos. E-999/CI-04-1616, E-999/CI-03-869, Order Establishing Initial Protocols for Trading Renewable Energy Credits, p. 2 (Dec. 18, 2017). Accordingly, electric green-tariff programs operated in Minnesota for four years without external third-party tracking. Xcel Energy, which began operating green tariff programs in Minnesota in 2003, did not file for external third-party verification from Green-e until 2006. *In the Matter of the Petition of Northern States Power Company, A Minnesota Corporation for Approval of a Voluntary Renewable Energy Rider*, Docket No. E-002/M-01/1479, Compliance Report and Semi-Annual Tracker Account Report, (Nov. 2, 2006). Accordingly, Xcel Energy operated its green tariff program without external third-party verification or tracking the first three years.

verification and tracking organizations may be better able to develop systems for this new type of voluntary market after the Pilot has provided some initial lessons.

### **III. The Price of RNG**

The OAG raised a slightly different concern about the price of RNG relative to conventional natural gas. The OAG argued that because RNG is quite expensive relative to the price of conventional natural gas, the Commission's statutory requirement to set just and reasonable rates prevents it from allowing CenterPoint Energy to offer the Pilot. Because the modified program design will not result in any additional costs for non-participating customers, the OAG's argument is that it would be unjust or unreasonable for the Commission to allow customers to choose to participate in the Pilot. The OAG is making a value judgment that RNG is not worth the additional price, and urges the Commission to prevent customers from acting on a different view of the matter. Because any doubt about the reasonableness of a rate should be resolved in favor of the consumer,<sup>7</sup> the Company believes it would be more consistent with the Commission's statutory obligation to approve the proposed Pilot and allow customers the ability to make environmental choices on their own behalf.

### **IV. Proposed Workshop**

The Department recommended that the Commission require CenterPoint Energy to host a workshop to explore the use of RNG for non-transportation uses before it approves the proposed Pilot. The Company welcomes the opportunity to engage with interested parties, including other governmental agencies, about the use of RNG in Minnesota for non-transportation purposes. The Company disagrees, however, that approval of the Pilot should be delayed until after the workshop is held. At some point, in order to understand how and whether RNG can play a role in Minnesota, it is necessary to start using RNG. There is a need for experimentation, which is why CenterPoint Energy has proposed this offering as a Pilot, rather than a permanent offering, proposed frequent reporting and evaluation, and built in an annual process to allow for modifications to the Pilot design.

The Department provides four reasons why the Pilot would be premature before the workshop. The first three have to do with the lack of an applicable credit system or governmental policy supporting RNG and the price of RNG in absence of such a system or policy. The Company hopes that its discussion above clarifies why a government established credit system is not necessary for the proposed Pilot. Indeed, voluntary green electricity tariffs predated renewable electricity credit systems in Minnesota by several years.<sup>8</sup> However, the Company would welcome discussion about how government policy could assist the development of the RNG market in Minnesota. The final reason why the Department believes the Pilot is premature is that "CenterPoint has not adequately addressed the relationship with its affiliate, once it is certified by the EPA." More information on our affiliate is provided below, but the Company

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<sup>7</sup> Minn. Stat. § 216B.03.

<sup>8</sup> See *supra* note 9.

does not believe this information is pertinent to the proposed Pilot, and in any event, CenterPoint Energy will follow and comply with all applicable affiliated interest rules.

Accordingly, the Company has no objection to hosting a workshop on proposed non-transportation uses of RNG, but disagrees that a workshop is necessary before Pilot approval. As the Company launches this Pilot, it and stakeholders will certainly grow in their understanding of the topic, which is why the Company has specified that it may file modifications to the Pilot design in its annual evaluation reports. Additionally, many stakeholders are already participating in the RNG arena, and much of the stakeholder work is collaboratively underway. For example, on April 17, 2019, the Great Plains Institute facilitated a workshop titled “The Future of Anaerobic Digestion in Minnesota,” which was attended by representatives of the Company, the Minnesota Pollution Control Agency, the Minnesota Department of Commerce, the Minnesota Department of Agriculture, and others. Transportation and non-transportation uses of RNG were discussed.<sup>9</sup> Approval of the Pilot program will allow Minnesota to continue to grow the RNG momentum that is underway.

