



February 28, 2024

Anthony Fryer
Director, Energy Conservation and Optimization
Minnesota Department of Commerce, Division of Energy Resources
85 7th Place East, Suite 500
St. Paul, MN 55101

RE: Center for Energy and Environment's Comments on CenterPoint Energy's Energy Conservation and Optimization Rebate Changes

Docket Number G008/CIP-23-95

Dear Mr. Fryer,

Center for Energy and Environment ("CEE") respectfully submits these Comments to the Minnesota Department of Commerce, Division of Energy Resources ("Department") in response to the Department's letter inviting stakeholder comments on CenterPoint Energy's furnace and air source heat pump rebates in their recently finalized 2024-2026 Energy Conservation and Optimization ("ECO") Triennial Plan ("Letter").

In response to stakeholder comments in the 2024-2026 ECO Triennial Plan regulatory review process, Department Staff recommended that CenterPoint Energy (or "Company") increase proposed air source heat pump rebate levels so that they are more in alignment with Xcel Energy's.¹ In response to Staff's recommendation, the Company proposed changes to its air source heat pump and natural gas furnace rebates in its November 6, 2023 Reply Comments to Staff's Proposed Decision.

CEE very much appreciates the Department's recommendation for the Company to update its electric air source heat pump ("ASHp") rebate to match that offered by Xcel Energy for the 2024-2026 ECO triennium. We believe this recommendation will create more equality between Minnesota customers served by different natural gas utilities, reduce customer and contractor

¹ Page 149 of Staff's October 23, 2024 Proposed Decision in this docket.

confusion, support implementation of the Inflation Reduction Act Home Energy Rebates programs, and accelerate adoption of ASHPs in CenterPoint Energy’s service territory.

However, we do not believe that CenterPoint Energy’s proposed changes in response to the Department’s recommendation,² or its recently filed response to the Department’s Letter,³ adequately address the Department’s recommendation. Rather, the Company’s proposed changes substantially increase natural gas furnace incentives, while CenterPoint Energy’s newly proposed ASHP incentive remains well below that offered by Xcel Energy. We recommend the Department require CenterPoint Energy to revert to its originally filed gas furnace rebates⁴ and increase its rebate for the installation of an ASHP to match the \$1,100 provided by Xcel Energy for the heating-only component of its ASHP rebate.⁵

Air Source Heat Pump Rebate Levels

In our August 16, 2023 Comments in this docket, CEE stated:

We recommend that CenterPoint Energy provide incentives for entry-level [air source heat pumps]...For this tier of heat pump incentives, we recommend aligning equipment specifications with either the Federal Minimum Standard for heat pumps or ENERGY STAR (non-cold climate) without the EER2 requirement and **providing a \$1,600 rebate, in keeping with Xcel Energy’s proposed lowest tier rebate** for air source heat pumps.⁶ [emphasis added]

During the August 16, 2023 initial comment period in the same docket, Fresh Energy, the Citizens’ Utility Board, Minnesota Energy Efficiency for All, and West Metro Local Governments also submitted comments recommending that CenterPoint Energy align its ASHP rebates with those proposed by Xcel Energy. In reply comments, Community Power echoed the same recommendation.

In its response to parties, CenterPoint Energy stated, “If recommended by the [Department] to increase its ASHP rebate levels to be more in alignment with Xcel Energy then the Company can

² CenterPoint Energy’s November 6, 2023 Comments to the Proposed Decision filed by the Department of Commerce on October 23, 2023 in Docket Number G008/CIP-23-92.

³ CenterPoint Energy’s February 19, 2024 Comments in Docket Number G008/CIP-23-92.

⁴ CenterPoint Energy’s June 30, 2023 ECO Plan filing in this docket.

