



STATE OF MINNESOTA

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April 2, 2012

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Dr. Burl W. Haar
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MN Public Utilities Commission
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Re: *In The Matter Of The Office of the Attorney General's Response to the IBR Modification Workgroup Report and CenterPoint's Revenue Decoupling and Inverted Block Rate Evaluation Report*
MPUC Docket No. G-008/GR-08-1075

Dear Dr. Haar:

Enclosed for filing in the above matter, please find the *Response of the Office of the Attorney General to the IBR Modification Workgroup Report and CenterPoint's Revenue Decoupling and Inverted Block Rate Evaluation Report*.

By copy of this letter all parties have been served. An affidavit of service is also enclosed.

Sincerely,

s/Peter S. Shaw

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Enclosures

cc: Attached Service List (w/ Enclosure)

AG: #2987471-v1



STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION

Phyllis Reha
David C. Boyd
J. Dennis O'Brien
Betsy Wergin

Vice Chair
Commissioner
Commissioner
Commissioner

Docket No. G-008/GR-08-1075

In the Matter of an Application by CenterPoint
Energy for Authority to Increase Natural Gas
Rates in Minnesota

**RESPONSE OF THE OFFICE OF
THE ATTORNEY GENERAL TO THE
IBR MODIFICATION WORKGROUP
REPORT AND CENTERPOINT'S
REVENUE DECOUPLING AND
INVERTED BLOCK RATE
EVALUATION REPORT**

I. INTRODUCTION

The Office of the Attorney General ("OAG") submits these Comments in response to the IBR Modification Workgroup Report and CenterPoint Energy's ("CenterPoint" or "the Company") Revenue Decoupling and Inverted Block Rate Evaluation Report. For the reasons set forth below, the OAG agrees with CenterPoint's recommendation to maintain a flat rate pricing structure and recommends formal termination of the inverted block rate pricing structure.

II. BACKGROUND

In 2010, the Minnesota Public Utilities Commission ("the Commission") approved a pilot program in which CenterPoint would change its rate design to utilize an inverted block rate pricing structure (sometimes referred to herein as "IBR"). The IBR program went into effect in July, 2010, and was later suspended by the Commission in October, 2011.

Using inverted block rates, customers paid different rates for natural gas depending on how much gas they used; in other words, ratepayers who consumed more gas not only paid more in their total monthly bill because their overall use was higher, but also paid as much as two

times more for each unit of energy consumed. The theory behind the pilot program was to incentivize people to lower their energy consumption. *July 22, 2009 Public Comments of CenterPoint Energy*, North Mankato Public Hearing, pp. 29, 30. The premise for the Commission's approval of the pilot program was that inverted block rates should promote energy conservation without adversely affecting ratepayers. The Commission appropriately retained strict oversight over the pilot program, requiring CenterPoint to file annual reports about the impact of the program and specifically retaining the discretion to terminate the program upon "unfavorable review" or "for other cause it shall deem adequate." *June 30, 2010 Order Authorizing Implementation of Final Rates and Approving Refund Plan*, pp. 4, 5.

On June 1, 2011, the OAG filed Comments with the Commission requesting, among other things, the suspension of CenterPoint's inverted block rate program, pending further study and review. *See generally OAG June 1, 2011 Comments*. The OAG's Comments demonstrated that the program was having unfair and unintended consequences on ratepayers of all stripes. For example, the program charged higher rates to many people who had already taken all available steps within their budgets to be energy efficient, or who could not afford energy upgrades in this bad economy. The program also appeared to charge higher rates to certain customers who must use more energy for any number of reasons beyond their control, such as: (1) senior citizens, many of whom are on fixed incomes and consume more energy because they are home all day or need warmer living environments; (2) people with medical conditions who need to stay warm; (3) people who consume more energy because they have larger families; and (4) people whose family members are at home more, such as those with young children, stay-at-home parents, those who work from home and those who are unemployed. The Comments also revealed that IBR may have had a disproportionate adverse impact on some lower-income

communities. Lastly, the Comments showed that the inverted block rates were unfairly resulting in higher bills to those ratepayers billed on longer monthly cycles and who were thus pushed or kept in the higher-tier rates for longer periods of time.

Subsequently, every other party to the rate case, including CenterPoint, the Department of Commerce (the “Department”), the Suburban Rate Authority (“SRA”), Energy Cents Coalition (“ECC”), the Izaak Walton League (“IWLA”) and the Minnesota Center for Environmental Advocacy (“MCEA”), recommended suspension of the IBR program to the Commission. Community Action of Minneapolis, an organization devoted to helping low-income persons with energy assistance, also submitted a letter to the Commission, supporting the OAG’s recommendation to suspend the program.

On October 4, 2011, the Commission ordered suspension of the inverted block rate program. The Order stated:

Parties have identified unintended hardships arising from the inverted block rate structure, but have yet not [sic] been able to identify appropriate remedies. Based on a review of the record and the unanimous recommendations of the parties, the Commission concludes that the practical challenges posed by the inverted block rate structure require suspension of the program.¹

October 4, 2011 Order Suspending IBR Structure, Authorizing Workgroup, and Requiring Revised Decoupling Rate Adjustment, p. 3. CenterPoint has since reverted to a flat-rate pricing system.

The Order also authorized the formation of a workgroup to address whether to revise the inverted block rate program. *Id.* at 5. The workgroup consisted of the parties to the rate case and met several times in the winter of 2011-2012 to discuss the IBR program. On March 1, 2012, the

¹ In February, 2012, the Commission voted to order CenterPoint to adjust the bills of certain customers who were impacted by longer billing cycles under IBR. The costs of the bill adjustments will be imposed on CenterPoint’s ratepayers via the annual true-up.

workgroup submitted its IBR Modification Workgroup Report. Briefly, the report summarizes the actions of the workgroup and discusses the use of customer exemptions or “opt-outs” as a potential modification to the IBR program. The report also details and discusses the many new challenges and potential pitfalls of a new IBR program utilizing multiple opt-outs. Ultimately the workgroup as a whole did not reach a consensus as to whether and how to modify IBR. In the IBR Modification Workgroup Report, the Company recommends keeping the flat rate system and not returning to an IBR program. *IBR Modification Workgroup Report*, p. 16.

Also on March 1, 2012, CenterPoint submitted its Revenue Decoupling and Inverted Block Rate Evaluation Report. Among other things, the report summarizes certain findings regarding the impact IBR may have had on energy conservation, as well as IBR’s impact on certain ratepayer groups, such as those receiving LIHEAP. Of particular relevance to this matter, the report revealed that IBR had no measurable impact on energy conservation and indicates that IBR may not be beneficial to low-income ratepayers. *See infra* pp. 12, 13.

For the reasons set forth below, the OAG agrees with the Company’s recommendation to maintain flat rates and requests formal termination of the IBR program.

III. OPT-OUTS COULD NOT EFFECTIVELY ADDRESS THE UNFAIR IMPACTS OF IBR AND MAY LEAD TO ADDITIONAL UNINTENDED CONSEQUENCES.

The unfair impacts of IBR are now well-documented. The workgroup focused its attention on the possibility of addressing these impacts with potential modifications to the IBR structure. The only potential modification discussed at any length during the workgroup sessions was a system of exemptions designed to allow certain categories of CenterPoint ratepayers to avoid the program’s harsh impact. *See IBR Modification Workgroup Report*, p. 3. Aside from LIHEAP or other low-income customers, all opt-outs would be achieved via self-declaration, meaning customers would have to take affirmative steps to declare and notify the Company

(probably by responding to a bill insert) that they feel they are part of an exempt category of customers. The OAG does not believe an opt-out system could address the harm caused by IBR; in fact, it would lead to further unintended consequences.

A. OPT-OUTS WOULD RESULT IN SUBSTANTIAL CUSTOMER CONFUSION AND FRUSTRATION, AND DECREASED CUSTOMER ACCEPTANCE OF IBR.

The record in this rate case already reflects that the IBR program, as implemented by the Company in 2010-11, lead to substantial customer dissatisfaction and confusion over the program's billing structure, impacts and overall purpose. Public comments filed with the Commission and the OAG's Comments showed that ratepayers who took the time to contact CenterPoint about the program were not able to obtain answers to basic questions and sometimes received conflicting or confusing information. *See OAG's June 1, 2011 Comments*, p. 22. A system of opt-outs would only increase customer confusion and dissatisfaction about IBR, and would be destined to failure.

i. Confusion Regarding Eligibility

Under a modified IBR with opt-outs, customers would be sent a bill insert or notice detailing the IBR program and a list of categories under which they might qualify for an exemption. At least 10 categories of ratepayers who may merit an exemption were discussed in the IBR Modification Workgroup Report. *See IBR Modification Workgroup Report*, pp. 4-10.

