



505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN 55459-0038

October 28, 2024

VIA eFILING

Dr. Pete Wyckoff
Deputy Commissioner, Division of Energy Resources
Minnesota Department of Commerce, Division of Energy Resources
85 7th Place East, Suite 280
St. Paul, MN 55101-2198

Re: In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan

Docket No. G-008/CIP-23-95

REPLY COMMENTS

Dear Deputy Commissioner Dr. Wyckoff:

CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas ("CenterPoint Energy" or the "Company") respectfully submits the following *Reply Comments* in response to *Comments* filed by the Minnesota Blue Flame Gas Association, Marsh Heating and Air Conditioning, Golden Valley Heating and Air, High Road Heating and Cooling, Heating and Cooling Two, the Minnesota Heating and Cooling Association, Fresh Energy, and Xcel Energy regarding the Company's October 1, 2024, *Program Modification Request*.^{1 2 3 4 5 6} CenterPoint

¹ See *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Minnesota Blue Flame Gas Association Letter (October 10, 2024).

² See *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Marsh Heating & Air Conditioning Letter (October 11, 2024).

³ See *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Comments from Heating & Cooling Two, Letters from High Road Heating & Cooling and Golden Valley Heating & Air (October 14, 2024).

⁴ See *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Minnesota Heating & Cooling Association Comments (October 15, 2024).

⁵ See *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Program Triennial Plan*, Docket No. G-008/CIP-23-95, Xcel Energy Comments (October 16, 2024).

⁶ See *In the Matter of CenterPoint Energy's 2024-2026 ECO Modification Request Filed October 1, 2024*, Docket No. G-008/CIP-23-95, Fresh Energy Comments (October 16, 2024).

Energy thanks the interested parties for their *Comments* and appreciates the opportunity to provide these *Reply Comments*.

Background

On October 1, 2024, CenterPoint Energy submitted a *Formal Program Modification Request* (“*Program Modification*”) to modify the heating equipment rebate levels in its Home Efficiency Rebates (“HER”) program.⁷ The *Program Modification* was filed in accordance with the Minnesota Department of Commerce, Division of Energy Resources (“Department”) Deputy Commissioner’s March 21, 2024, *Decision, In the Matter of CenterPoint Energy’s 2024-2026 ECO Triennial Plan Rebate Changes* and Minnesota Rules Part 7690.1440.⁸ ⁹ CenterPoint Energy sought Department approval for one of the following two proposals:

- *Revision A* is CenterPoint Energy’s preferred pathway. It largely reflects the Department’s *Decision* and the February 28 and 29, 2024, commenting parties’ recommended rebate levels for the HER program.¹⁰ ¹¹ *Revision A* deviates from the commenting parties’ recommendations by retaining the current \$1,000 rebate for a 97% AFUE furnace. The Company believes this rebate level is important for continuing to achieve the HER program’s energy savings goal and moving the market towards the highest efficiency furnaces.
- *Revision B* is the alternative pathway. It fully reflects the Department’s *Decision* and the February 28 and 29, 2024, commenting parties’ recommended rebate levels for the HER program, including the commenting parties’ preferred \$600 rebate for a 97% AFUE furnace.

On October 2, 2024, the Department filed a notice of completion with the following schedule:¹²

- *Comments*: Wednesday, October 16, 2024
- *Reply Comments*: Monday, October 28, 2024
- *Deputy Commissioner’s Decision*: Monday, December 2, 2024

By October 16, 2024, interested parties had filed *Comments* responding to CenterPoint Energy’s *Program Modification*. The Company appreciates the interested parties’ review of its proposed

⁷ See *In the Matter of CenterPoint Energy’s 2024-2026 Natural Gas Energy Conservation and Optimization Program Triennial Plan*, Docket No. G-008/CIP-23-95, CenterPoint Energy Program Modification Request (October 1, 2024).

⁸ See *In the Matter of CenterPoint Energy’s 2024-2026 ECO Triennial Plan Rebate Changes*, Docket No. G-008/CIP-23-95, DOC Decision, (March 21, 2024).

⁹ Minnesota Administrative Rules – 7690.1440 Timelines for Different Program Filings:
<https://www.revisor.mn.gov/rules/7690.1440/>

¹⁰ See *In the Matter of CenterPoint Energy’s 2024-2026 ECO Triennial Plan Rebate Changes*, Docket No. G-008/CIP-23-95, CEE Comments, (February 28, 2024).