⁵ P. 268 of Xcel Energy’s initially filed 2024-2026 ECO Triennial Plan Technical Assumptions (“Part 2 of 3”), “Cooling Portion of Quality Installation of High Efficiency Residential Air Source Heat Pump” under the Residential HVAC-MN measure, filed June 29, 2024 in Docket Number G008/CIP-23-92.

⁶ P. 5 of CEE’s August 16, 2023 initial comments in Docket Number G008/CIP-23-95.

propose these changes in response to an [information request] or in Comments on the [Department’s] *Proposed Decision*.”⁷

In its Proposed Decision, the Department stated:

Improving Air Source Heat Pump Rebate Alignment: Staff recommend that [CenterPoint Energy] increase its proposed air source heat pump rebate levels so that they are more in alignment with Xcel Energy’s. Staff believe that alignment of air source heat pump rebates is important in terms of overall customer experience and ensuring that customers will receive a similar rebate level regardless of whether they are an Xcel Energy or [CenterPoint Energy] customer. As part of the Company’s comments on this Proposed Decision, Staff recommend that [CenterPoint Energy] propose changes to its air source heat pump levels.⁸

As illustrated in Table 1, CenterPoint Energy proposed an adjustment to its heat pump rebate offering in response to Staff’s Proposed Decision. However, this proposed change did not create alignment with Xcel Energy’s rebates as recommended by the Department. CenterPoint Energy proposed an incentive of \$500 (up from the originally proposed \$400 rebate) for ASHPs, while Xcel Energy offers a total of \$1,600 for its lowest tier rebate for ASHPs, which includes \$1,100 for heating savings and \$500 for cooling savings.⁹ CenterPoint Energy’s updated proposed rebate for ASHPs remains less than half that offered by Xcel Energy for the heating savings associated with an ASHP.

Table 1. Comparison of proposed 2024-2026 ECO Triennial ASHP rebate levels.

Measure	Xcel Energy Rebate ¹⁰	CenterPoint Rebate, Proposed ¹¹	CenterPoint Rebate, Revised ¹²
ASHP	\$1,600	\$400	\$500

CenterPoint Energy included “bundled” rebates for ASHPs paired with new gas furnaces. The bundled rebate amounts represent the \$500 ASHP rebate, plus the dollar amount that

⁷ P. 12 of the Company’s September 1, 2023 Reply Comments in Docket Number G008/CIP-23-95.

⁸ P. 149 of the Department’s October 23, 2023 Proposed Decision in Docket Number G008/CIP-23-95.

⁹ Page 286, Part 2 of Xcel Energy’s January 29, 2024, 2024-2026 ECO Triennial Plan in Docket Number G002/CIP-23-92.

¹⁰ P. 94 of Xcel Energy’s initial filing in Docket Number G008/CIP-23-92.

¹¹ Pp. 47 and 84 of CenterPoint Energy’s June 30, 2023 initial filing in Docket Number G008/CIP-23-95.

¹² P. 8 of CenterPoint Energy’s November 6, 2023 Comments to the Proposed Decision and p. 80 of CenterPoint Energy’s June 30, 2023 initial filing in Docket Number G008/CIP-23-95.

corresponds to the Company's proposed furnace rebates. We note that Xcel Energy customers could also pair an ASHP rebate with a standalone furnace rebate. This creates further misalignment between the two utilities' rebate offerings.

In addition to proposing a small modification to its ASHP rebates, CenterPoint also made significant updates to its natural gas furnace rebate offerings. It is our understanding that the Company's proposed changes to its gas furnace rebates would pertain to customers installing a standalone gas furnace, and not installing an ASHP. The Company's proposed increases to furnace rebates increased the value of "bundled" ASHP-plus-furnace rebate amounts, creating the perception of greater alignment with Xcel Energy's incentives. However, given that the Department's recommendation in the Proposed Decision only addressed ASHP rebates, and that ASHPs can be installed with an existing furnace, there is no clear reason that the Company would increase rebates for gas furnaces paired with ASHPs. Moreover, there is no information in the record of this docket to explain or support the need for increasing standalone gas furnace rebates.