As was noted by the Company in the IBR Modification Workgroup Report, customers would experience confusion regarding exemption eligibility. First, a number of customers remain unaware of the program's design and purpose. Many customers were unaware that the program existed, even before its suspension. The first hurdle of an opt-out system would thus be to ensure that all customers know why, *in the first place*, they are being asked to look over a list

of exemptions. Experience under IBR has already shown that this would present a challenge, even for those who call the Company to receive answers to basic questions about IBR. *See OAG's June 1, 2011 Comments, p. 22.*

Another important concern relating to the list of exemptions is ensuring that customers are provided with clear and concise information to determine whether or not they are eligible for an exemption. A list with multiple categories of exemptions, many of which would need to contain comprehensive and complex eligibility descriptions, would result in customer confusion. For instance, for an exemption involving customers who have already taken conservation measures, it would seem extremely difficult to define and concisely explain what qualifies as a “conservation effort” and just how much effort needs to be made, by whom and when, before the exemption applies.² In the “Certain Renters” category, it would be difficult to convey eligibility criteria in a concise manner and likely impossible for consumers to make a determination as to eligibility without reading the fine print of their lease, which may or may not state whether they are prohibited from making energy conservation efforts. It is foreseeable that, in some cases, the additional time and effort it might require to achieve eligibility information may result in some consumers abandoning exemption attempts and growing dissatisfied with IBR.

The Company agrees that there are justifiable concerns regarding increased customer confusion. It notes that the “activities required to support the potential IBR modifications...would result in increased complexity in billing, gas cost recovery true-up calculations and customer service” and that the “complexity of customer service interactions

² It would be equally difficult for stakeholders and the Commission to determine and come to a consensus as to who should qualify for eligibility under this (and other) categories, and what exactly is meant by “conservation measure.”

would increase by requiring the customer service representative to explain the IBR exemption process.” *IBR Modification Workgroup Report*, p. 15.

ii. *Frustration Regarding Exemptions*

Any list of exemptions, no matter how expansive, would still exclude many customers who feel it is unfair they are subjected to IBR. For instance, many families may have difficulty paying their heating bill under a modified IBR, especially in the winter when gas use is highest and more people are subject to high-tier IBR rates. If the family is not considered “low-income,” however, they would not be eligible for an opt-out. Additionally, in this economy, many families are experiencing temporary job loss. Last year’s tax returns may indicate a “middle-class” income, but temporary unemployment may render their present income zero. It is unclear whether the temporarily unemployed would be eligible for an IBR exemption and for how long. Assuming they are not eligible, these ratepayers would appropriately be dissatisfied with such an opt-out system.

For several reasons, many customers eligible for an opt-out under a modified IBR would not achieve exemption. First, many customers do not and will not read or pay close attention to their bills and accompanying inserts, such as an IBR exemption notification. Many customers simply pay their bills and move on with their lives, having become accustomed to inserts and bill stuffers they feel do not pertain to them. A number of CenterPoint customers pay their bills on-line and do not have or take the time to read the actual on-line statement before paying. *OAG July 21, 2011 Reply Comments*, p. 10. Second, as discussed above, the potential for customer confusion and the steps customers may have to take to determine eligibility will deter many eligible customers from seeking an exemption.

B. A SYSTEM OF EXEMPTIONS WILL REQUIRE MODIFICATIONS TO THE IBR RATE BLOCKS, WHICH COULD RESULT IN HIGHER RATES TO THOSE STILL SUBJECT TO IBR.

An exemption system would decrease the number of customers subject to IBR and would therefore require the restructuring of the IBR tiers, which were set to ensure the company recovers its estimated commodity gas costs. Should a substantial portion of high-use customers exit the IBR program, the IBR rates may have to be increased to ensure that the Company does not substantially under-collect its commodity gas costs from those remaining in the IBR program. As has been illustrated previously in this docket, many customers viewed the very highest tier rates of the IBR program as unacceptably high, to the point where they considered the rates punitive. *See OAG June 1, 2011 Comments*, p. 2. Any increase to the highest tier rates would further diminish customer acceptability and may result in additional harm to those ratepayers who cannot afford such high rates during peak gas-use months.

Additionally, it is not yet known how many customers would actually claim exemptions. The restructured rates would thus, out of necessity, be based on imperfect assumptions regarding the number of customers who may claim an exemption. This would add additional complexities to the IBR program.

