

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

Katie Sieben	Chair
Joseph Sullivan	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

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

**COMMENTS OF THE OFFICE OF
THE ATTORNEY GENERAL**

INTRODUCTION

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits the following Comments in response to the petition of CenterPoint Energy Resources Corporation, d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint” or “Company”) for recovery of \$500 million in elevated gas-supply costs that the Company incurred over a six-day span in February 2021. Under the established ratemaking process, CenterPoint would begin recovering these costs in September. Here, the Company asks the Commission to depart from the ordinary process and grant the Company special permission to start rate recovery in May—four months earlier than it normally would. In addition to this extraordinary departure from the normal process, CenterPoint further asks the Commission to let it impose monthly financing charges at a rate of *nearly nine percent* until the full balance is collected. This request would result in ratepayers paying an extra \$60 million in interest at a time when many of them are already behind on their bills.

The Commission should not allow CenterPoint to recover any money for these increased gas costs unless the Company can meet its burden to prove that they were reasonably and prudently incurred. Due to the sheer scale of the costs and the many factual issues that need to be resolved,

the Commission should refer the Company's petition to the Office of Administrative Hearings for a contested case. The Commission should delay this referral until it has completed its industry-wide investigation into the February 2021 price spike,¹ which involves many of the same issues as CenterPoint's petition.

Finally, if the Commission grants CenterPoint's request to begin recovering gas costs before their prudence is determined, it should take additional steps to protect ratepayers. Most importantly, the Commission should deny CenterPoint's attempt to profit off a crisis by charging additional interest, particularly when ratepayers had no advance warning of the price spike. The Commission should also establish a mechanism to preemptively halt recovery upon a *prima facie* showing that specific costs are unrecoverable.

BACKGROUND

Minnesota law allows the Commission to permit utilities to automatically adjust charges for delivered natural gas.² Under this authority, the Commission has established a process whereby utilities forecast their gas-supply costs each month and update the purchased-gas adjustment ("PGA") line item on customer bills to reflect the expected commodity prices for the coming month.³ Actual market prices inevitably differ from the forecasted prices. Therefore, in addition to making forecasted monthly adjustments, utilities are permitted to annually adjust, or "true up," their PGA charge to account for any cumulative over- or under-recovery during the preceding year.⁴ This true-up occurs in September and is calculated to refund any surplus, or recoup any

¹ *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.

² See Minn. Stat. § 216B.16, subd. 7 (allowing for the automatic adjustment of charges "in direct relation to changes in" direct costs for natural gas delivered).

³ See Minn. R. 7825.2500 (permitting automatic adjustment of charges for "[c]hanges in cost resulting from changes in the commodity-delivered gas cost and demand-delivered gas cost for purchased gas"), .2700, subp. 3 (specifying computation of adjustment), .2920, subp. 1 (providing for provisional approval upon filing).

⁴ See Minn. R. 7825.2700, subp. 7 (specifying computation of true-up).

shortfall, over the following 12 months. The true-up generally takes effect before the Commission has an opportunity to review the gas costs for prudence.

In this case, CenterPoint seeks to begin recovering the February 2021 price spike costs four months earlier than usual but proposes to recover them over 24 months rather than 12. The Company pitches its proposal as lessening the monthly rate impact on customers. But CenterPoint undercuts this benefit by proposing to charge ratepayers interest on uncollected amounts at its tax-adjusted rate of return, or 8.72 percent. This rate is a blend of CenterPoint's short- and long-term borrowing costs and an even higher return on equity designed to entice capital investors.

CenterPoint estimates that the total cost of its proposal to an average residential customer would be \$393, more than ten percent of which (approximately \$40) consists of interest charges.⁵ The impact of the interest charge alone is larger than the annual bill impact of CenterPoint's last general rate increase.⁶

ANALYSIS

The ability to automatically adjust gas charges each month and to true them up annually provides a great benefit to CenterPoint. Normally, utilities are only allowed to raise their rates by filing a rate case and establishing the prudence of increased costs to the Commission's satisfaction following months of careful scrutiny. But the PGA mechanism gives CenterPoint a nearly frictionless process to obtain expeditious recovery of gas costs. This mechanism significantly reduces commodity-price-related risks for the utility's shareholders, while increasing them for ratepayers. And although CenterPoint retains the legal burden to demonstrate the prudence of

⁵ Compare Petition, Ex. B at 1, lines 9 and 11 (showing bill impacts of \$131 in year one and \$262 in year two for the Company's preferred recovery method) *with id.* line 6 (showing a total bill impact of \$354 under the normal recovery process).

