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July 3, 2018

Via Electronic Transmission Filing

Mr. William Grant
Deputy Commissioner
Division of Energy Resources
Minnesota Department of Commerce
85 Seventh Place East, Suite 500
St. Paul, MN 55101-2198

RE: **Request to Modify CenterPoint Energy's 2017-2019 Triennial Conservation Improvement Program Plan**
Docket No. G008/CIP-16-119

Dear Deputy Commissioner Grant:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company"), respectfully submits the attached formal modification for its On-Bill Loan Repayment program. The On-Bill Loan Repayment program is a new offering that is intended to provide a simple and convenient way for customers to pay for energy efficiency improvements to their property via their CenterPoint Energy natural gas bill. While the Company will not provide the capital for the loans, CenterPoint Energy will work with its implementation partner to process loan payments from customers to participating lenders. The Deputy Commissioner approved the On-Bill Loan Repayment program as part of the Company's *2017-2019 Conservation Improvement Program Triennial Plan (Triennial Plan)*,¹ "with the understanding that [CenterPoint Energy] will file a formal modification so that the Department and interested parties can review how [CenterPoint Energy] addresses the outstanding program design questions and the program's participation goals."²

Following the issuance of a request for proposal and vendor selection process, the Company has selected an implementation partner for the On-Bill Loan Repayment program. CenterPoint Energy and its implementation partner have been working to clarify program design details in preparation for this modification request, as well as planning technical integration of billing and project implementation systems. Selecting and contracting with an implementation partner took longer than the Company had originally expected, and as a result more of the program design and technical integration work will take place in 2018 rather than 2017. The Company expects to be able to begin processing loan payments via its bills in early 2019.

The Company stated in the initial program proposal included in the Company's *Triennial Plan (Original Proposal)* that it preferred its implementation partner to not also be a lending entity itself. However,

¹ CenterPoint Energy's Approved 2017-2019 Conservation Improvement Triennial Plan, Docket No. G008/CIP-16-119 (revised version filed June 5, 2017).

² *In the Matter of CenterPoint Energy's 2017-2019 Natural Gas Conservation Improvement Program Triennial Plan*, Docket Nos. G008/CIP-16-119, *et al.*, Deputy Commissioner Decision, p. 24 (Nov. 3, 2016).

after completing the vendor selection process, CenterPoint Energy chose the Center for Energy and Environment (CEE) as its implementation partner. CEE is a non-profit entity with extensive experience providing loans to CenterPoint Energy's Minnesota customers. Given the implementation partner selected, CenterPoint Energy believes allowing CEE to participate in the program as a lender will be beneficial for participating customers. CenterPoint Energy expects CEE to be the only participating lender at program launch. However, CenterPoint Energy intends to add more lenders to the On-Bill Loan Repayment program after launch, and CEE, as program implementer, is already in discussions with other potential On-Bill Loan Repayment program lenders, including the Minnesota Housing Finance Agency.

This modification builds from the initial program proposal included in the Original Proposal. As stated in the Original Proposal, all aspects of the program will be designed to meet the requirements established by the enabling language for utility on-bill offerings in Minn. Stat. § 216B.241 Subd. 5d. This modification starts with a high-level description of how the Company envisions the on-bill loan repayment process will operate from a customer perspective, and then goes on to address the following unresolved program design issues:

- CenterPoint Energy criteria for customers eligible for on-bill loans;
- CenterPoint Energy criteria for energy efficiency measures eligible for on-bill loans;
- CenterPoint Energy criteria for trade allies eligible to connect customers to on-bill loans and quality assurance protocols;
- CenterPoint Energy criteria for lenders and loans eligible to participate in the on-bill program; and
- Program participation goals and evaluation metrics.

In addition, the Company is requesting modifications to 2018 and 2019 program budgets to reflect a revised timeline for On-Bill Loan Repayment program development and launch as well as a more accurate understanding of program cost.

Overview of the On-Bill Loan Repayment Process

From a customer perspective, the On-Bill Loan Repayment process will begin when the customer is discussing home repairs or upgrades with a trained repair technician, contractor, sales person, or other CenterPoint Energy trade ally. During the equipment bid or sales process, the trade ally will use a dedicated new secure online portal to initiate the process of connecting the customer to available financing for their purchases.

