Xcel Energy®

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February 10, 2023

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

—Via Electronic Filing—

RE: REPLY COMMENTS
2023 GAS UTILITY INFRASTRUCTURE COST RIDER
DOCKET NO. G002/M-22-578

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Reply to the January 26, 2023 Comments of the Department of Commerce, Division of Energy Resources and the January 30, 2023 Comments of the Office of the Attorney General—Residential Utilities Division and Fresh Energy regarding our 2023 Gas Utility Infrastructure Cost Rider Petition filed November 1, 2022 in the above-noted docket.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. If you have any questions regarding this filing, please contact Brandon Kirschner at (612) 215-5361 or brandon.m.kirschner@xcelenergy.com or Mary Martinka at (612) 330-6737 or mary.a.martinka@xcelenergy.com.

SINCERELY,

/s/

LISA R. PETERSON
DIRECTOR, REGULATORY PRICING & ANALYSIS

Attachments

c: Service List

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BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF A GAS UTILITY INFRASTRUCTURE COST RIDER TRUE-UP REPORT FOR 2021, UPDATED COSTS FOR 2022, REVENUE REQUIREMENTS FOR 2023, AND REVISED ADJUSTMENT FACTORS

DOCKET NO. G002/M-22-578

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) this Reply to the January 26, 2023 Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) and the January 30, 2023 Comments of the Office of the Attorney General—Residential Utilities Division (OAG) and Fresh Energy. We appreciate the parties' thorough review of our 2023 Gas Utility Infrastructure Cost (GUIC) Rider Petition (Petition) filed November 1, 2022 in the present docket.

There were several issues addressed in the parties' comments that we will respond to in our Reply Comments. Those issues include:

- Expiration of the Recovery of GUIC Statute[1]
- Plan to wind-down GUIC Rider
- Cancelled/Deferred GUIC projects
- Report on Casing Renewal project cost effectiveness

In addition, we confirm that we will complete several compliance obligations as requested by the Department. Specifically, we will provide a compliance filing, based on Commission decisions, within ten days of a Commission Order, and we will report reimbursements as offsets in future true-up filings.

We respectfully reaffirm our request that the Commission authorize recovery of the 2023 GUIC revenue requirement, $37.5 million.

[1] Minn. Stat. § 216B.1635.

REPLY

A. Expiration of the Recovery of GUIC Statute

As we noted in our initial filing in this docket, with the GUIC statute set to expire on June 30, 2023, there are two open questions:

- After June 30, 2023, what happens to pending GUIC requests? and
- After June 30, 2023, what happens to recovery of GUIC-related costs?

On the first question, the three parties who commented in this docket varied in their positions on what to do with pending requests. The OAG contends that the Commission no longer has the authority to approve a GUIC Rider request after the expiration of the statute.[2] The Department argues that the Commission can approve the Company's requested recovery mechanism but must act before June 30, 2023.[3] Both Fresh Energy and the Department suggested that the Commission should not consider future GUIC petitions. Fresh Energy did not express a specific opinion on pending GUIC Rider requests, but the Department appears to support Commission consideration of the pending requests.

We continue to believe that the Commission may consider GUIC requests that are filed before the expiration of the statute. And, even if the Commission could not approve recovery of our request using the GUIC Statute, nothing prevents the Commission from establishing a rider and granting recovery of a utility's reasonable and prudent costs.[4] This is particularly pertinent here, where the Company's request is limited to recovering costs incurred to implement mandated safety improvements. We also acknowledge that a Commission decision before June 30, 2023 would eliminate this potential dispute.

Conditioning recovery on Commission action prior to June 30, 2023 is not appropriate. This is in part because the Company has made its request timely but factors beyond the Company's control have a hand in the timing of Commission consideration. In this case, for instance, the Department of Commerce requested a 60-day extension to file its initial comments on the Company's proposal, which the Commission granted. We believe that the more reasonable interpretation is that the Commission can rule on our proposal when it has the information and performed the analysis that it needs.

On the second question—what happens to recovery of GUIC-related costs after June 30, 2023—the OAG has advanced two positions. First, it claims that the Commission cannot approve recovery of any costs that will be incurred beyond June 30, 2023,

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[2] OAG Comments at 2.
[3] Department Comments at 19.
[4] *See* Minn. Stat. § 216B.03.

regardless of when the Company requests approval or when the Commission grants approval.[5] Second, it claims that the Commission "would also be justified" in ordering that all rider recovery, including recovery for past projects, to "terminate entirely after June 30, 202[3] . . . ."[6] Both of these positions should be rejected.

The OAG's first position—that the Commission cannot approve recovery of projects that are placed in service after June 30, 2023—should be rejected because it has no basis in the GUIC Statue. The GUIC statute allows utilities to submit a project plan for their GUIC, and for the Commission to approve a corresponding recovery mechanism. Nothing in the statute restricts recovery of utility costs based on *when projects are placed in service*. As the OAG itself notes, "[n]othing in the text of the statute limits how far into the future a utility can project GUIC revenue requirements . . . ."[7] Since the statute does not make projects recoverable based on when those projects are placed in service, the expiration of the statute also does not limit recoverability based on when a project is placed in service. Rather, the statute's expiration restricts the utility's ability to continue to make future recovery requests based on the authority of the GUIC Statute. Here, the Company has made its request while the GUIC Statute is in effect.

In response to this reasoning, the OAG creates a hypothetical scenario that does not exist in this case. Specifically, the OAG argues that "[u]nder Xcel's interpretation, a utility could, for example, file a GUIC petition on June 29, 2023, forecasting its GUIC revenue requirement for 2024 with rider factors to be effective March 1, 2025, through February 28, 2026, and the Commission would have authority to approve it."[8] The point of this hypothetical is somewhat unclear since, as noted above, the OAG admits that the GUIC Statute allows the Commission to approve recovery of future projects; and recovery of projects typically occurs well after those projects were placed in service. In any event, the Company has not sought approval of its 2024 GUIC costs. Moreover, the GUIC Statute limits utilities to filing a GUIC proposal "no more than once per year."[9] Since the instant request was filed in November, we do not believe the statute authorizes another request by June 29, 2023.

The OAG's position is also in tension with the express statutory text requiring that a utility's GUIC reports "must be for a forecast period of one year." [10] The Company could not have filed a report for only the first six months of 2023, as the OAG appears to suggest. Rather, the Company's filing was required to utilize a forecast period of one year. The Company submitted its filing long before the statute expired in the manner prescribed by the statute. There should be no question that the

[5] OAG Comments at 3.
[6] OAG Comments at 3.
[7] OAG Comments at 2, n.6.
[8] OAG Comments at 1-2.
[9] Minn. Stat. § 216B.1635, Subd. 4(1).
[10] Minn. Stat. § 216B.1635, Subd. 2.

Commission can review this filing and approve recovery of costs it determines to be "prudently incurred and achieve gas facility improvements at the lowest reasonable and prudent cost to ratepayers."[11]

Finally, the Company disagrees with the OAG's argument on how the Commission should consider its decision to grant recovery of costs under the State Energy Policy (SEP) Rider after the applicable statute was repealed. The OAG notes that the Commission's decision in that case addressed only the post-repeal recovery of costs that were incurred before the statute's repeal.[12] The OAG concludes from this fact that the Commission should only approve recovery of GUIC costs incurred by June 30, 2023. But the OAG also explains that repeal of the statute authorizing the SEP Rider presented a different context than the sunset of the GUIC Statute here, because repeal of the SEP Rider was explicitly linked to the passage of a new recovery mechanism—the GUIC Rider.[13] This difference is important. It made sense for the Commission to limit recovery of SEP costs to only those that were incurred before the statute was repealed because a new mechanism was available for recovery of future costs. That is not the case here. In this case, a Commission decision to deny recovery of the Company's GUIC after June 30, 2023 would deny the Company any ability to recover these mandated safety improvements—even if they are prudent and reasonable. Accordingly, the Company believes that the Commission's decision in the SEP Rider is best applied more generally than the OAG suggests; for the proposition that a utility's rider recovery for prudent costs can extend beyond the repeal or sunset of an applicable statute. We believe there are good policy reasons for the Commission to approve recovery for GUIC in 2023, and that the Commission can do so since the Company filed its request while the GUIC Statute was in effect. The Commission's decision on the SEP Rider to limit recovery to costs incurred before the statutory repeal should not be mechanically applied to this case, as the OAG suggests, when the outcome of this decision would be substantially different.

The OAG's second position—that *all* GUIC recovery terminate after June 30, 2023—is also without justification. Admittedly, the OAG barely makes the case for this position. Rather, the OAG's entire argument for this position is contained in a single parenthetical that follows its primary position that the Company cannot recover costs that are not approved by June 30, 2023.[14] And its position that all recovery must terminate after June 30, 2023 is at odds with even the OAG's narrow reading of the Commission's decision on the SEP Rider.[15]

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[11] *See* Minn. Stat. § 216B.1635. Subd 5.
[12] *See* OAG Comments at 3.
[13] *See id.*
[14] *See* OAG Comments at 2.
[15] *See* OAG Comments at 3. "The Commission's reasoning was that SEP Rider recovery could continue only for projects constructed and costs incurred *prior to the statute's repeal*." (Emphasis in original). The OAG's argument that all cost recovery should terminate after June 30, 2023 would mean that costs incurred prior to the statute's repeal would not be recovered.

Still, the OAG's suggestion that all recovery should end highlights the unreasonableness of the overall opposition to the Company's request. Due to the length of our recent GUIC Rider proceedings, a significant amount of regulatory lag has now been built into our recovery of GUIC Rider revenues. For example, our 2021 GUIC Rider request was initially filed on October 23, 2020 and was finally approved by the Commission on November 28, 2022. Those 2021 costs are now being recovered through February 28, 2023. Similarly, we filed our 2022 request on October 29, 2021 and are still waiting for a resolution from the Commission. Due to previous delays, and to avoid recovering costs from multiple years of GUIC work, the Company has proposed recovering these costs starting March 1, 2023, through February 29, 2024. The OAG's suggestion that GUIC recovery should end in June 2023 would prevent the Company from recovering legitimately incurred costs from 2022 and 2023. This outcome is also possible under the OAG's and DOC's position that the Commission must approve recovery of any costs before June 30, 2023. This is one more reason that the Company's position is most reasonable; if it requests cost recovery while the GUIC Statute is in effect, it can recover the prudently incurred costs that the Commission approves.

Finally, both the Department and Fresh Energy expressed a position that recovery of these costs could continue in a different mechanism. The Company agrees with this position. The work done through the GUIC is critical to the safety and reliability of our system and allows us to continue work to meet federal and state pipeline safety regulations. That work will need to continue, and we will continue to seek recovery of these costs either through the GUIC Rider as we have done, or a different mechanism. Ultimately, this is likely not a dispute about the recoverability of these GUIC costs, but rather a technical dispute about the mechanism used to recover the costs. The GUIC Rider has been an effective tool in helping the Company avoid the need to file natural gas rate case and provides a unique venue to assess critical work with the focus it deserves. Without the recovery mechanism the GUIC Rider provides, the possibility of routine and consistent natural gas rate cases will be increased. This increase in regulatory burden can be avoided by continuing to allow the use of the GUIC Rider, regardless of legislative action on the statute.

B. Plan to Wind-Down GUIC Rider

Fresh Energy has advocated for the Company to submit a plan to wind-down the use of the GUIC Rider. As they noted in their comments, the Company has agreed to file a report as a part of the settlement agreement in our pending natural gas general rate case. If the wind-down plan stipulation is included as a part of the final settlement approved by the Commission, we can confirm that we will prepare a wind-down report and file it within a GUIC Rider docket.

However, we continue to have concerns with Fresh Energy's characterization of the necessity of continued investment in our natural gas system infrastructure. A central theme of Fresh Energy's comments is that investment in natural gas system infrastructure now makes a potential transition to alternatives in the future more difficult and costly. However, this position ignores key issues that highlight the continued need for system investments. GUIC work is not intended to expand our natural gas system or increase the throughput available. It is intended to meet federal and state regulations, respond to infrastructure relocations, and maintain the natural gas system as it exists now. The Company is responsible for operating a safe and reliable system, and this work allows us to fulfill that responsibility. The Company's obligation to operate safely and reliably is unchanged by any future planning scenarios.

Catastrophic failures, which can lead to injuries, death, and significant property damage, highlight the criticality of maintaining the system as it is currently used to reduce the possibilities of severe events.[16] Neglecting to make investments now, even if the system may be used differently in the future, exposes our system to the risk of greater stresses and deterioration.

We believe that Fresh Energy's recommendation to continue this discussion in another policy proceeding makes sense,[17] with a holistic discussion of potential future scenarios. Those discussions are not appropriate in the GUIC Rider, however, which is focused on the Company's safety and integrity work.

C. Cancelled/Deferred GUIC Projects

In response to the Department's comments on removing delayed or cancelled projects from our request in this docket, the Company provides the following information about changes in our scope of work for 2023 since our initial filing. The Company has identified four Programmatic Mains and Services Replacement distribution projects that we no longer plan to complete in 2023. Table 1 below shows the details of these four projects.