⁶ See Docket No. G-008/GR-19-524, Offer of Settlement at 19 (Sept. 17, 2020) (showing overall residential rate increase of \$26.2 million); CPE Reply Br. at 11 n.35 (Oct. 23, 2020) (stating that CenterPoint has approximately 800,000 residential customers). \$26.2 million / 800,000 customers = \$32.75 per customer.

automatically adjusted charges after the fact, the OAG is not aware of any case in which a utility has been required to disgorge gas costs previously collected.

We do not yet know whether CenterPoint acted prudently when natural gas prices rose because it is unclear what steps the Company took to mitigate these high prices. As one Commissioner recently observed, the Company did not notify customers of these high prices until they had fallen back into the “normal” range. This meant that CenterPoint’s firm customers likely took no steps to adjust their consumption during this period of extraordinarily high prices. We also do not yet know if the Company maximized other options it had to limit harm to ratepayers.

These circumstances are concerning. They are also reflective of a regulatory framework that allows CenterPoint to pass through gas costs to ratepayers without the inconvenience of a rate case or, indeed, *any* prior review for prudence. This framework may work well the vast majority of the time—when prices fall within a normal range and the Company can maintain steady bills and use small true-ups to correct any under- or over-collection. But CenterPoint now seeks to modify that process following a crisis in a way that is lucrative for its shareholders: The Company would begin to receive money earlier than normal, and it would be able to charge interest on the uncollected amount.⁷

For these reasons, and the reasons discussed below, CenterPoint’s petition should be referred to the Office of Administrative Hearing (“OAH”) for contested-case proceedings. Further, if the Commission allows the Company to start recovering costs before the contested-case

⁷ The Company has suggested that its petition would benefit ratepayers by recovering these increased costs over a longer period than the standard PGA process. The OAG agrees that the typical PGA process should not be used to recover the prudently incurred costs of the recent price spike. It disagrees, however, that the Company’s proposal should be adopted simply because it might be viewed as being marginally better than the PGA process. Rather, the Commission should adopt the best plan to protect ratepayers and support the public interest.

process concludes, it should only do so under specific conditions to protect ratepayers that are detailed below.

I. BECAUSE OF THE LARGE COSTS INVOLVED AND THE NEED TO RESOLVE DISPUTED FACTUAL ISSUES, THE COMMISSION SHOULD REFER THIS MATTER TO THE OFFICE OF ADMINISTRATIVE HEARINGS FOR A CONTESTED CASE.

The Commission is required to refer this matter to the OAH for contested-case proceedings if it “finds that all significant issues have not been resolved to its satisfaction.”⁸ CenterPoint’s petition raises significant issues that need to be resolved. Furthermore, the issues presented will have a tremendous effect on ratepayers’ bills and implicate many underlying factual disputes. Accordingly, the Commission should refer this matter to the OAH for a contested case.

The Commission routinely refers general rate cases to the OAH. This proceeding is not a general rate case, but the amount of costs at issue is appreciably larger than in a normal rate case. In its last rate case, CenterPoint received an annual increase of approximately \$38.5 million.⁹ In this case, it is requesting recovery of excess gas costs of \$500 million—a staggering 13 times the size of the Company’s last rate increase—incurred over *just six days*. Such a dramatic increase by itself merits the scrutiny that comes with a contested case.