C. A SYSTEM OF EXEMPTIONS WOULD LEAD TO MULTIPLE, COMPLEX TRUE-UPS.

A modified IBR featuring an exemption system would likely apply to the residential and small business customer classes and would result in two customer subclasses amongst each affected customer class: those subject to IBR and those not. Thus, there would be four subclasses of ratepayers: two IBR subclasses (one residential and one small business) and two non-IBR subclasses (one residential and one small business). The Company would have to account for these subclasses in any future true-ups, in effect performing a total of four separate

true-ups, one for each subclass. CenterPoint has not proposed a system for dealing with these additional true-ups, but it seems safe to say that such a complicated system of multiple, annual true-ups would pose additional questions and burdens for the Company, governmental regulators and the Commission. Indeed, the Company emphasizes that “[g]as cost recovery calculations complexity would increase by the need to perform separate gas cost true-up calculations for costs recovered under IBR and under flat-rates.” *IBR Modification Workgroup Report*, p. 15.

D. OPT-OUTS WOULD RESULT IN THE DISCLOSURE OF PERSONAL INFORMATION TO CENTERPOINT.

A system of exemptions would require the collection and storage of a large amount of personal data on individual ratepayers wishing to opt-out of IBR. Some of this information may be sensitive, private or confidential, such as information about an individual user’s health or finances. It is unclear whether CenterPoint, an energy utility, is equipped to store and safeguard such private information and what the legal ramifications of this information-sharing might be. It is likely many consumers would have questions and concerns regarding such a system.

Moreover, even if CenterPoint *could* safely store this information, there is the question of whether CenterPoint *should* have access to private information on perhaps thousands of individual ratepayers. Whether it is proper for a utility company to be permitted to seek and collect private and confidential information on a substantial portion of its customer base raises significant privacy concerns and should be carefully considered by the Commission.

E. CENTERPOINT WOULD SEEK TO IMPOSE THE COSTS OF ADMINISTERING AN IBR EXEMPTION ON RATEPAYERS.

In the IBR Modification Workgroup Report, CenterPoint states that certain company actions would be required to support the process of administering IBR exemptions. The Company estimates that the cost of administering the IBR exemptions would range from

\$557,000 to \$607,000 in the first year of a modified IBR program. *IBR Modification Workgroup Report*, p. 10. For each subsequent year under a modified IBR, costs are estimated to be between \$239,000 and \$289,000. *Id.* The Company states that in future rate cases it would seek to recover these increased costs in base rates to be paid by all customers. *Id.* at 15. Sufficient detail regarding the basis of the costs is not provided in the IBR Modification Workgroup Report, but the costs are clearly significant and would be ongoing as long as IBR remains in effect.

Accordingly, a modified IBR program would ultimately result in higher rates to customers, which would likely decrease customer acceptance of the program. It seems ill-advised to impose additional costs to consumers for a program that will continue to result in unfair and unintended consequences and which--as discussed below--has not been shown to impact energy conservation.

IV. A LARGE NUMBER OF OPT-OUTS MAY RESULT IN AN INEFFECTIVE AND MEANINGLESS PROGRAM.

One of the main goals of IBR was to encourage conservation. *See OAG June 1, 2011 Comments*, p. 8. As discussed below in Section VI, IBR has not been shown to lower energy use or increase conservation among ratepayers. IBR usage compared with usage before IBR is unchanged.

Nevertheless, assuming for the sake of argument that IBR could have some effect on conservation, permitting high-use customers to opt-out of the system may completely nullify any potential effect on conservation. According to its promoters, IBR is supposed to send a "conservation signal" to high-use ratepayers to encourage conservation. *Id.* Under a system of exemptions, however, high-use ratepayers (including those who merit exemptions and those who incorrectly claim an exemption) would exit the IBR program and not receive the intended "conservation signal."

V. LONGER BILLS WOULD CONTINUE TO BE A PROBLEM UNDER A MODIFIED IBR.

In the winter of 2010-11, when IBR was in effect, hundreds of thousands of ratepayers received higher gas bills due to longer monthly billing cycles, which kept them in a high-tier rate for a longer period of time or which pushed them into a high-tier rate. This issue has already been the subject of extensive briefing in this docket and was the subject a February, 2012 Commission order. The Commission ruled that CenterPoint should make billing adjustments to certain ratepayers who paid more under IBR as a result of longer billing cycles. The Commission, however, also ruled that the billing adjustments were related to the cost of gas and, thus, could be recovered by the Company in its annual true-up filing. The OAG estimates that the billing adjustments will result in an approximate \$1.2 million surcharge to residential and small business class ratepayers.

According to CenterPoint, the problem of longer billing cycles (and the resultant higher gas bills) would continue, even under a modified IBR system. Specifically, in the IBR Modification Workgroup Report, the Company states, “longer billing periods will continue to occur in the future given the current state of metering technology and it would not be possible to ensure that billing periods would be limited to a specific length such as 30 days either through metering operations or billing system changes.” *IBR Modification Workgroup Report*, p. 11.