## **V. Miscellaneous Issues**

### *Additional PGA and Annual Pilot Evaluation Reporting*

The Department recommended that in its annual Purchase Gas Adjustment (“PGA”) filings, the Company provide a schedule of the RNG supply included in the general gas portfolio. In the Company’s annual Pilot Evaluations, the Department recommended that the Commission require the Company to include particular information in its proposed program tracker and provide the previous year’s tracker in its annual filings.

The Company has no objection to including the additional information recommended by the Department in its annual PGA filings and Pilot Evaluations.

### *Recovery of Administrative & Marketing Costs through the Pilot Charge*

The Department recommended that the Company’s recovery for administrative and marketing costs associated with the Pilot through the Pilot Charge be limited to the recovery of external costs, at least until the Company “resets its other tariffed base rates in a general rate case proceeding, where internal resource costs can be transparently apportioned among the various programs and their rates.”<sup>10</sup>

The Company has no objection to limiting its Pilot Charge recovery for administrative and marketing costs to external costs until apportionment of internal resource costs is vetted in a rate case proceeding.

### *Potential Operational Savings Opportunities for CNG Fueling Station*

The Department suggested that further discussion of possible operational savings opportunities related to CenterPoint Energy’s compressed natural gas (“CNG”) fueling station and RINs may

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<sup>9</sup> The workshop agenda is attached as Exhibit 1.

<sup>10</sup> *Department Comments* at 7.

be appropriate within CenterPoint Energy's forthcoming general rate case or any applicable future filings related to CenterPoint Energy affiliates.

CenterPoint Energy affiliates' interest in RNG is discussed below. The Company does not believe at this time that there are any savings opportunities relating to the CNG fueling station and RNG, but it has no objection to discussing possible operational savings opportunities in its next rate case.

#### *Affiliate Interests*

The Department made several recommendations related to the Company's unregulated affiliate CenterPoint Energy Services, Inc. ("CES"). "[T]he Department recommends that [CenterPoint Energy], in its forthcoming rate case filing and in any future filings involving RNG, to keep the Commission abreast of any further developments of [CenterPoint Energy's] affiliate's pursuit as a RIN generator and how the affiliate, as an approved RIN generator, may benefit from [CenterPoint Energy's] proposal, what costs should be allocated to its affiliate, and whether its affiliate would be expected to serve [CenterPoint Energy] in future should the utility consider use of RNG in its fleet vehicles. The Department recommends that the Commission direct [CenterPoint Energy] to include this additional information in its forthcoming rate case filing and in any future filings involving RNG transactions or services."<sup>11</sup>

The Company would first like to clarify that RIN generators are certified by the EPA on a path-by-path basis.<sup>12</sup> In other words, a RIN-generator could be certified to generate RINs for the use of RNG from a particular landfill at a particular fueling station, for example, but would not be able to generate RINs for any other RNG source or fueling station without further EPA certification. Therefore, CES will not be able to generate RINs related to the Company's fueling station or in relation to the Pilot program without specifically applying for that EPA authorization.

If the Company were to work with CES to generate RINs in relation to the Pilot or its CNG fueling station, it would comply with the applicable Commission rules on affiliate transactions. Minnesota Rules §§ 7825.1900 – 7825.2300. CenterPoint Energy has no plans at this time to work with any RIN-generator to create RINs in relation to the Pilot or its CNG fueling station, and the Company does not have access to the plans of its unregulated affiliate that have no relationship to any regulated utility action.