The customer and/or trade ally will supply customer information to verify the customer's basic eligibility to participate in the On-Bill Loan Repayment program (see details under "Eligible Customers" below). If the customer is not eligible to proceed, the customer/trade ally will be notified and no further steps will be taken. However, if the customer is eligible according to basic program criteria, they and/or the trade ally will submit additional information about the products and services to be included in the loan and the reason for installation.³ A formal loan application process will follow, with the customer and/or trade ally providing additional supplemental information as required and receiving information on

³ The rationale for this last component is consumer protection. While the Company hopes and expects that the On-Bill Loan Repayment offering will be used to enable customers to make useful energy efficiency upgrades, the Company wants to guard against the possibility that an unscrupulous contractor could use the On-Bill Loan Repayment program to sell unneeded equipment or services.

various loan products the customer is qualified to obtain and that will best meet their needs. If the loan is approved, the lender will work with the customer to finalize the loan and disburse funds. Prior to finalizing the loan, customers will be notified of, and agree to abide by, On-Bill Loan Repayment program rules.⁴ Loan and payment installment information will then be transferred to CenterPoint Energy to be included on the customer's monthly utility bill.

Customers' monthly loan payments will be reflected on their natural gas utility bills.⁵ CenterPoint Energy will collect loan repayment money from the customer along with monthly gas bill payments and transmit the money through the implementation partner to the lender. In the event that a customer does not pay the full amount due on a monthly natural gas bill, any amount paid will be applied first to the utility portion of the bill⁶ and any other CenterPoint Energy charges. In the event that a customer pays more than the full amount due on a natural gas bill, additional funding will be credited to the customer's account. Customers will be able to direct additional/early loan payments through the Company's implementation partner.⁷

In the event that a customer enrolled in the On-Bill Loan Repayment program falls three billing cycles⁸ in arrears for the on-bill loan portion of their natural gas bill, that customer's loan will be removed from the On-Bill Loan Repayment program, and the customer and lender must make arrangements for an alternate payment method. Customers will also be removed from the On-Bill Loan Repayment program if they move out of CenterPoint Energy's Minnesota service territory. Prior to finalizing the loan, customers will be notified of circumstances in which they may be removed from the On-Bill Loan Repayment program, and will affirm their understanding that they remain responsible for the loan and will need to make arrangements with the lender for repayment. In the event that a customer moves out of the property where the energy efficiency measures were installed (whether they move within or outside of CenterPoint Energy's Minnesota service territory) they will continue to be responsible for payment of the loan; it will not transfer to the new occupant.⁹

Eligible Customers

As the Company stated in the Original Proposal, the initial on-bill offering will be available only to CenterPoint Energy's Minnesota residential natural gas customers. In addition, CenterPoint Energy will restrict eligibility to customers that have not been late on their CenterPoint Energy bill more than three times in the last twelve months and have a past-due balance of no more than \$50 at the time of application.

⁴ For example, customers will agree to pay their loan installments on their natural gas bills.

⁵ CenterPoint Energy has not finalized its plan for bill presentation, but anticipates identifying On-Bill Loan Repayment program charges as "Conservation Improvement Program On-Bill Loan Repayment Program" or similar. The Company does not anticipate identifying the lender or the Company's implementation partner on the bill itself.

⁶ Minn. Stat. § 216B.241, Subd. 5d(g).

⁷ The Company is working to develop the functionality for customers to direct early loan repayment through CenterPoint Energy's website, but does not expect this functionality to be available at the time of program launch.

⁸ A CenterPoint Energy billing cycle is roughly thirty-days long, but may be slightly shorter or longer depending on the dates of weekends and holidays. Customers will be notified at the time that they fall two billing cycles behind that their loan may be removed from the On-Bill Loan Repayment program and provided with the date on which that will happen if payment is not received.

⁹ Minn. Stat. § 216B.241, Subd. 5d(h).

CenterPoint Energy will not restrict customer participation based on credit or income criteria; however, CenterPoint Energy stresses that lenders participating in the On-Bill Loan Repayment program may specify additional criteria for loan eligibility. Thus, some customers may satisfy CenterPoint Energy's eligibility criteria, but would be nonetheless unable to participate in the On-Bill Loan Repayment program because they do not meet the criteria of any participating lender. The Company hopes, over time, to include a robust set of lenders and loan options in the program so that as many customers as possible will qualify for a loan product that suits their needs.