CEE recommends that the Department require CenterPoint Energy to provide an \$1,100 rebate for residential ASHP installations that meet the Company's approved ASHP specifications, paired with a gas furnace (regardless of whether the ASHP is paired with a *new* furnace). We recommend that this rebate be provided for existing homes as well as new construction. CEE also continues to encourage the Company to provide a \$1,500 rebate for cold climate ASHPs, equivalent to the heating portion of Xcel Energy's cold climate ASHP rebate.

Furnace Rebate Levels

CenterPoint Energy did not provide an explanation or justification for increasing furnace rebate levels in this docket. CEE is concerned that increased furnace rebates are not a prudent use of ratepayer dollars, given that the Company's furnace rebate programs have been successful in meeting the Company's approved participation and energy savings goals in recent years, while offering far lower gas furnace rebates. Table 2 compares CenterPoint Energy's participation goals and its achievements for high-efficiency gas furnace rebates for the prior triennium.¹³

¹³ Data for the 2023 program year is not yet available.

Table 2. CenterPoint Energy’s residential gas furnace rebate participation.

Furnace Measure	2021 Goal ¹⁴	2021 Achieved ¹⁵	2022 Goal ¹⁶	2022 Achieved ¹⁷
Existing home, 92% AFUE	300	362	300	293
Existing home, 94% AFUE	1,200	850	1,200	707
Existing home, 96% AFUE	13,000	14,771	13,375	14,913
New home, 92% AFUE	200	184	200	285
New home, 95% AFUE	400	265	450	227

The goal of rebates in ECO is to shift customers toward more efficient equipment and appliances, and it appears to CEE that the rebate levels provided in the prior triennium proved sufficient to drive customer adoption of efficient gas furnaces. According to CenterPoint Energy’s 2022 ECO Status Report, and as illustrated in Table 2, the Company’s Home Efficiency rebate program “Achieved 102% of its participation goal and 103% of its energy savings goal while program spending was 101% of budget.”¹⁸

Table 3 outlines rebate levels from CenterPoint Energy’s 2021-2023 ECO Triennial, as well as the range of rebate levels the Company has proposed for gas furnaces for the 2024-2026 ECO triennium.

¹⁴ Pp. 32 and 61 of CenterPoint Energy’s 2021-2023 CIP Triennial Plan filed January 20, 2021 in Docket Number G008/CIP-20-478.

¹⁵ Pp. A-9 and A-10 of CenterPoint Energy’s 2021 CIP Status Report filed May 2, 2022 in Docket Number G008/CIP-20-478.

¹⁶ Pp. 32 and 61 of CenterPoint Energy’s 2021-2023 CIP Triennial Plan filed January 20, 2021 in Docket Number G008/CIP-20-478.

¹⁷ Pp. A-9 and A-10 of CenterPoint Energy’s 2022 CIP Status Report filed May 1, 2023 in Docket Number G008/CIP-20-478.

¹⁸ P. 30 of CenterPoint Energy’s 2022 CIP Status Report filed May 1, 2023 in Docket Number G008/CIP-20-478.

Table 3. Comparison of CenterPoint Energy’s residential gas furnace rebate levels over time.

Furnace Measure	2021-2023 Rebate ¹⁹	Originally Proposed, 2024-2026 Rebate ²⁰	Updated, 2024-2026 Rebate ²¹
Existing home, 92% AFUE	\$150	\$200	\$500
Existing home, 94% AFUE	\$300		
Existing home, 96% AFUE	\$400	\$400	\$750
Existing home, 97% AFUE		\$600	\$1000
New home, 92% AFUE	\$50	\$50	\$50
New home, 95% AFUE	\$350		
New home, 96% AFUE		\$200	\$200
New home, 97% AFUE		\$400	\$400

CenterPoint Energy has proposed a doubling of customer incentives for retrofit gas furnaces compared to the previous triennium, without providing evidence that higher rebate levels are warranted.