¹¹ See *In the Matter of CenterPoint Energy’s 2024-2026 ECO Triennial Plan Rebate Changes*, Docket No. G-008/CIP-23-95, Comments from Fresh Energy, Cooperative Energy Futures, and the Cities of Minneapolis, Bloomington, St. Louis Park, and Edina, (February 29, 2024).

¹² See *In the Matter of CenterPoint Energy’s 2024-2026 ECO Modification Request Filed October 1, 2024*, Docket No. G-008/CIP-23-95, DOC Regulatory Filing Schedule, (October 2, 2024).

HER *Program Modification*. The Company thanks the Minnesota Heating and Cooling Association, the Minnesota Blue Flame Gas Association, Marsh Heating and Air Conditioning, Golden Valley Heating and Air, Heating and Cooling Two, and High Road Heating and Cooling for supporting CenterPoint Energy's preferred *Revision A*. CenterPoint Energy recognizes that the heating equipment dealers have taken time away from operating their businesses to participate in the regulatory process, and that this has been a new experience for most if not all of them. The Company values the unique perspective they lend to this conversation.

The Company also appreciates Xcel Energy's *Comments*, which explain how its Geographic Consistency Policy is implemented in communities that both companies serve.

CenterPoint Energy also thanks Fresh Energy for its *Comments*. However, the Company disagrees with Fresh Energy's recommendations and continues to support *Revision A*.

In the following section, CenterPoint Energy addresses Fresh Energy's *Comments*, responds to a request from Xcel Energy, and highlights concerns raised by the trade allies in their comments.

Fresh Energy's Concerns Regarding Meeting the Department's Decision Requirements, Misalignment of Utility Furnace Rebate Levels, and Prudent Use of Ratepayer Funds

In its *Comments*, Fresh Energy raised "concerns with CenterPoint's proposed Revision A, which does not meet the requirements of the Deputy Commissioner's March 21, 2024 Decision, lacks alignment with Xcel's furnace rebate offerings, and is not a prudent use of ratepayer dollars." Fresh Energy also wrote that it is "concerned that CenterPoint's proposed \$1,000 rebate for the 97% AFUE furnace in Revision A will only further misalign CenterPoint's rebates with Xcel's. Xcel currently only offers a \$400 rebate for a 97% AFUE furnace. It is important to align rebate opportunities for customers across utility service territories."¹³

CenterPoint Energy appreciates Fresh Energy's *Comments*. However, Fresh Energy does not elaborate on why CenterPoint Energy should align its 97% AFUE furnace rebate with Xcel Energy's lower amount. The Company is also skeptical that aligning utility rebates alone has inherent value, especially without market data supporting this approach. CenterPoint Energy's *Program Modification* explains the reasons behind its market-based approach to the \$1,000 rebate level.¹⁴

¹³ See *In the Matter of CenterPoint Energy's 2024-2026 ECO Modification Request Filed October 1, 2024*, Docket No. G-008/CIP-23-95, Fresh Energy Comments, p. 3 (October 16, 2024).

¹⁴ See *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Program Triennial Plan*, Docket No. G-008/CIP-23-95, CenterPoint Energy Program Modification Request, p. 5 (October 1, 2024). For example, CenterPoint Energy's data shows that its \$1,000 rebate for a 97% AFUE furnace is driving a dramatic increase in installations. From January through July 2024, 97%+ AFUE furnace rebates were 40 percent of furnace rebates in the HER program. By contrast, just 15 percent of furnace rebates issued by the HER program were for 97%+ AFUE furnaces during the same months in 2023. Additionally, 213 dealers submitted customer rebates for 97%+ AFUE furnaces from January to July 2024. This is a 43% increase over the same period in 2023.

Additionally, Fresh Energy stated that CenterPoint Energy's \$1,000 97% AFUE furnace rebate "goes against the energy optimization component of ECO as these rebate allocations are not optimized for energy savings to the benefit of ratepayers. This rebate schedule is more in line with a rebate aimed at redirecting long-term investment in gas appliances than in effective energy conservation measures."¹⁵ Fresh Energy does not demonstrate that the \$1,000 rebate is inconsistent with statute or regulatory guidance or with optimal program or portfolio design. It is also unclear how Fresh Energy is applying the optimization standard to its own recommendations (i.e., that the Department approve *Revision B*).

CenterPoint Energy would also like to highlight concerns raised by the trade allies in their comments related to Fresh Energy's recommendation that the Department approve *Revision B*. Trade allies work directly with CenterPoint Energy customers and can attest to the importance of CenterPoint Energy rebates in motivating customers to install efficient heating equipment to lower gas usage and customer bills.