While the amount alone is sufficient to justify the added process of a contested case, there are specific questions that should be answered before the Commission blesses such a dramatic increase in ratepayers’ bills. Specifically, ratepayer advocates need an opportunity to inquire into the reasonableness of CenterPoint’s plans and procedures for responding to gas-price increases, and whether the Company effectively implemented those plans and procedures during the February 2021 price spike. The standard notice-and-comment process will not be adequate to thoroughly explore these complex and fact-based issues. Rather, a contested case is necessary

⁸ Minn. R. 7829.1000.

⁹ Docket No. G-008/GR-19-524, Offer of Settlement at 2 (Sept. 17, 2020) (stating allowed overall revenue increase).

because it will allow advocates to probe these issues through formal discovery, prefiled testimony, and cross-examination of witnesses.

In addition, the cart-before-the-horse nature of CenterPoint's cost-recovery request presents a danger of a *de facto* burden shift. CenterPoint bears the legal burden of establishing that rates incorporating the February 2021 price spike would be just and reasonable.¹⁰ Any doubt as to reasonableness must be resolved in favor of ratepayers.¹¹ In a contested case, applying this burden would be straightforward because the Company would affirmatively need to bring forth evidence to meet its burden. If CenterPoint's proposal is adopted, however, this burden could be turned on its head.

CenterPoint is effectively asking the Commission for hundreds of millions of dollars without a prudence review, with the vague notion that the prudence of these costs will be addressed at some point in the future. With CenterPoint holding the money, ratepayer advocates would be in the difficult position of arguing against the *status quo* and could be forced to identify specific instances where the Company acted imprudently or unreasonably to prove that the money CenterPoint holds should be returned. Ratepayer advocates should not need to make such a showing to prevent recovery. Instead, CenterPoint needs to affirmatively establish reasonableness and prudence in order to be entitled to recovery. A contested case will require it to do that.

For the foregoing reasons, the Commission should refer this matter to the OAH for a contested case. The Commission should hold this contested case in abeyance until it has resolved some of the broader issues in its industry-wide investigation in Docket No. 21-135, which cut across multiple utilities and will inform its decision in this case.

¹⁰ See Minn. Stat. § 216B.16, subd. 4.

¹¹ Minn. Stat. § 216B.03.

II. IF THE COMMISSION ALLOWS CENTERPOINT TO BEGIN RECOVERING COSTS RELATED TO THE FEBRUARY 2021 PRICE SPIKE, IT SHOULD IMPOSE SEVERAL CONDITIONS TO PROTECT RATEPAYERS.

The Commission has not yet sought comments on the substance of CenterPoint's proposal. But if the Commission ultimately sees a benefit in pushing up the start date of CenterPoint's 2021 PGA true-up, it may need to move forward quickly. The OAG therefore offers its initial thoughts on several issues related to the substance of CenterPoint's petition so that the Commission can make decisions with as full a record as possible. The conditions discussed below are crucial to protect ratepayers in light of the *de facto* burden shift that will occur once cost recovery begins.

First, the Commission should reject CenterPoint's proposal to make ratepayers pay interest that includes windfall profits for shareholders. Second, any recovery should be conditioned on a clear process for establishing prudence, such as a contested case, *and* a mechanism to automatically halt recovery of costs if specific questions have been raised as to their recoverability. Third, the surcharge should take the form of a per-dekatherm amount, rather than a fixed monthly amount as CenterPoint proposes. Finally, the Commission should adopt a reduced surcharge for low-income customers, whose amount should account for any other available low-income relief.

A. The Commission Should Reject CenterPoint's Attempt to Profit off of a Crisis.

It is deeply troubling that, in addition to passing the increased gas costs onto ratepayers with limited process, CenterPoint is trying to profit off of this crisis by charging ratepayers interest equal to its full tax-adjusted cost of capital. This charge would hit ratepayers, many of whom are already in financial distress due to the ongoing pandemic, with an additional \$58 million on top of the \$500 million that CenterPoint is already asking them to pay for the February 2021 price spike.¹² Ratepayers had no advance warning of the price spike and therefore no way to mitigate its costs.

¹² Petition, Ex. B at 6, line 33 (showing total interest of \$57,605,082).

Under these circumstances, charging them interest borders on unconscionable, and is certainly neither just nor reasonable.