#### *Impact to Pilot if Supply Shortage Triggers Additional RNG Procurement*

The Department requested that the Company explain how it would remedy RNG supply pricing changes that diverge from the proposed year-long tariff rate.

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<sup>11</sup> *Department Comments* at 10.

<sup>12</sup> See Element Markets, *Following Biogas from Source to Credit Generation*, p. 5 (Apr. 2016) available at [https://www.epa.gov/sites/production/files/2016-05/documents/2016\\_04\\_followingbiogasfromsourcetocreditgeneration\\_randallock\\_508.pdf](https://www.epa.gov/sites/production/files/2016-05/documents/2016_04_followingbiogasfromsourcetocreditgeneration_randallock_508.pdf) (last visited Apr. 16, 2019) (showing that part of a RIN generator's application package includes the physical pathway or pathways).

The Company intends to annually reset the Pilot Charge, as necessary, such that 90 percent of the Pilot Charge is equal to the Company's forecasted per Dth weighted average cost of RNG. CenterPoint Energy expects to enter into annual contracts for RNG and that it will likely need to purchase more RNG than is needed for Pilot participants. Accordingly, the Company does not anticipate frequent mid-year changes to the weighted-average cost of the RNG purchased for the Pilot program. However, the Company understands the Department's concern, and proposes that it will file mid-year tariff revisions in the event that there is a change in RNG supply causing a significant change in the weighted average cost of RNG. Specifically, the Company proposes that if the Company's supply costs change so that they are 25 percent more or less than 90 percent of the Pilot Charge, the Company will file a mid-year revision to its RNG program tariff to be effective immediately. Less significant changes to the weighted average cost of RNG will be handled through the annual process.

The Company notes that it has proposed that customers will select their RNG purchase as a dollar commitment. Accordingly, changes in the tariffed Pilot Charge will affect the quantity of RNG that CenterPoint Energy buys for participants, but, in most cases, will not affect the amount customers pay into the program.<sup>13</sup>

#### *Proposed Marketing and Webpage Materials*

The Department reviewed the proposed marketing and webpage materials filed by the Company in this docket on March 25, 2019 and noted what it perceived to be an inconsistency between information provided in the marketing materials and information provided in CenterPoint Energy's earlier *Reply Comments*.

In its March 1, 2019 *Reply Comments* the Company stated that it might market the Pilot by providing options for customers framed in terms of RNG cost in relation to specific household uses. One of the options suggested was "\$58/month – RNG to heat my water." In the draft marketing materials filed by the Company on March 25, 2019, one of the options presented was "\$19.00/mo. – Enough to warm my showers." The two statements about RNG price are not inconsistent. The Company estimates the price of all home water heating with RNG to be \$58/month, based on a \$38.89/Dth Pilot Charge and average residential usage data from the U.S. Energy Information Administration.<sup>14</sup> The Company estimates the price of water heating for only shower usage to be approximately \$19/month, using the \$38.89 Pilot Charge and the State of Minnesota Conservation Improvement Program Technical Reference Manual published by the Department of Commerce.<sup>15</sup>

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<sup>13</sup> The only case in which changes to the tariffed price would change the amount that a participant pays is when the customer has selected a high dollar commitment so that their program contribution is limited by their total natural gas use.

<sup>14</sup> See *CenterPoint Energy First Reply Comments* at 10, note 33.

<sup>15</sup> *State of Minnesota Technical Reference Manual for Energy Conservation Improvement Programs*, Version 3.0, p.154 (Jan. 10, 2019), available at <http://mn.gov/commerce-stat/pdfs/mn-trm-v3.0.pdf> (last visited Apr. 16, 2019). The Company calculated the use of a non-low-flow showerhead by calculating the "Unit Dth Savings per Year" assuming the replacement low-flow showerhead had a flow of 0 gallons per minute. The Company used the Twin Cities/Southern Minnesota average groundwater temperature from Table 1 and the Single-Family values from Tables 2 and 3.