CEE has informed CenterPoint Energy that at program launch it expects to offer loans to applicants with a credit score of 600 or higher. CEE plans to offer loans with 6.99 percent interest to applicants with credit scores between 600 and 679, and loans with 4.99 percent interest to applicants with credit scores of 680 or above. CEE also expects to limit its loans to owner-occupied properties. CEE does not anticipate requiring a particular loan-to-value ratio or income limit. CEE's interest rates, fees, and loan terms are subject to change.

The Company is providing this information about CEE's proposed eligibility criteria for informational purposes only. The Company will allow participating lenders to select eligibility criteria that suit their needs and modify those criteria at the lender's discretion.

Eligible Measures

CenterPoint Energy proposes to allow loans for most residential measures eligible for rebates including:

- Furnaces with a minimum 92 percent annual fuel utilization efficiency (AFUE);
- Boilers with a minimum 83.5 percent AFUE;
- Programmable, communicating, and analytics-capable thermostats installed with a qualifying heating system;
- Electronic ignition hearth products;
- High-efficiency water heaters (conventional tank, tankless, indirect, or heating/water heating combo systems) with minimum efficiencies depending on type, draw pattern, and storage capacity;
- ENERGY STAR® clothes washers and natural gas dryers;
- Wall insulation in a home with natural gas heating, improving exterior wall spaces from an insulation level of R-5 or less to a level of R-11 or greater;
- Attic air sealing in a home with natural gas heating; and
- Attic insulation installed with air sealing in a home with natural gas heating, improving the attic thermal boundary from a level of R-30 or less to a value of R-49 or greater.

Specifically, all measures eligible for a rebate under one or more of the Company's Residential Segment programs will be eligible for On-Bill Loan Repayment except for thermostats,¹⁰ furnace or boiler tune-ups, and whole home construction eligible for a performance-based rebate under the Company's High-Efficiency Home program. Minimum efficiency requirements for the On-Bill Loan Repayment program will be the same as in the Company's Residential Segment projects.

¹⁰ Thermostats will be eligible for On-Bill Loan Repayment program financing if installed along with a qualifying heating equipment.

In addition, the Company will allow loans that include funding for equipment or services necessary for the installation of eligible efficient natural gas equipment or insulation or typically installed with eligible natural gas equipment or insulation. For example, the Company would allow funding for the following to be included the On-Bill Loan Repayment program:

- Services or equipment necessary to safely complete rebate-eligible air sealing or insulation such as ventilation, bath fans, electrical upgrades, and asbestos and radon mitigation;
- Repairs or repainting of wall surfaces damaged by the installation of rebate-eligible insulation;
- Modifications to or cleaning of venting or duct work necessary to safely install rebate-eligible water heaters or heating equipment;
- Central air conditioners, mini-split systems, or heat pumps installed along with eligible natural gas heating equipment; and
- ENERGY STAR® rated windows and/or doors installed along rebate-eligible insulation measures.

In cases where funding for electric equipment is included in an On-Bill Loan Repayment loan the Company may require the electric equipment to meet minimum efficiency standards. For example, when an air conditioner is funded along with eligible heating equipment, the Company will require that the air conditioner has a SEER Rating of at least 14.¹¹

The Company will not extend the On-Bill Loan Repayment program to offer loans for equipment and services unrelated to rebate-eligible natural gas equipment. For example, the Company will not allow loans for electric appliances that are not typically installed along with natural gas equipment (*e.g.* refrigerators) or distributed electric generation equipment (*e.g.* rooftop solar). The Company believes that offering such measures through the On-Bill Loan Repayment program would not serve the primary purpose of the Company's Conservation Improvement Program (CIP), which is to help CenterPoint Energy's customers conserve natural gas. Moreover, the Company does not believe it has the expertise to adequately administer a program that extends so far beyond natural gas equipment and natural gas savings opportunities.

The Company will also not extend the On-Bill Loan Repayment program to loans for equipment installed or work begun before the loan was issued,¹² loans for working capital, debt serving, or the refinancing of existing debts, or loans for equipment installed by or work performed by the homeowner. Loans may not be issued unless there is at least one bid for the work or equipment, listing the work to be done and/or equipment to be installed and the related efficiency ratings.

CenterPoint Energy notes that participating lenders may choose not to offer loans for all equipment eligible under the Company's criteria. Thus, the Company's eligibility criteria for measures may be broader than what will be actually available through the program.