Notably, the annual PGA true-up process does not normally include interest or other financing charges. This is true whether or not a utility has over- or under-collected its gas costs during the preceding year: If the utility undercharges for the actual cost of gas, it does not receive interest on the uncollected balance. Conversely, if the utility overcharges for the actual cost of gas, it does not have to pay interest to ratepayers. The process is symmetrical since neither party gets compensated for the time value of money.

It is patently unfair for CenterPoint to have benefitted from this mechanism by overrecovering gas costs in the past without incurring interest, but now to ask ratepayers to pay a premium when the shoe is on the other foot. The Company's request to start collecting February price-spike costs in May would significantly mitigate financing-related concerns by bringing money in the door *several months earlier* than under the normal regulatory process. While the magnitude of these costs might justify mutually beneficial modifications to the normal process, such as beginning recovery sooner in exchange for extending it over a longer period to insulate ratepayers from rate shock, this crisis should not become an opportunity for the Company to profit by tacking a carrying charge onto a commodity cost that is normally recovered dollar for dollar.

Additionally, CenterPoint's authorized return already incorporates the regulatory structure for gas utilities in Minnesota, including the risks and benefits of the PGA mechanism. In CenterPoint's most recent rate case, the Company offered testimony about the impact of a utility's regulatory environment on its cost of capital.¹³ The Company's witness explained the positive effect that "predictability and consistency" of regulators' decision-making has on a utility's credit

¹³ Docket No. G-008/GR-19-524, Bulkley Direct at 99 (Oct. 28, 2019).

worthiness.¹⁴ In that same rate case, CenterPoint’s “Statements of Operating Income” indicate that the cost of gas sold made up more than 74 percent of its operations and maintenance (“O&M”) expenses.¹⁵ Presumably, the Company’s proposed cost of capital factored in the risks and benefits of the PGA mechanism, on which recovery of nearly three quarters of the Company’s O&M expenses depends. The Commission should not let CenterPoint use this crisis to claim additional profits for risks that are already baked into its authorized rate of return.

B. The Commission Should Establish a Failsafe Mechanism to Automatically Halt Cost Recovery.

These Comments have already discussed the burden shift that will occur in practice if the Commission allows CenterPoint to start recovering costs without first showing that they are prudent. To help counter this burden shift, the Commission should refer this matter for a contested case with the express understanding that any costs the Company does not ultimately prove were prudently incurred, or that are offset by government aid or other funding sources, are subject to disgorgement. A contested case by itself, however, will not afford sufficient protection to ratepayers if it occurs after cost recovery has begun. Therefore, if the Commission allows cost recovery to start before the contested case is complete, it should establish a mechanism whereby its Executive Secretary or a designated party such as the Department can automatically stop cost recovery upon a *prima facie* showing that specific costs are unrecoverable.

There are a number of ways such a mechanism could be structured. One way would be to calibrate the surcharge to recover the estimated cost of the February 2021 event over two years, as CenterPoint proposes, but specify that the surcharge automatically expires after one year unless the Company renews it. To renew the surcharge, the Company would make a filing in this docket

¹⁴ *Id.* (internal quotations omitted).

¹⁵ Docket No. G-008/GR-19-524, Initial Filing—General Rate Petition, Sched. C-1 (Oct. 28, 2019).

60 days before the expiration date. The Executive Secretary would then have to approve the filing for cost recovery to continue. Alternatively, the surcharge could be deemed renewed after 30 days unless a designated party or parties registered an objection within that period. An objection would automatically halt cost recovery at the halfway point, providing the Commission and parties an opportunity to reexamine the surcharge in light of actual collections, any available federal or state aid, and developments in the contested case or the Commission's industry-wide investigation.

C. The Commission Should Require CenterPoint to Structure the Surcharge as a Volumetric Rate.

CenterPoint proposes to recover the February 2021 gas costs through fixed monthly surcharges that vary by summer and winter season. The OAG supports seasonally varying charges because they allow fewer costs to be recovered during the winter, when customers' heating bills are already higher and their energy burdens therefore greater. The Commission should not, however, allow CenterPoint to use fixed charges to recover commodity gas costs, which are classic energy costs that are normally recovered on a per-unit basis. Instead, the Commission should require CenterPoint recover these costs through a volumetric surcharge that varies by summer and winter season.