- Heating and Cooling Two wrote, "With inflation on the rise, the additional costs associated with the EPA's new mandates, increased interest rates, and a shortage of skilled field workers, the price of HVAC systems is already climbing. Reducing rebates, especially for those who need them most, will force families into difficult decisions that previous customers did not have to face."¹⁶
- Golden Valley Heating and Air wrote, "Please also consider making no changes for the 2025 year on all 92%, 96% and 97% rebates."¹⁷
- Marsh Heating and Air Conditioning wrote, "We greatly appreciate the \$1,000 gas rebate offered by CenterPoint. It helps us try to sell high efficiency furnaces if a customer is on the fence about whether they want to stay with an 80% efficient furnace or upgrade to a 97% or 98% efficient furnace."¹⁸
- The Minnesota Heating and Cooling Association wrote, "Rebate programs provide significant financial savings for our customers and encourages the adoption of energy-efficient technologies. For that reason, our members have asked us to support

¹⁵ See *In the Matter of CenterPoint Energy's 2024-2026 ECO Modification Request Filed October 1, 2024*, Docket No. G-008/CIP-23-95, Fresh Energy Comments, p. 4 (October 16, 2024).

¹⁶ See *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Heating & Cooling Two Comments (October 14, 2024).

¹⁷ See *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Golden Valley Heating & Air Comments (October 14, 2024).

¹⁸ See *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Marsh Heating & Air Conditioning Letter (October 11, 2024).

CenterPoint Energy's proposed program modification recommending a \$1,000 rebate for all 97% AFUE furnace installations."^{19 20}

The Company believes the trade allies' comments speak to Fresh Energy's concerns regarding the importance of the \$1,000 97% AFUE furnace rebate for achieving energy efficiency goals and the appropriateness of the \$1,000 rebate to encourage higher levels of energy efficiency.

Minnesota Blue Flame Gas Association's Concerns with Reducing Rebate Levels Mid-Triennial

CenterPoint Energy also wishes to highlight a concern raised by the Minnesota Blue Flame Gas Association in its *Comments*. The Minnesota Blue Flame Gas Association wrote, "reducing the [\$1,000 97% AFUE furnace] rebate level in the middle of the [ECO] Plan's three-year cycle is problematic for many of our members. Members have quoted rebate amounts to potential customers and then switching/reducing the level of rebate mid-cycle could have a damaging impact on current and potential customers." The Company expressed the same concern in its *Program Modification*.²¹ Lowering rebate amounts mid-triennial entails risks, including dealer and customer confusion and complaints as well as long-term harm to the HER program's ability to achieve its filed goals.

Xcel Energy's Request for Additional Information Regarding CenterPoint Energy's Air Source Heat Pump Offerings

In its *Comments*, Xcel Energy asked if "CenterPoint Energy could provide, in Reply, any other information about circumstances in which it does not provide incentives for ASHP systems, this would likely help customers, the trade, and stakeholders better understand the scope and impact of the proposed changes."²² Currently, in CenterPoint Energy's residential and low-income programs, the Company offers incentives for minimum 7.8 HSPF2 ducted air source heat pumps installed with high-efficiency gas furnaces (at least 92% AFUE) with switchover temperatures of less than or equal to 40 degrees Fahrenheit.²³ Full eligibility requirements can be found on

¹⁹ See *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, Minnesota Heating & Cooling Association Comments (October 15, 2024).

²⁰ There are 44 heating company and equipment distributor members of the Minnesota Heating and Cooling Association.

²¹ See *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Program Triennial Plan*, Docket No. G-008/CIP-23-95, CenterPoint Energy Program Modification Request, pp. 7 and 8 (October 1, 2024).

²² See *In the Matter of CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Program Triennial Plan*, Docket No. G-008/CIP-23-95, Xcel Energy Comments, p. 2 (October 16, 2024).

²³ When a customer installs a standalone ASHP, CenterPoint Energy expects the existing furnace to have an AFUE rating of 92 percent or higher (the minimum efficiency rating for a furnace to be rebate-eligible in the HER program). However, this is not a requirement to receive a rebate for a standalone ASHP. Instead, the Company will consider cases where a customer's furnace AFUE rating falls below 92% and determine rebate eligibility on a case-by-case basis in consultation with the DOC.

CenterPoint Energy's website.²⁴ The Company will share its assessments of potential future heat pump rebate offerings, including cold climate air source heat pumps, heat pump water heaters, and ductless air source heat pumps, in its 2024 ECO status report and consider program modifications for 2026.²⁵

Conclusion

In closing, CenterPoint Energy appreciates the interested parties' *Comments* on the Company's *Program Modification*. If Fresh Energy or other interested parties have further questions or concerns, CenterPoint Energy is happy to continue the discussion as the Company considers program modifications or begins its 2027-2029 Triennial Planning process in 2025.