CEE has indicated that, at program launch, it will offer loans for at least the rebate-eligible measures listed above, as well as air conditioners, ENERGY STAR® rated windows and doors, ventilation, bath fans,

¹¹ 14 is the minimum SEER rating listed in the State of Minnesota Technical Reference Manual. State of Minnesota Technical Reference Manual for Energy Conservation Improvement Programs, Version 2.2, Docket No. E,G999/CIP-15-896 (Dec. 14, 2017).

¹² The Company may make exceptions to this requirement for good cause on a case-by-case basis. For example, the Company anticipates making exceptions to this requirement in emergency situations requiring immediate equipment replacement.

necessary electrical upgrades, asbestos and radon mitigation, exterior or interior wall repair, and HVAC cleaning installed or performed along with the installation of rebate-eligible measures. The Company is providing this information about CEE's proposed measure eligibility criteria for informational purposes only. CenterPoint Energy will not require lenders to offer loans for any particular list of equipment or services and will allow lenders to discontinue or introduce loan products for additional eligible equipment or services at the lender's discretion.

Trade Ally Eligibility and Quality Assurance

In designing the trade ally eligibility and quality assurance rules it describes in this section, the Company attempted to balance the goal of encouraging program participation with the goals of protecting customers from unscrupulous sales practices and keeping ongoing administrative costs low. The Company hopes to make it relatively simple and easy for reputable trade allies to offer loans through the program.

The Company will limit eligibility for home insulation or air sealing loans to trade allies eligible to participate in the Company's Home Insulation Rebates program. The Home Insulation Rebates program only allows participation by contractors that have complied with a robust quality assurance process. More details about Home Insulation Rebates program quality assurance are included in the Company's *Triennial Plan*.

For other measures, the Company will require that the trade ally hold all required licenses to install the equipment to be funded by the loan. The Company may also establish trade ally insurance requirements, require trade allies to warrant their installation work, and/or require evidence that the trade ally is trained and in good-standing with the manufacturer of the equipment to be installed. CenterPoint Energy will also require that installers be in good standing with CenterPoint Energy's rebate processing center.

CenterPoint Energy's implementation partner will conduct quality assurance of a subset of non-insulation or air-sealing measures for which On-Bill Loan Repayment program loans are issued to ensure that eligible equipment was installed, that loan amounts do not exceed the cost of eligible equipment and services, and that the equipment installed or work completed was reasonably necessary. This quality assurance will include desk review of equipment service specifications and pricing as well as the rationale for the installation of the equipment or service. Trade allies will also be required to comply with reasonable quality assurance processes established by individual participating lenders.

In addition to the eligibility criteria described above, all trade allies wishing to participate in the On-Bill Loan Repayment program will be required to complete On-Bill Loan Repayment training and sign an agreement with CenterPoint Energy agreeing to abide by program terms and conditions. The training will familiarize trade allies with basic details about the On-Bill Loan Repayment program so they can answer customer questions, and teach trade allies how to pre-qualify customers for the loan application process through the online portal.

CenterPoint Energy will require that equipment be installed within 120 days of the issuance of the loan.¹³ The Company will also require all participating trade allies to submit rebate applications for all CenterPoint Energy rebate-eligible equipment installed via On-Bill Loan Repayment financing.

¹³ CenterPoint Energy may extend this deadline for good cause on a case-by-case basis.

CenterPoint Energy's rebate processing will serve as additional quality assurance that equipment meets CenterPoint Energy minimum efficiency requirements.

CenterPoint Energy reserves the right to exclude trade allies from the On-Bill Loan Repayment program if it determines that the trade ally will not provide quality services to customers or comply with CenterPoint Energy administrative requirements.

Loan and Lender Eligibility

CenterPoint Energy will place the following limits on loans available through the On-Bill Loan Repayment program:

- The maximum principal loan amount may not exceed \$20,000 or the cost of eligible equipment or services, whichever is less; and
- The maximum loan term may not exceed ten years.

Customers will be permitted to take out multiple On-Bill Loan Repayment program loans, but the maximum outstanding balance of all On-Bill Loan Repayment loans may not exceed \$20,000.

To participate in CenterPoint Energy's On-Bill Loan Repayment program a lender must:

- Have a federal or state charter and be eligible for federal deposit insurance;
- Be a government entity that has authority to provide financial assistance for energy efficiency and renewable energy projects; or
- Be licensed, certified, or otherwise have its lending activities overseen by a state or federal government agency.^{14 15}

Lenders will be required by contract with CenterPoint Energy to comply with all applicable federal and state laws, rules, and regulations related to lending practices and consumer protection; to conform to reasonable and prudent lending standards; to provide loans on a non-discriminatory basis,¹⁶ and to adhere to all applicable program rules. Lenders will be required to work with CenterPoint Energy's implementation partner to exchange information necessary for operation of the online customer pre-approval portal, loan application and execution process, and loan repayment process via CenterPoint Energy bills.

CEE has indicated to CenterPoint Energy that, at program launch, it expects to offer amortizing loans requiring monthly payments. For loans of \$5,000 or less, the maximum term will be five years. For loans between \$5,000 and \$9,999, the maximum loan term will be seven years. For loans of \$10,000 or more, the maximum loan term will be ten years. CEE plans to charge a modest document preparation and credit report fee, which may be rolled into the loan financing package.

The Company is providing this information about CEE's proposed loan products for informational purposes only. CenterPoint Energy will allow lenders to offer any reasonable terms within the limits

¹⁴ See Minn. Stat. 216B.241, Subd. 5d(b).

¹⁵ CEE is described by the third bullet on this list, and otherwise meets the statutory criteria to be an On-Bill Loan Repayment program lender.

¹⁶ See Minn. Stat. 216B.241, Subd.5d(e).

specified above through the On-Bill Loan Repayment program and to change those terms or offer additional loan products with different terms at the lender’s discretion.

CenterPoint Energy reserves the right to exclude lenders and/or particular loan products from the On-Bill Loan Repayment program if it determines that doing so would be in the interests of consumer protection or minimizing administrative costs.¹⁷

Project Participation Goals and Evaluation Metrics

The Company proposes the following participation goals for the On-Bill Loan Repayment program:

	2019
Overall Participation Goal	500
Low-Income Participation Goal	8 ¹⁸
Renter Participation Goal	0 ¹⁹

For purposes of the On-Bill Loan Repayment program, each loan issued in a given year will count as one participant.

In addition to participation, the Company will track and report in its annual Status Reports how many and what types of natural gas efficiency measures and other equipment and services are purchased using On-Bill Loan Repayment program financing. The Company will also report how many customers, if any, are prevented from participating due to the Company’s customer eligibility criteria or because they are not matched with any available loan products. CenterPoint Energy will also track and report how many customers, if any, are removed from the On-Bill Loan Repayment program because they have fallen behind on their natural gas bills.

Budget Modification Request

The Company’s expectations for program timeline, as described in the Original Proposal, underestimated the amount of time that would be required for the Company to engage an implementation partner. When it filed the Original Proposal, the Company expected to complete most of the program design and technical integration work required in 2017. The delay in selecting and contracting with an implementation partner has pushed many of these activities into the 2018 CIP program year. As a result, the Company significantly underspent its 2017 On-Bill Loan Repayment program budget, but expects that the 2018 budget may be too low for the activities that must take place this year. In addition, the Company has a more accurate understanding of program costs now that it has

¹⁷ For example, although the Company expects lender underwriting criteria to appropriately determine loan terms and minimum monthly payments in most cases, CenterPoint Energy may prohibit lenders from offering loans that would result in monthly installments exceeding a certain amount.

¹⁸ CenterPoint Energy does not intend to target low-income customer participation in this program. However, it anticipates that some low-income customers will choose to participate in On-Bill Loan Repayment rather than one of the Company’s targeted Low-Income Segment programs. CenterPoint Energy’s low-income participation goal stated here is based on low-income participation the Company observes in other Residential Segment programs that do not target low-income customers.

¹⁹ The Company anticipates no rental customer participation in 2019 because CEE plans to offer loans only to owner-occupied properties at program launch.

contracted an implementation vendor and begun the technical integration process. In addition to implementation partner fees and Company CIP labor expenses, CenterPoint Energy may charge billing and/or customer service costs to Project Delivery for this program to the extent they are incremental to ordinary utility operating costs. The Company has also added a small budget for Advertising & Promotions, and removed the 2018 Evaluation budget.

The charts below show the original On-Bill Loan Repayment budget for this Triennial, actual 2017 spend, and the Company's proposed revisions to the 2018 and 2019 budgets:

Original Budget

	2017	2018	2019
Project Delivery	\$1,000,000	\$525,000	\$525,000
Utility Administration	\$75,000	\$75,000	\$75,000
Advertising & Promotions	\$0	\$0	\$0
Evaluation	\$25,000	\$25,000	\$25,000
Research	\$0	\$0	\$0
Incentives	\$0	\$0	\$0
Total Budget	\$1,100,000	\$625,000	\$625,000

2017 Actual Spend and Proposed Revised Budget for 2018 and 2019

	2017	2018	2019
Project Delivery	\$66,548	\$1,000,000	\$525,000
Utility Administration	\$58,513	\$75,000	\$75,000
Advertising & Promotions	\$0	\$5,000	\$25,000
Evaluation	\$0	\$0	\$25,000
Research	\$0	\$0	\$0
Incentives	\$0	\$0	\$0
Total Budget	\$125,061	\$1,080,000	\$650,000

Information Required by Minn. Rule 7690.0500, subp. 2

A. Description of the Proposed Program

Provided on pages 1-9 of this filing.

B. Project Information Sheets

Not applicable for indirect savings programs.

C. Effect on Peak Demand and Energy Consumption and List of Assumptions for Each Technology

Not applicable for indirect savings programs.

D. Relationship of Program to Integrated Resource Plan

Not applicable for natural gas utilities.

E. Cost-Effectiveness

Not applicable for indirect savings programs.

F. Low-Income and Renter Participation

Provided on page 8 above.

G. Budget

Provided on page 9 above.

H. Ratemaking Treatment & Cost Recovery Method

The ratemaking and cost-recovery procedures for this program are the same as those approved by the Minnesota Public Utilities Commission for the Company's CIP generally.

I. Participation

Provided on page 8 above.

J. Involvement of Community Energy Organizations

As stated in the Original Filing, community energy organizations (CEOs) have been vocal advocates for the On-Bill Loan Repayment program, and were instrumental in passing the enabling legislation in 2014. The Company appreciates the continued interest of CEOs and looks forward to their input on final program design and initial implementation. After program launch, the Company hopes that CEOs will continue to advocate for the On-Bill Loan Repayment offering, assist the Company in making customers aware of the offering, and, in some cases, participate in the program as lenders.

K. Evaluation Plan

Provided on page 8 above.

L. Renewable Energy Information

Not applicable.

M. Additional Information

None.

Conclusion

CenterPoint Energy appreciates the Deputy Commissioner's consideration of this proposal. Please feel free to contact me at (612) 321-4334 with any questions or concerns regarding this request.

Sincerely,

/s/

Erica R. Larson
Regulatory Analyst, Conservation Improvement Program

CC: CIP Service List

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
)
COUNTY OF HENNEPIN)

Ethan S. Warner, being first duly sworn on oath, deposes and says that he is an employee in the office of CenterPoint Energy, Minneapolis, Minnesota 55402, and that on the 3nd day of July 2018, he 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/ Ethan S. Warner
Ethan S. Warner

Subscribed and sworn to before me
this 3nd day of July.

 /s/ Melodee Sue Carlson Chang
Melodee Sue Carlson Chang
Notary Public (Commission Expires January 31, 2019)

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-119_G008.CIP-16-119
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Jill	Curran	jcurran@mnchamber.com	Minnesota Waste Wise	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_16-119_G008.CIP-16-119
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Melissa S	Feine	melissa.feine@semcac.org	SEMCAAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
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_16-119_G008.CIP-16-119
Angela E.	Gordon	angela.e.gordon@lmco.com	Lockheed Martin	1000 Clark Ave. St. Louis, MO 63102	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	OFF_SL_16-119_G008.CIP-16-119
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Stephan	Gunn	sgunn@appliedenergygroup.com	Applied Energy Group	1941 Pike Ln De Pere, WI 54115	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Tyler	Hamman	tylerh@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Norm	Harold	N/A	NKS Consulting	5591 E 180th St Prior Lake, MN 55372	Paper Service	No	OFF_SL_16-119_G008.CIP-16-119
Scott	Hautala	scotth@hpuc.com	Hibbing Public Utilities	1902 E 6th Ave Hibbing, MN 55746	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
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Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE Austin, MN 55912	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
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Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
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Cindy	Schweitzer Rott	cindy.schweitzer@clearesult.com	CLEARResult's	S12637A Merrilee Rd. Spring Green, WI 53588	Electronic Service	No	OFF_SL_16-119_G008.CIP-16-119
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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