While there is no perfect way to recover the costs of an event like the February 2021 price spike, a per-dekatherm surcharge is the fairest practicable option. The Commission generally favors using volumetric charges for costs that vary with energy usage, such as the cost of gas. This is because a volumetric charge sends a clear price signal that helps customers make economically efficient decisions, allows them to control their bills, and encourages them to conserve energy. And while a variable surcharge will not tell customers anything about the cost of their gas usage during February 2021, neither do CenterPoint's fixed charges. CenterPoint's surcharges would also have the unfortunate effect of penalizing customers with low winter usage, such as people in

smaller homes or those who have taken measures to conserve. A fixed charge would punish these customers, who likely used less gas during the February 2021 price spike but would not be able to avoid paying for the spike if it is recovered as a fixed charge.

For these reasons, the Commission should require CenterPoint to use a volumetric surcharge that varies by season. The Company has provided an example of this type of surcharge on the final page of Exhibit B to its petition, which it refers to as “Alternative 24 Month Volumetric with Low Income and Staggered Increase and Summer/Winter Rates.”

D. Low-income Surcharges Should Account for any Available State or Federal Low-income Rate Relief.

CenterPoint proposes to charge low-income customers only half of what it charges non-low-income residential customers. The OAG strongly supports giving low-income customers a reduced surcharge, and the Commission should make every effort to protect households of limited means who are least able to afford another bill. In setting a low-income surcharge, however, the Commission should be mindful that low-income ratepayers are likely to receive additional relief from state and, potentially, federal sources.

The Minnesota Legislature is currently considering a bill that would provide low-income ratepayers relief from the February 2021 price spike.¹⁶ If the Commission initially sets residential surcharges without accounting for this low-income aid, it should preserve the ability to quickly adjust the surcharges after the legislation passes. Depending on the amount of aid that is allocated to CenterPoint’s low-income customers, an adjustment may not be necessary, but the Commission will at minimum need to consider whether the rate subsidy in favor of low-income customers should be adjusted in light of any additional government relief they receive. Failing to account for

¹⁶ See H.F. 2216 and S.F. 2132, 92nd Leg., Reg. Sess. (Minn. 2021)

the impact of state or federal relief could lead to CenterPoint overrecovering gas costs from residential ratepayers.

CONCLUSION

Minnesota's PGA mechanism provides CenterPoint and its shareholders with significant benefits. The Company has accepted these benefits for many years without complaint. Now, following a catastrophic price spike, CenterPoint seeks not only to pass through these elevated gas costs, but also to wrest additional profits from ratepayers. The Commission should reject the Company's request to recover interest, require it to prove that its actions were prudent through a contested-case proceeding, and only allow cost recovery to begin under conditions that safeguard ratepayers' interests.

For these and all the foregoing reasons, the OAG recommends that the Commission take the following actions:

1. Refer this matter to the Office of Administrative Hearings for a contested case, holding the contested case in abeyance until the Commission completes its industry-wide investigation of the February 2021 price spike; and
2. If the Commission allows cost recovery for the February 2021 price spike to begin before the contested case concludes,
 - a. Reject CenterPoint's request to recover financing charges;
 - b. Establish a failsafe mechanism to automatically halt cost recovery;
 - c. Require CenterPoint to use a volumetric surcharge; and

- d. Consider the impact of any state or federal low-income rate relief in designing residential surcharges.

Dated: April 2, 2021

Respectfully submitted,

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April 2, 2021

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

Re: *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

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.
Sincerely,

s/ **Peter G. Scholtz**

PETER G. SCHOLTZ

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CERTIFICATE OF SERVICE

Re: *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

I, JUDY SIGAL, hereby certify that on the 2nd day of April, 2021, I e-filed with eDockets *Comments of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal

JUDY SIGAL

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