Regardless, the marketing materials filed by the Company on March 25, 2019, were meant only to illustrate the Company's planned marketing approach. Final marketing materials will reflect the actual Pilot Charge to be determined through the RFP process and may not show the same household uses (e.g. showers may be replaced by a home dishwasher).

#### *Proposed Tariffs*

The Department reviewed CenterPoint Energy's proposed tariffs and proposed two small additions. The Company has no objection to the changes offered by the Department.

#### *New Policies, Legislation, and the Company's Pilot Program*

The Department stated that, in the event of future legislation allowing CenterPoint Energy to recover Pilot costs from non-participants, such recovery would be only prospective, given the Company's commitment to undertake and bear any costs that are not recovered from participating ratepayers. The Company agrees to work with the Department to determine how new policies or legislation would affect the proposed Pilot.

### **VI. Conclusion**

The Company appreciates the Comments from the OAG and DOC. CenterPoint Energy respectfully requests that the Commission approve the proposed Pilot with the modifications discussed.

## The Future of Anerobic Digestion in Minnesota

MCIT (100 Empire Dr, Ste 100 | St. Paul, MN 55103)

April 17, 2019

8:30 am to 1:00 pm

### Agenda

- 8:30 am** Registration and breakfast available
- 9:00 am** Welcome and Project Background from the Partnership
- 9:15 am** Introductions and Meeting Overview
- 9:30 am** Phase 1 Review
- 10:00 am** Panel Discussion on Policy Considerations, National Context, and Environmental Impact of Anaerobic Digestion  
*Moderator: Brendan Jordan*
  - Patrick Serfass, American Biogas Council
  - Sam Wade, Coalition for RNG
  - Rosie Hoyem, Midwest Renewable Energy Tracking System
  - Bob Powell, Brightmark Energy
  - Kelsey Dillon, Avant Energy
- 11:45 am** Facilitated Group Discussion on the Future of Anaerobic Digestion in Minnesota
  - What do we want to achieve?
  - What needs to happen?
  - What do we hope to avoid?
  - What do we need to know that we don't know right now?
  - What barriers exist, and what are possible solutions?
  - Who else needs to be a part of these discussions, and why?
- 12:30 pm** Lunch & Closing Thoughts
- 1:00 pm** Adjourn

### Getting there

- **Transit:**
  - By bus: Plan your route using [Metro Transit's website](#)
  - By train: MCIT is located 0.6 mi from the Capitol/Rice St Station on the Green Line.
- **Parking:** Parking is available in the lot adjacent to MCIT.

### Additional Logistics

- There will be a warm, morning breakfast as well as a catered lunch.
- Upon arrival, there will be a sign in the lobby directing you to the room.



This meeting is facilitated by the Great Plains Institute, a nonpartisan, national, nonprofit organization transforming the energy system to benefit the economy and environment. Learn more at [www.betterenergy.org](http://www.betterenergy.org).

**AFFIDAVIT OF SERVICE**

STATE OF MINNESOTA     )  
  )  
COUNTY OF HENNEPIN     )

Erica R. Larson, being first duly sworn on oath, deposes and says that she is an employee in the office of CenterPoint Energy, Minneapolis, Minnesota 55402, and that on the 18th day of March 2019, she delivered the enclosed notice of filing to those individuals and agencies listed on the attached pages, by:

  x   placing such notice in envelopes, properly addressed with postage paid, and depositing the same in the United States Mail at Minneapolis, Minnesota, for delivery by the United States Post Office,

     personal service,

     express mail,

     delivery service,

  x   electronic filing.

\_\_\_\_\_/s/ Erica R. Larson  
Erica R. Larson

Subscribed and sworn to before me  
This 18<sup>th</sup> day of March 2019.

\_\_\_\_\_/s/ Melodee Sue Carlson Chang  
Melodee Sue Carlson Chang  
Notary Public (Commission Expires January 31, 2024)

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DGC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-547_M-18-547
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