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July 8, 2025

VIA ELECTRONIC FILING

Mike Bull
Deputy Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

Re: In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals

Docket No. G999/CI-21-565

Initial Comments of Minnesota Energy Resources Corporation

Dear Mr. Bull:

On May 5, 2025, the Minnesota Public Utilities Commission (“Commission”) issued a Notice of Comment Period requesting comments be filed in the above-referenced docket on the following:

Issue: What action(s), if any, should the Commission take to modify existing gas line extension policies for rate regulated gas utilities?

Topic(s) Open for Comment:

1. Should the Commission consider any modifications to how gas utilities calculate free footage allowance and other costs related to gas main and service line extensions? If so, what factors or conditions would justify changes? And how would any proposed changes affect new connecting customers and other ratepayers?
2. If the Commission should make modifications to regulated gas utilities’ gas line extension policies, how would rules, statutes, and Commission orders justify those modifications?

3. Which proposed modifications, if any, would necessitate gas utilities to coordinate and/or consult with electric utilities in the service territory where a gas line extension is being contemplated?
4. How should the Commission consider the results of Minnesota Energy Resources Corporation's Line Extension Policy Study¹ in this matter?
5. What lessons should the Commission consider from proceedings in other states related to this matter?
6. Should any distinctions be made between different customer classes when considering modifications?
7. How should the Commission consider the needs of low-income customers and other areas of equity in this matter?
8. Are there other issues or concerns related to this matter?

Minnesota Energy Resources Corporation ("MERC" or "Company") submits these Comments in response to the above issue and topics in the Commission's May 5, 2025 Notice.

Topic #1: Should the Commission consider any modifications to how gas utilities calculate free footage allowance and other costs related to gas main and service line extensions? If so, what factors or conditions would justify changes? And how would any proposed changes affect new connecting customers and other ratepayers?

As detailed in the Line Extension Policy ("LEP") Study ("LEP Study") filed by MERC on November 14, 2024 in Docket No. G011/GR-22-504², the Company does not believe a modification to its existing LEP, Customer Extension Model ("CEM"), or 75-foot service line allowance³ is warranted.

As stated in the LEP Study, MERC's 75-foot allowance for new residential service line extensions is based off the historical average length of new residential service line extensions within MERC's service territory. There are two other natural gas utilities in the Minnesota that have a 75-foot service line allowance in their LEP: CenterPoint

¹ Docket No. G011/GR-22-504, *In the Matter of the Application of Minnesota Energy Resources Corporation for Authority to Increase Natural Gas Rates in Minnesota*, Compliance Filing (November 14, 2024).

² Docket No. G011/GR-22-504, *In the Matter of the Application of Minnesota Energy Resources Corporation for Authority to Increase Natural Gas Rates in Minnesota*, Compliance Filing (November 14, 2024).

³ MERC's 75-foot service allowance is only applicable to new residential service line extensions. New commercial service line extensions do not receive a service line footage allowance under MERC's current LEP.

Energy⁴ and Xcel Energy⁵. MERC's 75-foot allowance is modest in relation to what other natural gas utilities in Minnesota allow for two reasons: 1) as compared to CenterPoint Energy and Xcel Energy, MERC has a very diverse service territory, much of it being rural, and 2) the remaining natural gas utilities in Minnesota, Great Plains Natural Gas and Greater Minnesota Gas, that also have service territories that are typically in more rural areas, have footage allowances of 100 feet⁶ and 125 feet⁷, respectively. That being said, MERC is unsure of how other natural gas utilities compute their footage allowances contained within their LEPs, and notes that capital investment and costs related to new gas main and service line extensions are consistently and comprehensively reviewed by the Commission in each utility's general rate case filings.

As can be seen from the differences in natural gas utilities' LEP and footage allowances, the Commission has historically looked at each natural gas utility individually, rather than taking a "one-size-fits-all" approach. Looking at each natural gas utility individually is appropriate, given the vastly different service territories of each utility, and the differing circumstances required to provide service to the varying customer classes, such as urban, rural, agricultural, or industrial, that comes with that service territory diversity. For example, as shown in Map 1 below, MERC's service territory is very different from Xcel Energy's. Xcel Energy's service territory is located mainly in the southern part of the State and contains many urban areas. MERC's service territory, as compared to Xcel Energy, is highly dispersed throughout the State, containing some urban areas but a substantial portion of rural territory.

⁴ Centerpoint Energy, Gas Rate Book, Section VI, Third Revised Page 12, effective June 1, 2021.

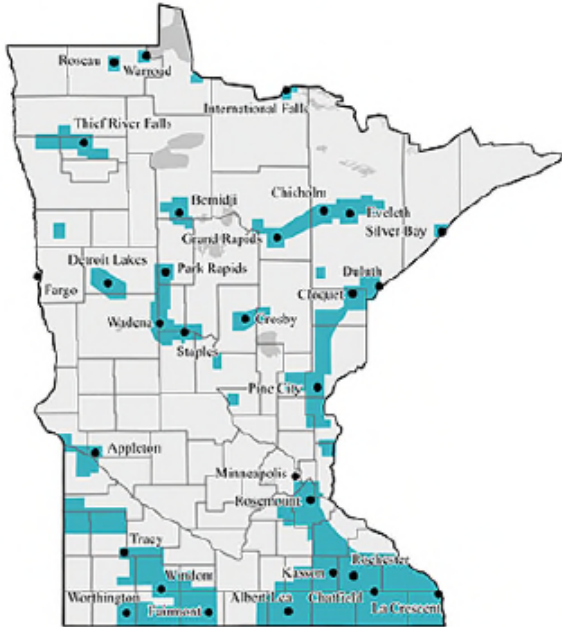
⁵ Northern States Power Company, Minnesota Gas Rate Book – MPUC No. 2, Section 6, 3rd Revised Sheet No. 18.1, effective May 1, 2011.

⁶ Great Plains Natural Gas Co., State of Minnesota Gas Rate Schedule – MNPUC Volume 3, Section No. 6, Original Sheet No. 6-11, effective April 1, 2021.

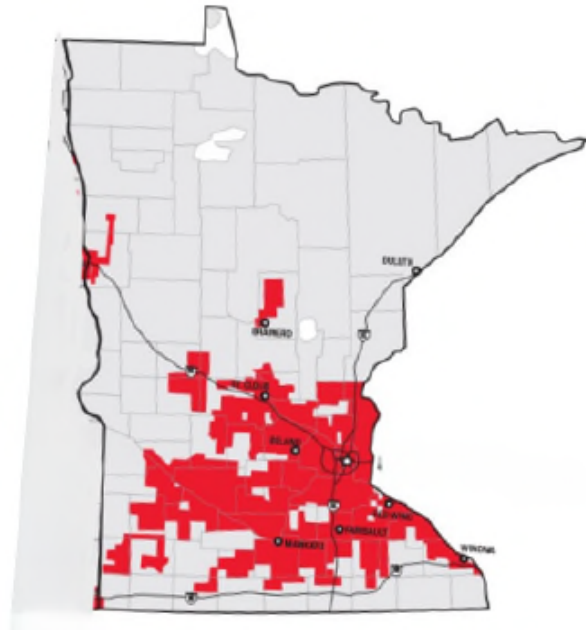
⁷ Greater Minnesota Gas, Inc., Gas Rate Book, Section VI, 6th Revised Sheet No. 10, effective April 12, 2022.

Map 1. Comparison of MERC and Xcel Energy Service Territories

MERC Natural Gas Service Territory



Xcel Energy Natural Gas and Electric Service Territory



MERC's current CEM allows existing customers to share in the cost of new line extensions. When a new customer is added to the distribution system, existing customers receive a benefit by having a larger customer base and consumption level over which to spread existing costs. Thus, the parties involved should equitably share in the extension costs of a new customer. Mindful of the Commission's concerns that existing customers should not subsidize growth, the CEM only allows for a sharing of the burden if existing customers benefit from the extension. If the new line extension is not a net revenue generator over the course of the line's life, the Company recovers the cost of the extension from the new customer through a contribution in aid of construction ("CIAC").

Topic #2: If the Commission should make modifications to regulated gas utilities' gas line extension policies, how would rules, statutes, and Commission orders justify those modifications?

As stated above, MERC does not believe modifications to its LEPs are warranted, nor does MERC believe the Commission should take a "one-size-fits-all" approach when it comes to LEPs. Under Minnesota law, natural gas utilities have an obligation to provide continuous, safe, reliable, and affordable service to all customers and LEPs permit natural gas utilities the ability to fulfill that obligation.

Additionally, on June 13, 2015, the Governor signed Minnesota Laws 2015 1st Special Session, Chapter 1, Article 3, Section 20, which created Minn. Stat. § 216B.1638,

Recovery of Natural Gas Extension Project Costs. Minn. Stat. § 216B.1638 was passed by the Legislation and signed into law to allow a public utility to petition the Commission outside of general rate case for a rider to recover the revenue deficiency from a natural gas extension project to serve an underserved or inadequately serve area. Therefore only 10 years ago, expansion of natural gas service was and continues to be at the forefront in State of Minnesota.

Topic #3: Which proposed modifications, if any, would necessitate gas utilities to coordinate and/or consult with electric utilities in the service territory where a gas line extension is being contemplated?

As stated above, MERC does not believe modifications to its LEPs are warranted, nor does MERC believe the Commission should take a “one-size-fits-all” approach when it comes to LEPs.

Significant electrification of home heating is expected to have a significant impact on GHG emissions due to the role natural gas electric generation facilities will need to play in helping to reliably produce electricity. Not only is natural gas-fueled generation less efficient than natural gas consumption used on site to produce heat, but further increases in energy needs via electrification results from the loss of energy through voltage transformation, transmission, and distribution from the source of generation to the point of consumption. Electrifying a major metropolitan area like Minneapolis would likely require an additional 30 GW of generation (growth of almost 1/3 the size of Midcontinent Independent System Operator (“MISO”)), costing customers billions in higher rates, while having little if any impact in reducing GHG emissions.

In situations where MERC’s LEPs come into practice, it is when a customer is requesting MERC to complete a gas line extension and to provide them with natural gas service. In these situations, it is not MERC who is driving the gas line extension, it is the customers’ request for natural gas service. Given the customers’ decision, it does not seem reasonable that the gas utility should coordinate and/or consult with the electric utility in the service territory; the customer has made their service choice and MERC presumes that if the customer had wanted only electric service, they would not made the request for gas service. Additionally, as noted in MERC’s LEP study, MERC conducted a survey of customers who had line extensions installed in 2023. In this survey, the Company asked customers if MERC hadn’t been able to extend natural gas to them, which energy source would they have used instead, and for both residential and C&I customers, the most frequent response was propane.⁸

MERC has probably the most unique gas service territory in Minnesota - unlike other natural gas utilities, MERC has very little geographic continuity within its service

⁸ LEP Study, filed in Docket No. G011/GR-22-504 (November 14, 2024), page 16.

Mr. Mike Bull

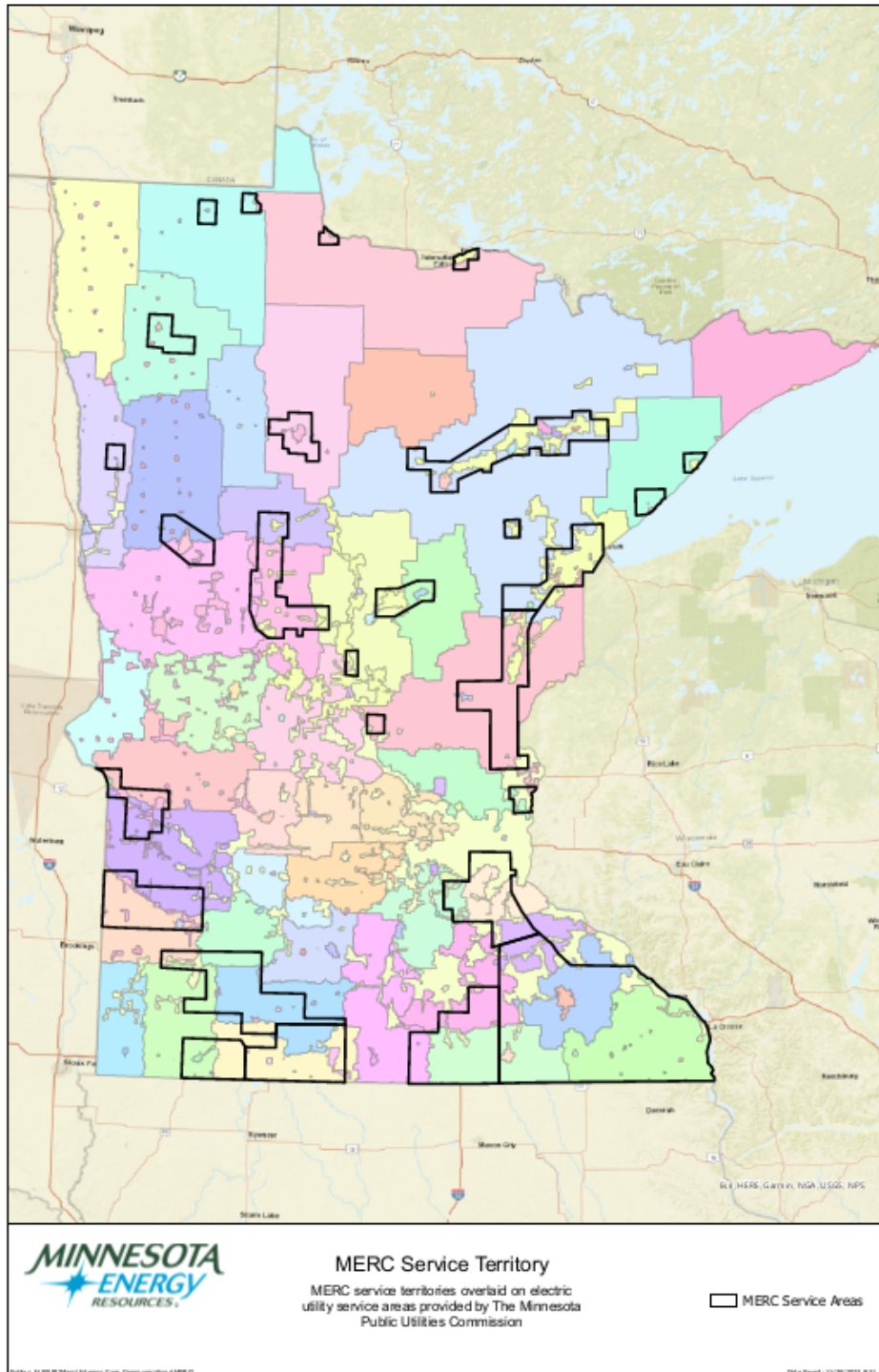
July 8, 2025

Page 6

territory. As shown in Map 2⁹ below, the areas MERC serves are scattered throughout all of Minnesota from International Falls to Rochester and overlap with dozens of electric utility providers including several electric cooperatives and municipal electric utilities. On average, MERC installs approximately 2,000 residential service line extensions annually. To “coordinate and/or consult” with the over 175 electric municipalities, cooperatives, and investor-owned utilities (“IOUs”) in the State of Minnesota on each of those 2,000 individual residential line extensions would create significant workload for both the natural gas and electric utilities, and would only serve to increase customer rates at both the natural gas and electric utility. Additionally, to conduct such significant workload on a residential service line extension that costs approximately \$1,800 (on average) would not be reasonable.

⁹ As depicted by the legend, MERC’s gas service territory is outlined by the bright colors. The underlying and differentiated colors shown on the map depict the service territories of the over 175 municipalities, cooperatives, and investor-owned utilities (“IOUs”) in the State of Minnesota.

Map 2: MERC Service Territory and electric service provider overlap



Additionally, outside factors are currently being used to facilitate the limited electrification activities that have been undertaken. It is not reasonable to assume that these options will remain, unchanged, into the future. As an example, the current federal

administration has placed a suspension on funds associated with the Federal Inflation Reduction Act (“IRA”) as well as heating assistance programs. These actions will most likely impact forecasts of electrification, as without funding, incentives, rebates or tax credits, customers are less likely to find it beneficial to pay for costly upgrades to their homes.

Lastly, the Commission has recently ordered MERC, CenterPoint Energy and Xcel Energy as part of the Gas Integrated Resource Planning process, that they are to work with electric utilities in their service territories to understand the electric system impacts on resource options in the natural gas Integrated Resource Plans (“IRPs”).¹⁰ As affirmed by the Commission, coordination between natural gas and electric utilities is reasonable at the *resource level* and the Company does not believe it would be reasonable to conduct such coordination at the detailed level of individual customer line extensions.

Topic #4: How should the Commission consider the results of Minnesota Energy Resources Corporation’s Line Extension Policy Study in this matter?

While some of the issues addressed in the LEP Study were specific to MERC and its 2023 Rate Case, other issues discussed in the LEP Study provide beneficial information to the Commission and parties for consideration in this docket. MERC’s LEP Study provides insight to specific examples of modifications to its LEPs and the impacts of those changes, although MERC cautions that other natural gas utilities’ LEPs are not identical to MERC’s and therefore LEP modifications can and will have differing impacts on each natural gas utility.

As part of the LEP Study, MERC held meetings with stakeholders, and through those conversations, it was agreed that while LEPs can be very computational and quantitative-based, there are also qualitative factors to take into consideration that are important, beneficial, and provide value to customers. Qualitative factors, such as customer access to conservation and energy efficiency programs, Cold Weather Rule protections, gas affordability programs, and stimulating economic development, cannot be quantified in a CEM calculation, but that does not mean that they do not provide benefits to customers and communities, and nor should they be overlooked when reviewing LEP.

Topic #5: What lessons should the Commission consider from proceedings in other states related to this matter?

MERC does not believe a “one-size-fits-all” approach is reasonable when it comes to LEP for each of the natural gas utilities within Minnesota, but the same can be said for the LEPs by state. Over the past approximately 15 years, states have been active in

¹⁰ Docket Nos. G088, G022, G011/CI-23-117, and G999/CI-565, Order Clarifying and Expanding Framework for Natural Gas Integrated Resource Planning, October 28, 2024, Order Point 30.

their efforts to promote expansion of access to the natural gas distribution system within their states either via enacted legislation, public utility commission orders or state investigations.¹¹ And each of these states have used a wide variety of mechanisms to promote line extensions at the consumer level, such as: no-cost extensions, footage allowances, financing of extensions through on-bill surcharges, CIAC payment plans, and specialized tariffs. Other states have used loans, bonds, ratemaking incentives, grants and other appropriations and tax incentives as mechanisms at the utility level to promote not only line extensions, but the economic growth and diversity of customers served that comes with those extensions.¹² Not only has historical practice shown within Minnesota, but also across the United States, that a “one-size-fits-all” has not been taken – and should not be an approach taken in the future.

At this point in time, MERC would argue whether adequate time has passed in other states to truly determine the effectiveness of LEP modifications and/or clear lessons learned. For example, MERC is unaware of any reports or findings on the ramifications of those LEP modifications, which is of utmost importance if Minnesota is to learn from these states’ experience. MERC also has concerns about the impact changes to LEPs could have upon low-income customers, as well as businesses and industry in Minnesota.

Topic #6: Should any distinctions be made between different customer classes when considering modifications?

MERC’s current LEP differentiates between residential and commercial customer classes, and the Company believes that distinction should remain. Under MERC’s Commission-approved tariffs, a CEM is required for residential customers where both a main and service extension is required, and residential customers receive a 75-foot service line allowance; for commercial customers, a CEM is also required, regardless of whether a main extension is involved, and commercial customers do not receive any footage allowance. One reason for the distinction between residential and commercial customers is that many line extensions to residential customers are service-line only extensions where the main is already within close proximity to residential customers. Another reason for the distinction is economics – for MERC residential customers, natural gas being an economic option is the most important consideration when completing a line extension, and affording residential customers a footage allowance simply makes line extensions a more cost effective option for residential customers.

While line extensions have a tendency to focus on residential customers, it is very important to realize that line extensions for commercial customers are vital to a state’s economy. Overwhelmingly, 70% of commercial customers stated in the customer survey MERC conducted on line extensions conducted in 2023 that if they had been not been able to connect to natural gas, they would have connected to propane instead.

¹¹ Report of the NARUC Task Force on Natural Gas Access and Expansion, November 2017.

¹² *Id.*

Not only do these commercial extensions provide economic value to communities by bringing in new commercial businesses and/or supporting existing commercial business, but also by providing employment opportunities. Additionally, commercial line extensions also serve the good of the public: 15% of MERC's commercial extensions in 2023 were to governmental or public organizations, such healthcare facilities, schools, libraries, food pantries, and justice centers.

Topic #7: How should the Commission consider the needs of low-income customers and other areas of equity in this matter?

MERC believes the impact on low-income and vulnerable customers should be part of the discussion surrounding LEP. Low-income households often face greater energy insecurity and are more vulnerable to rising energy costs. There needs to be consideration of the financial burden any changes to LEP will have on these customers. Especially in times such as these when there are drastic changes and impacts to funding from the federal government for energy assistance, MERC believes that caution must be taken when reviewing LEPs and the incremental impact it could have on low-income customers.

In 2023, 31% of MERC's residential extensions were to existing premises, and the overwhelming response from residential customers in the survey MERC conducted on line extensions conducted in 2023, customers would have maintained their existing propane fuel source if they had not been able to connect to natural gas. Historically, those who use wood or propane fuel sources are typically low-income customers, given that these fuel sources are typically a lower cost option, including installation costs. When reviewing the extension data provided by MERC in the 2023 Rate Case, 8.3% of service line-only extensions were conducted at premises either previously or currently occupied by LIHEAP customers. Providing low-income customers with access to the natural gas system delivers large social benefits via access to CWR protections and GAP, as well as access to the economic fuel source of natural gas.

The current cost benefit of LEP and footage allowances is that it allows new customers, including low-income customers, to be added to the distribution system and therefore costs are being spread across a larger customer base, whereby putting downward pressure of customer rates. If LEPs are modified such that there is a significant reduction in new customers being added to the natural gas distribution system, the converse will happen: costs will be spread across a smaller customer base than would otherwise be there, thereby putting upward pressure on customer rates. Many times, low-income customers or customers in environmental justice areas are the last customers that have the ability to make the investments needed to change their fuel source and that circumstance would be exacerbated if LEP modifications are made.

This situation was also discussed as a concern in the report Decarbonizing Minnesota's Natural Gas End Uses.¹³

Topic #8: Are there other issues or concerns related to this matter?

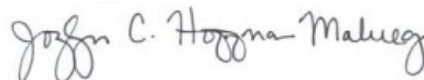
As stated above, the Company believes that the qualitative factors that LEP creates for customers, utilities and the State of Minnesota, are and should be an important consideration.

The Commission has been continuously addressing the topic of LEP for many years, as far back as 1990 in Docket No. G999/CI-90-563. In Docket No. G999/CI-90-563, the Commission reviewed LEP topics and policy questions that are still relevant today. One important question that will be shaped by LEP: should everyone in Minnesota have access to natural gas? Customer choice is an important consideration and some may even go so far as to say that customer choice is a right. Questions to consider: are people that want natural gas to be denied access for any reason, and is customer choice given equal consideration in the LEPs?

Gas line extensions and gas line extension policy plays a pivotal role in natural gas utilities' ability to continue investing in their distribution systems, which is essential as utilities continue to prudently plan their systems to keep customers safe, while making sure they have the heat needed during the coldest Minnesota winter evenings and that commercial customers have the energy they need to operate their businesses and employ Minnesotans. The Company appreciates the opportunity to provide input to the Commission and to participate in this proceeding.

DATED: July 8, 2025

Respectfully submitted,



Joylyn Hoffman Malueg
Senior Project Specialist
Minnesota Energy Resources Corporation

cc: Service List

¹³ Decarbonizing Minnesota's Natural Gas End Uses: Stakeholder Process Summary and Consensus Recommendations, Co-convened by the Great Plains Institute ("GPI") and Center for Energy and Environment ("CEE"), July 2021, pages 72-73.

In the Matter of a Commission Evaluation of
Changes to Natural Gas Utility Regulatory
and Policy Structures to Meet State
Greenhouse Gas Reduction Goals

Docket No. G999/CI-21-565

CERTIFICATE OF SERVICE

I, Colleen T. Sipiorski, hereby certify that on the 8th day of July, 2025, on behalf of Minnesota Energy Resources Corporation (“MERC”), I electronically filed a true and correct copy of the enclosed Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service lists.

Dated this 8th day of July, 2025

/s/ Colleen T. Sipiorski
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