Under a modified IBR program, the Company might be able to adjust customer bills for the length of the billing period using calculation methods which require the assumption of average per day customer usage. As noted by the Company, however, “[i]ncorporating this adjustment as an ongoing part of the monthly bill calculation would also require displaying an additional line of information on the IBR customer’s bill...” *Id.* Such a calculation would add yet another layer of complexity to an already cumbersome and unwieldy modified IBR system.

Moreover, the addition of another line item to a customer's bill may result in additional customer confusion regarding the IBR program. Finally, customer usage varies from day-to-day and a calculated, average daily use-per-customer will not necessarily equal the actual, daily use-per-customer for any specific day in the evaluation period. Therefore, any calculation based on an assumed daily use-per-customer could be unfair to ratepayers.

VI. IBR HAS NOT BEEN SHOWN TO ENCOURAGE ENERGY CONSERVATION OR TO ASSIST LOWER-INCOME PEOPLE.

In proposing IBR, parties to the rate case stated that IBR would increase energy conservation and may lead to lower bills for low-use customers, many of whom, they claimed, were low-income. *See OAG June 1, 2011 Comments*, p. 8-9; *OAG July 21, 2011 Response Comments*, p. 4. Thus, two major issues in this docket have been IBR's effects, if any, on energy conservation and low-income ratepayers.

On March 1, 2012, CenterPoint filed its Revenue Decoupling and Inverted Block Rate Evaluation Report. The report attempts to measure the effects of IBR on conservation and also focuses on the usage of LIHEAP customers. A "Key Finding" of the IBR Evaluation Report is that "IBR may have had a limited impact on aggregated usage" and that residential usage was flat when comparing weather normalized therms during the 12 month pre-IBR period and IBR periods. *CenterPoint's Revenue Decoupling and Inverted Block Rate Evaluation Report*, Section J, part 2, p. 21. In fact, CenterPoint's own study notes that while mild price elasticity (flexibility) was observed, the residential class and every residential subclass exhibited such a low level of elasticity that all price-demand relationships were considered inelastic. *Id.* at part 1, p.19. In other words, IBR and its pricing structure has had no measurable impact on conservation or consumption in general.

Another “Key Finding” of the IBR Evaluation Report is that LIHEAP customers tend to use nearly as many therms per customer as non-LIHEAP customers. *Id.* at part 2, p. 21. This finding is consistent with the previous IBR Evaluation Report, filed by CenterPoint in the spring of 2011. *See OAG’s June 1, 2011 Comments*, p. 15. Moreover, the OAG has already shown in this docket that IBR has had a disproportionate impact on some lower-income communities, when examining the number of households billed in the fifth-tier rate in January, 2011. *Id.* at 15-16. These findings, along with the recently released report, tend to show that IBR is not beneficial to lower-income people, many of whom may live in older, less efficient houses and do not have the resources to invest in energy-saving measures, such as efficient furnaces.

In sum, the recently released IBR Evaluation Report shows that a primary goal of IBR--energy conservation--has not been met in any measurable way. Moreover, another key goal of IBR--increased low-income affordability--has not been proven.

VII. THE COMMISSION SHOULD TERMINATE IBR.

The Commission retained the discretion to terminate IBR upon “unfavorable review” or “for other cause it shall deem adequate.” *June 30, 2010 Order Authorizing Implementation of Final Rates and Approving Refund Plan*, pp. 4, 5. Due to a myriad of unfair and unintended consequences, IBR has already been suspended. The parties have met to discuss possible improvements to the IBR program, but have not reached consensus. In fact, after trying to tackle the problems associated with IBR head-on, the only proposal is a system of opt-outs which, for the reasons discussed above, would result in an ineffectual IBR program, increased customer confusion, higher rates, additional complexities and unfair and unintended results. The proposed “solution” may be worse than the first attempt.

It should be noted that the Company does not recommend returning to IBR, but instead recommends keeping a flat-rate system.

VIII. CONCLUSION

A modified IBR program will not redress the unintended and unfair consequences which led to the suspension of IBR in the first place. In fact, it would result in additional harm, complexity and customer confusion. In addition, the IBR program has not been shown to increase energy conservation or benefit lower-income ratepayers. For these reasons, the OAG recommends that the Commission formally terminate the IBR program at this juncture.

Dated: April 2, 2012

Respectfully submitted,

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s/Peter J. Shaw

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