CenterPoint Energy continues to believe that its *Revision A*, which retains the Company's \$1,000 rebate for a 97% AFUE furnace, is in the best interests of customers, especially customers installing hybrid heating systems. This proposal also enjoys support from the Company's trade allies, as evidenced by the comments filed. As the trade allies have argued, CenterPoint Energy's \$1,000 rebate is especially important in light of rising costs and the need for sufficiently high rebates to motivate customers to install highly efficient furnaces. The Company, like the trade allies, also wishes to avoid customer confusion and dissatisfaction as a result of changing rebate levels mid-triennial. CenterPoint Energy thanks the trade allies for supporting its *Revision A* and for their advocacy on behalf of our customers.

The Company is grateful for the opportunity to provide *Reply Comments* and thanks the Department for its consideration.

If you have questions, please contact me at martin.kapsch@centerpointenergy.com or 612-321-4606.

Sincerely,

/s/ Martin A. Kapsch

Senior Regulatory Analyst, Energy Conservation and Optimization Programs

C: Service List

²⁴ CenterPoint Energy's Ducted Air Source Heat Pump Rebate - <https://www.centerpointenergy.com/en-us/SaveEnergyandMoney/Pages/Residential-Ducted-Air-Source-Heat-Pump-Rebate.aspx?sa=mn&au=res>

²⁵ See *In the Matter of CenterPoint Energy's 2024-2026 Energy Conservation and Optimization Triennial Plan*, Docket No. G-008/CIP-23-95, DOC Decision, p. 280 (December 1, 2023).

In the Matter of CenterPoint Energy's Natural Gas 2024-2026 ECO Triennial Plan	Docket No. G-008/CIP-23-95
October 28, 2024	REPLY COMMENTS

CERTIFICATE OF SERVICE

I, Marty A. Kapsch, served the attached *Reply Comments* of CenterPoint Energy on the attached service list for Docket No. G-008/CIP-23-95 by electronic service.

/s/ Martin A. Kapsch

Senior Regulatory Analyst, Energy Conservation and Optimization Programs
CenterPoint Energy

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
JEFFREY	BEIRIGER	info@mhca.info	Minnesota Heating & Cooling Association	5625 Xerxes Ave N, Suite C Box # 167 Brooklyn Center, MN 55430	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Anjali	Bains	bains@fresh-energy.org	Fresh Energy	408 Saint Peter Ste 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_23-95_CIP-23-95
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_23-95_CIP-23-95
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_23-95_CIP-23-95
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_23-95_CIP-23-95
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_23-95_CIP-23-95
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_23-95_CIP-23-95

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Chris	Duffrin	cduffrin@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_23-95_CIP-23-95
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_23-95_CIP-23-95
Karolanne	Foley	Karolanne.foley@dairylandpower.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Tyler	Glewwe	Tyler.Glewwe@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_23-95_CIP-23-95

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Jeffrey	Haase	jhaase@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas	N/A	Electronic Service	No	OFF_SL_23-95_CIP-23-95

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission	1902 6th Ave E Hibbing, MN 55746	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	OFF_SL_23-95_CIP-23-95
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-95_CIP-23-95
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_23-95_CIP-23-95
Mari	Ojeda	ojeda@fresh-energy.org	Fresh Energy	408 St Peter St Ste 350 Saint. Paul, MN 55102	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-95_CIP-23-95

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_23-95_CIP-23-95
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_23-95_CIP-23-95
Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_23-95_CIP-23-95
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_23-95_CIP-23-95
Rick	Sisk	RSisk@trccompanies.com	Lockheed Martin	1000 Clark Ave. St. Louis, MO 63102	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_23-95_CIP-23-95

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-95_CIP-23-95
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_23-95_CIP-23-95

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	SPL_SL__CIP SPECIAL SERVICE LIST
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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	No	SPL_SL__CIP SPECIAL SERVICE LIST
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jim	Erchul	jerschul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Karolanne	Foley	Karolanne.foley@dairylandpower.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tyler	Glewwe	Tyler.Glewwe@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jeffrey	Haase	jhaase@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas	N/A	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission	1902 6th Ave E Hibbing, MN 55746	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Rick	Sisk	RSisk@trccompanies.com	Lockheed Martin	1000 Clark Ave. St. Louis, MO 63102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST