

April 2, 2021

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. G008/M-21-138 and G999/CI-21-135

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

The Petition of CenterPoint Energy Minnesota Gas (CenterPoint or the Company) for Approval of a Recovery Process for Costs Impacts Due to Extreme Gas Market Conditions (Petition).

The Petition was filed on March 16, 2021 by:

Amber Lee
Director, Regulatory Affairs
CenterPoint Energy
505 Nicollet Mall, PO Box 59038
Minneapolis, MN 55459-0038

The Department recommends that the Minnesota Public Utilities Commission (Commission) withhold decision on this Petition until CenterPoint provides additional information supporting the extraordinary need for accelerated recovery or the conclusion of its investigation in Docket No. G999/CI-21-135. The Department also responds to the Commission's March 22, 2021 Notice of Shortened Comment Period on Procedural Issues in these comments.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ ADAM J. HEINEN
Rates Analyst

AJH/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. G008/M-21-138 and G999/CI-21-135

I. INTRODUCTION AND BACKGROUND

Beginning on February 5, 2021, the Upper Midwest and Minnesota experienced a period of extended cold weather. The cold weather conditions in Minnesota did not reach planning objectives¹ and customers did not experience disruptions to their natural gas service. However, beginning on Friday, February 12, 2021, prices in the regional natural gas spot market rose to unprecedented levels as demand increased in response to anticipated cold weather in Texas and the Southern United States over the President's Day holiday weekend. These price increases were exacerbated by the fact that gas users, including CenterPoint Energy, Minnesota Gas (CenterPoint or Company) and other Minnesota local distribution companies (LDCs), were required to purchase gas for the entirety of the three-day President's Day weekend because the natural gas markets were closed. According to CenterPoint, the elevated natural gas prices persisted over the period from approximately February 12, 2021 to February 22, 2021 (Pricing Event).² This combination of factors resulted in a significant, and unprecedented, under-recovery of natural gas costs for Minnesota LDCs.

On February 19, 2021, CenterPoint filed a letter with the Minnesota Public Utilities Commission (Commission) in Docket No. G008/M-21-138 noting the severity of its gas cost under-recovery, and indicating a concern that the existing Annual Automatic Adjustment (AAA) framework may be inadequate to address an under-recovery of this magnitude. CenterPoint also explained the necessity for an efficient regulatory response and that it anticipated making a formal cost recovery proposal in the near future.

On February 23, 2021, the Commission held a Planning Meeting regarding the Pricing Event. At the Planning Meeting, representatives from the Minnesota Department of Commerce, Division of Energy Resources (Department), the Office of the Attorney General, Residential Utilities Division (OAG), and each of the regulated Minnesota natural gas utilities provided information regarding the Pricing Event and its impact on utility operations. At the conclusion of the Planning Meeting, the Commission authorized an investigation into the Pricing Event in Docket No. G999/CI-21-135. On March 2, 2021,

¹ Referred to as "design day." The Minnesota Public Utilities Commission has historically used the coldest average temperature over a 24-hour period, which is -25F at Minneapolis-St. Paul, as the planning objective for regulated natural gas utilities.

² Petition, Page 1.

the Commission issued its Order Opening Investigation and, on March 10, 2021, the Commission issued a Notice of Comment Period in Docket No. G999/CI-21-135 requesting information from Minnesota natural gas utilities and state agencies. The Commission requested initial comments from the LDCs on April 9, 2021 and filings responding to LDC comments on May 10, 2021.³

On March 16, 2021, CenterPoint filed a Petition for Recovery of Cost Due to Extreme Gas Market Conditions (Petition) in Docket No. G008/M-21-138. CenterPoint explained that February market conditions were extraordinary, as are the resulting costs.⁴ CenterPoint stated that, at the time of its filing, natural gas prices had stabilized but its preliminary estimates are that the Company incurred approximately \$500 million in gas costs between February 12, 2021 and February 22, 2021. The Company explained that, given the magnitude of these costs and the fact that it was beginning to receive invoices from gas suppliers due in March 2021, existing gas cost recovery mechanisms are likely not adequate to mitigate customer impacts and ensure the continued financial health of the utility. The Company argued that utilizing the existing AAA true-up mechanism to recover these costs would result in dramatic rate increases at a time when many customers are already struggling economically due to the COVID-19 pandemic.⁵