Table 4 compares the gas furnace rebates provided by the different Minnesota investor-owned gas utilities for the 2024-2026 ECO triennium, showing that CenterPoint Energy’s originally proposed gas furnaces rebates were already among the highest in the state. The Company’s updated proposed furnace rebates would approximately double the rebate amount provided by other Minnesota gas utilities for the 2024-2026 ECO triennium. We also note that Xcel Energy only provides high-efficiency gas furnace rebates for models at 95% AFUE and higher, and we encourage CenterPoint Energy to consider a similar structure.

¹⁹ Pp. 30 and 61 of CenterPoint Energy’s 2021-2023 CIP Triennial Plan filed January 20, 2021 in Docket Number G008/CIP-20-478.

²⁰ P. 8 of CenterPoint Energy’s November 6, 2023 Comments to the Proposed Decision and p. 80 of CenterPoint Energy’s June 30, 2023 initial filing in Docket Number G008/CIP-23-95.

²¹ P. 8 of CenterPoint Energy’s November 6, 2023 Comments to the Proposed Decision and p. 80 of CenterPoint Energy’s June 30, 2023 initial filing in Docket Number G008/CIP-23-95.

Table 4. Comparison of utility rebates for residential gas furnaces for the 2024-2026 ECO triennium.

Furnace Measure	Xcel Rebate ²²	CenterPoint Rebate (proposed / updated) ²³	MERC Rebate ²⁴	Greater Minnesota Gas Rebate ²⁵	Great Plains Rebate ²⁶
Existing home, 92% AFUE	N/A	\$200 / \$500	\$200	N/A	N/A
Existing home, 94-95% AFUE	\$200		\$350	\$200	\$300
Existing home, 96% AFUE	\$300	\$400 / \$750		\$400	\$400
Existing home, 97% AFUE	\$400	\$600 / \$1000	\$500	\$400	
New home, 92% AFUE	N/A	\$50	N/A	N/A	N/A
New home, 94-95% AFUE	\$100		\$200	\$100	\$300
New home, 96% AFUE	\$150	\$200			\$400
New home, 97% AFUE	\$200	\$400	\$300	\$100	

Given the information discussed above, CEE recommends that the Department require CenterPoint Energy to offer residential gas furnace rebates equal to those initially proposed in its June 30, 2023 2024-2026 ECO Triennial Plan filing for the 2024-2026 ECO triennium.

Stakeholder Process

In August 16, 2023 Comments to this docket, Fresh Energy recommended a stakeholder process to discuss energy efficiency rebates for natural gas equipment.²⁷ The Department determined:

The Deputy Commissioner appreciates Fresh Energy’s suggestion to convene a stakeholder group to discuss a more focused effort on building decarbonization in future triennials. The Deputy

²² P. 94 of Xcel Energy’s June 29, initial filing in Docket Number G008/CIP-23-92.

²³ P. 8 of CenterPoint Energy’s November 6, 2023 Comments to the Proposed Decision in Docket Number G008/CIP-23-95.

²⁴ Pp. 67 and 80 of Minnesota Energy Resources Corporation’s June 30, 2023 filing in Docket Number G008/CIP-23-98.

²⁵ P. 17 of Greater Minnesota Gas’s June 30, 2023 initial filing in Docket Number G008/CIP-23-96.

²⁶ P. 13 of Great Plains Natural Gas Company’s initial filing in Docket Number G008/CIP-23-97.

²⁷ P. 14 of Fresh Energy’s August 16, 2023 Comments in Docket Number G008/CIP-23-95.

Commissioner also acknowledges that approval of utility efficiency programs through the ECO framework is evaluated based on a demonstration of program and segment cost-effectiveness and Fresh Energy's suggestion would represent a significant departure from this approach. Therefore, the Deputy Commissioner instructs Staff to convene a broader stakeholder process in 2024 to evaluate where prioritizing incentives or dual incentives might have the greatest benefits to ratepayers across multiple sectors, including discussion of potential decarbonization, efficiency, cost, and ratepayer impacts.²⁸

CEE appreciates the Department initiating a stakeholder process to discuss how to prioritize, target, and, potentially, layer ECO incentives to maximize benefits to customers and the energy system. We expect to have a robust conversation about incentives for HVAC equipment and how Minnesota utilities should design incentives in light of new, efficient technologies, state policy changes, and current market conditions. CenterPoint Energy could provide further information and discussion of possible changes to its rebate structure through this process.

We look forward to participating in the stakeholder process on incentive structures later this year.

Conclusion

CEE recommends that the Department require CenterPoint Energy to provide an \$1,100 rebate for residential ASHP installations that meet the Company's approved ASHP specifications, paired with a gas furnace (regardless of whether the ASHP is paired with a *new* gas furnace). We recommend that the ASHP rebate be provided for existing homes as well as new construction. Further, CEE recommends that the Department require CenterPoint Energy to offer residential gas furnace rebates equal to those initially proposed in the Company's June 30, 2023 2024-2026 ECO Triennial Plan filing in this docket for the 2024-2026 ECO triennium.

Our recommended changes to CenterPoint Energy's incentive structure are outlined below in Table 5.

²⁸ P. 249 of the Department's Decision, filed December 1, 2023, in Docket Number G008/CIP-23-95.

Table 5. CEE’s recommended rebate levels for residential HVAC equipment for CenterPoint Energy’s 2024-2026 ECO Triennial.²⁹

Retrofit Measure	Recommended Rebate
Gas Furnace, 92% AFUE	\$200
Gas Furnace, 96% AFUE	\$400
Gas Furnace, 97% AFUE	\$600
ASHP only	\$1,100
ASHP + 92% AFUE Gas Furnace	\$1,300
ASHP + 96% AFUE Gas Furnace	\$1,500
ASHP + 97% AFUE Gas Furnace	\$1,700
New Construction Measure	Recommended Rebate
New home, Gas Furnace 92% AFUE	\$50
New home, Gas Furnace 96% AFUE	\$200
New home, Gas Furnace 97% AFUE	\$400
ASHP only	\$1,100
ASHP + 92% AFUE Gas Furnace	\$1,050
ASHP + 96% AFUE Gas Furnace	\$1,300
ASHP + 97% AFUE Gas Furnace	\$1,500

We thank the Department for considering these Comments. Please contact me at apartridge@mncee.org with any questions.

Sincerely,

/s/ Audrey Partridge

Director of Policy

Center for Energy and Environment

²⁹ For clarity, CEE has included “bundled” rebate offerings for customers installing an ASHP with a new gas furnace. These bundles represent our recommended ASHP rebate of \$1,100 along with our recommended rebate for the corresponding furnace measure.

AFFIDAVIT OF SERVICE

DOCKET NUMBER G-008/CIP-23-95

I, Sachiko Graber, hereby certify that on this 28th day of February 2024, I served Center for Energy and Environment's Comments on CenterPoint Energy's 2024-2026 Natural Gas Energy Conservation and Optimization Triennial Plan in Docket Numbers G-008/CIP-23-95 on the following persons on the attached Service Lists by:

X placing such filing in envelopes, properly addressed, and depositing the same in the Post Office at the City of Minneapolis, for delivery by the United States Post Office as directed by said envelopes.

X electronic filing

/s/ Sachiko Graber

Sachiko Graber

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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
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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

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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
Rob	Friend	rfriend@mnchamber.com	Minnesota Chamber of Commerce - MN Waste Wise Foundation	400 Robert St N Ste 1500 Saint Paul, MN 55101	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@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

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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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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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
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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

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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@bepec.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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
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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

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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