Given these concerns, CenterPoint requested that the Commission approve alternative cost recovery for the costs associated with the Pricing Event through a separate tracker and tariffed rates. The Company proposed that the Commission allow CenterPoint to begin recovery of the estimated \$500 million under-recovery in May 2021 or as soon as possible. CenterPoint stated that it would track the final actual costs as supplier invoices are paid and that costs will be separate from the Company's normal AAA true-up adjustment, which would continue normally, excluding Pricing Event related costs. Specifically, the Company proposed to:

- Establish a regulatory asset account to track the gas costs paid to suppliers, the costs to finance the gas costs incurred, payments collected from customers, and any offsets to the recoverable costs;
- Begin recovery of the estimated \$500 million in gas costs, and associated financing costs, in May 2021, or as soon as practical after Commission approval, and spread the recovery of these costs over two years, with an adjustment beginning in year two based on the tracker balance at that time;

³ On April 1, 2021, the Commission issued a Request for Supplemental Initial Filings and Notice of Comment Period in Docket No. G999/CI-21-135. Specifically, the Commission requested that the utilities provide discussion about how they confirm that their firm contracts for natural gas transportation and supply are actually firm including commitment from the pipeline companies that they have contract for firm electricity supply to their compressor stations. These supplemental initial filings are due on April 16, 2021 with comments on these filings due on May 10, 2021.

⁴ Petition, Page 1.

⁵ Petition, Page 2.

- Recover commodity costs from all sales customers through a fixed surcharge that is phased-in over two years with variable summer and winter rates to help moderate the monthly bill impact of these costs;
- Recover a portion of the financing costs associated with the February Market Event⁶ from transportation customers;
- Implement a separate low-income rate to protect the most financially vulnerable customers from the impacts of these costs in consideration of those customers' ability to pay; and
- Establish a regulatory asset to track and defer the bad debt expense associated with the February Market Event for recovery in a future proceeding.⁷

CenterPoint further explained that the impacts of the Pricing Event have been felt across the country and are not isolated strictly to the Company. CenterPoint also noted that, as the nation's second largest gas distribution utility, the Company has been significantly impacted and the Pricing Event could have a material, adverse impact on CenterPoint Energy Resources Corporation's (CenterPoint Minnesota's corporate parent) financial condition.⁸ The Company also provided analysis and discussion regarding its gas supply purchasing for the 2020-2021 heating season and Pricing Event and further discussion and specifics regarding its cost recovery proposal. As part of this discussion, CenterPoint included information regarding its proposal to include finance charges in the recovery proposal and how the Company arrived at the conclusion that interest expenses are appropriate.⁹

On March 22, 2021, the Commission issued a Notice of Shortened Comment Period on Procedural Issues (Notice). In this Notice, the Commission noted that the issue is procedurally, how should the Commission handle CenterPoint's Petition, and the Commission also noted that several areas were open for comment. Specifically, these areas are:

- Should the Commission request comments on the merits of CenterPoint's request and, if so, what issues should parties address in their comments and how much time should parties have to investigate the merits of CenterPoint's request;
- Alternatively, should this matter be consolidated into the Commission's investigation regarding the impact of the February 2021 severe weather; and
- Should this matter be referred to the Office of the Administrative Hearings for a contested case proceeding?

The Department responds to the Company's Petition and the Commission's Notice below.

⁶ CenterPoint refers to the Pricing Event as the February Market Event.

⁷ Petition, Page 2.

⁸ Petition, Page 3.

⁹ Petition, Pages 4-21.

II. DEPARTMENT RESPONSE TO CENTERPOINT PETITION

The Department's review of CenterPoint's Petition is ongoing. However, at this time, the Department has a particular concern regarding CenterPoint's proposal to begin recovering costs incurred during the Pricing Event in May 2021, or as soon as practical after Commission approval.

As noted in Section I above, gas utilities will be filing information in response to the Commission's Order Opening Investigation on April 9, 2021, comments on that information are due on May 10th, and reply comments are due on May 20th. A final Order likely will not be issued until at least July 2021, if not later. CenterPoint is therefore requesting to begin recovering gas costs incurred during the Pricing Event prior to a final determination on the prudence of those costs. The Department has significant concerns about this proposed timing. Allowing cost recovery to begin prior to a final prudence determination could introduce potential risks, complexities, and inefficiencies to the regulatory process. For example, it may be administratively simpler to implement a uniform cost recovery scheme across all utilities, and approving CenterPoint's proposal prior to the other utilities' proposals may make a uniform approach difficult or impossible.

Further, aspects of the cost recovery scheme will likely be a function of the Commission's determinations in the investigation. For example, the length of time over which to spread recovery of gas costs incurred during the Pricing Event will be, at least in part, a function of the amount of recovery ultimately allowed. If the Commission disallows a portion of the costs, a recovery period shorter than two years may be appropriate. Furthermore, if the Commission disallows recovery of a portion of the costs of the Pricing Event, significant, mid-course adjustments to the Company's cost recovery will likely be required, causing the Company, the Department, the Commission, and other parties to spend time and effort duplicating the initial analyses of the cost recovery proposal. More importantly, allowing cost recovery prior to determining prudence could have the effect of shifting the burden of proof from the Company to other parties, as whatever assumptions regarding total cost recovery are included in the initial recovery plan will become the default option.

In its Petition, CenterPoint provided two justifications for this accelerated timing. First, the Company stated that delaying recovery until September may harm the financial health of the utility, which may ultimately harm ratepayers by negatively impacting the Company's ability to obtain future financing on favorable terms.¹ Second, CenterPoint stated that if recovery begins during the summer months, ratepayers would begin to pay the costs at a time when gas bills heating bills are typically the lowest.

With respect to the second justification, the Department notes that CenterPoint proposed to implement separate summer and winter rates, with a larger percentage of Pricing Event costs recovered during the summer, when gas bills tend to be lower, and a smaller percentage in the winter, when gas bills are typically higher. This mitigation measure addresses the Company's concern regarding waiting until September to begin cost recovery, and largely renders the CenterPoint's second justification moot.

Therefore, CenterPoint's proposal to begin cost recovery this summer seems primarily intended to protect the financial health of the Company. However, the Company's Petition does not contain enough information to determine the potential severity of the impact of the Pricing Event on its financial health. Because of this, the potential benefits of beginning cost recovery this summer are questionable at best, and at this time, the Department concludes that they do not outweigh the potential costs of beginning cost recovery prior to a final prudence determination.

The Department is still reviewing a number of other aspects of CenterPoint's proposal, including but not limited to:

- use of a fixed, rather than volumetric, surcharge, with variable summer and winter rates;
- recovery of financing charges from all customers, generally, and specifically recovery of financing charges from transportation customers that do not purchase gas from CenterPoint and therefore did not cause the Company to incur any gas costs during the Pricing Event; and
- the tracking of bad debt expense attributable to the Pricing Event for recovery in a future proceeding.

III. DEPARTMENT RESPONSE TO COMMISSION NOTICE

As noted in Section I above, on March 22, 2021, the Commission issued a Notice requesting comments on CenterPoint's Petition. Specifically, the Commission requested comments on how it should handle the Company's Petition procedurally, and included the following topics open for comment:

- Should the Commission request comments on the merits of CenterPoint's request and, if so, what issues should parties address in their comments and how much time should parties have to investigate the merits of CenterPoint's request;
- Alternatively, should this matter be consolidated into the Commission's investigation regarding the impact of the February 2021 severe weather; and
- Should this matter be referred to the Office of the Administrative Hearings for a contested case proceeding?

Based on the discussion and information in Section II, from a procedural standpoint, the Department recommends that the Commission withhold decision on this Petition until CenterPoint provides additional information supporting the extraordinary need for accelerated recovery or the conclusion of its investigation in Docket No. G999/CI-21-135.

Given the available information to date, and the pending Commission investigation, the Department does not believe that comments on the merit of the Company's request is appropriate at this time. However, if the Commission concludes that comments are needed, the Department believes that the areas of concern and analysis listed at the conclusion Section II above represent, at a minimum, areas that require additional discussion. The Department also believes that discussion on the general financial health of CenterPoint may also be of importance to the Commission if they request comment on the Company's Petition.

The Department does not believe that consolidation of this docket into the Commission's investigation in Docket No. G999/CI-21-135 is warranted. Although information and findings in the investigation may impact the Company's Petition, the degree of this impact, and facts specific to CenterPoint or other utilities, may make a consolidated proceeding unintentionally complex. However, as additional information becomes available, either in this docket or the investigation, it may be necessary to reconsider consolidating the dockets.

The impact of CenterPoint's Petition is certainly significant, and questions exist regarding the appropriateness and reasonableness of parts of the Company's proposal; however, the Department does not believe this Petition should be forwarded to the Office of Administrative Hearings (OAH) for a contested case. The timeframe for the Company's proposal, and the standard AAA process, make the feasibility of forwarding the Petition to the OAH difficult unless significant prudence issues arise in the Petition or the investigation. With additional information forthcoming in the investigation, it is possible that clarity may be reached on certain issues; however, the Department acknowledges that the need for a contested case may exist in the future.

IV. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

Based on its review, the Department recommends that the Commission withhold decision on this Petition until CenterPoint provides additional information supporting the extraordinary need for accelerated recovery or the conclusion of its investigation in Docket No. G999/CI-21-135.

In response to the Commission Notice, the Department also recommends that the Commission:

- Not request comments on the merits of CenterPoint's Petition at this time;
- Not consolidate the Company's Petition with the pending investigation in Docket No. G999/CI-21-135; and
- Not forward CenterPoint's Petition to the Office of Administrative Hearings for a contested case proceeding.

If the Commission, however, concludes that comments are necessary, the Department recommends that, at a minimum, the Commission request comment on the issues identified in the body of these comments.

/ja

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Comments**

Docket No. G008/M-21-138 and G999/CI-21-135

Dated this 2nd day of April 2021

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_21-135_Official
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-135_Official
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_21-135_Official
Alicia	Berger	Alicia.E.Berger@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-135_Official
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
Mike	Boughner	Michael.I.boughner@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-135_Official
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-135_Official
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-135_Official
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_21-135_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_21-135_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_21-135_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-135_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-135_Official
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_21-135_Official
Darcy	Fabrizius	Darcy.fabrizius@constellation.com	Constellation Energy	N21 W23340 Ridgeview Pkwy Waukesha, WI 53188	Electronic Service	No	OFF_SL_21-135_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-135_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-135_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_21-135_Official
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-135_Official
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-135_Official
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_21-135_Official
Paula	Grizzle	Paula.Grizzle@centerpointenergy.com	CenterPoint Energy	500 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-135_Official
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_21-135_Official
Joylyn C	Hoffman Malueg	Joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources	2685 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_21-135_Official
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-135_Official
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-135_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_21-135_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_21-135_Official
Miles	Kenny	miles.kenny@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_21-135_Official
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-135_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-135_Official
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-135_Official
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-135_Official
Amy	Liberkowski	amy.a.liberkowski@xcenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-135_Official
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_21-135_Official
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-135_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-135_Official
Sarah	Mead	sarah.mead@wecenergygroup.com	MERC	N/A	Electronic Service	No	OFF_SL_21-135_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_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_21-135_Official
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-135_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-135_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-135_Official
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_21-135_Official
Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-135_Official
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-135_Official
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-135_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_21-135_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_21-135_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-135_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_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_21-135_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_21-135_Official
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_21-135_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-135_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_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_21-135_Official
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official
Kent	Sulem	ksulem@mmua.org	MMUA	3131 Fernbrook Ln N Ste 200 Plymouth, MN 55447-5337	Electronic Service	No	OFF_SL_21-135_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-135_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-135_Official
Thomas	Tynes	jjazyinka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_21-135_Official
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-135_Official
Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group	605 Highway 169 N Ste 1200 Plymouth, MN 55441	Electronic Service	No	OFF_SL_21-135_Official
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-135_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-135_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_M-21-138
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_M-21-138
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_21-138_M-21-138
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-138_M-21-138
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-138_M-21-138
Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_M-21-138
Erica	Larson	erica.larson@centerpointenergy.com	CenterPoint Energy	505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	No	OFF_SL_21-138_M-21-138
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-138_M-21-138
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-138_M-21-138
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-138_M-21-138

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_M-21-138
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_M-21-138
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_M-21-138
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_21-138_M-21-138
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_M-21-138
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_M-21-138
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-138_M-21-138