[16] Examples of events include:
http://www.oregonlive.com/business/index.ssf/2010/09/san_bruno_explosion_shows_agin.html.;
Kentucky Gas Line Explosion Destroys Homes, Injures 2 - ABC News (go.com);
http:\www.twincities.com\2014\05\25\northwestern-minnesota-gas-pipeline-explosion-it-was-just-hell-on-earth\.

[17] Either the Future of Gas docket (Docket No. G999/CI-21-565) or the natural gas integrated resource planning docket (Docket No. G999/CI-21-135).

Table 1
Cancelled 2023 GUIC Projects

City	Description	Estimated 2023 Service Cost	Estimated 2023 Mains Cost
Roseville	Larpenteur Avenue W	$18,591	$136,300
Mounds View	County Road I	$3,718	$17,684
Mounds View	Count Road H	$18,591	$82,485
New Brighton	Forest Dale Road	$91,098	$305,500
Total		**$131,998**	**$541,969**

The total estimated 2023 capital costs for the four cancelled or delayed projects, including both services and mains costs, is about $674,000. The estimated 2023 revenue requirement impact of these projects not occurring in 2023 is about $37,000.

With the cancellation of these projects for 2023, the Company will have increased bandwidth to complete other high-risk Programmatic Mains and Service Replacement projects during the 2023 construction season. The Company is currently in the process of identifying the additional work that will be completed this year instead but anticipates that the total costs of the replacement projects will be comparable to the projects being replaced. As such, we do not anticipate any financial impact at this time and believe that the financial schedules we provided with our initial filing do not need to be updated. As has been customary with previous filings, the Company will only recover actual costs for the requested year and will provide details on the final actual costs incurred once they are fully known. The Company normally provides updated financial schedules after all costs are known and plans to do so with this request.

D. Report on Casing Renewal Project Cost Effectiveness

As mentioned by the Department in their comments, and as the Company committed to in our initial filing, we provide a cost metric report for the casing renewal program. This report discusses the cost effectiveness of various potential alternatives to replacing pipe as a part of the casing renewal program. Please see Attachment A to these Reply Comments. Please note that the Company provided a comparison of estimated to actual cost of casing renewal projects as a part of our initial filing.[18]

[18] See Attachment U, Pages 8 and 17.

CONCLUSION

We respectfully request that the Commission, consistent with its previous Orders, grant recovery of the Company's gas utility infrastructure costs through a GUIC Rider and approve our proposed 2023 GUIC Rider factors.

Dated: February 10, 2023

Northern States Power Company

Casing Renewal Project Cost Effectiveness

In Xcel Energy's Gas Utility Infrastructure Cost (GUIC) Rider proceeding, Docket No. G002/M-20-799, the Company and Department of Commerce had proposed different performance metrics to measure the cost effectiveness of the Company's Casing Renewal Program. The Company proposed Estimated vs. Actual Cost per project. The Department proposed the cost effectiveness of the solution compared to other remediation options. At the Minnesota Public Utilities Commission's (Commission) hearing on the matter, the Company provided information explaining in more detail why it preferred its cost effectiveness metric. The Department and Commission ultimately agreed but ordered the Company to provide the information communicated orally at hearing into the record in the present docket.[1] We provide that information below.

Pipeline casings were a common installation method for road and railroad crossings. Casings serve as an oversized conduit to allow the pipeline to be installed without disturbing the road or railroad, while also providing structural and mechanical load protection to the pipeline. Improvements in horizontal directional drilling methods now give utilities the ability to install pipelines under roads and railroads without the need for casings or open cutting of ground surfaces.

If a casing is shorted (i.e., a casing that is or may be in contact with the natural gas pipeline), then the shortened casing needs to be remedied. To better understand methods used to remediate shorted casings, one first needs to consider how casings can become shorted. Casings can be shorted in three ways, listed below.

- Electrolytic Short (water and/or soil located inside the casing causes a short between the casing and the gas pipe)
- Metallic short (metal to metal contact) at the end of the casing—this is commonly caused by misalignment between the casing and the gas pipeline
- Metallic short (metal to metal contact) at the center of the casing—this is commonly caused by failure of casing spacers inside the casing.

Unfortunately, it is not possible to know specifically how a casing is shorted prior to work being undertaken. In some scenarios *all three types* of shorts can exist on the same casing.

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[1] *See* the Commission's November 18, 2022 Order in Docket No. G002/M-20-799 at Order Point 10.

There are two methods to remediate a shorted casing. First is a replacement of the shorted pipeline. The other option is to excavate both ends of the casing, inspect and re-center the pipe inside the casing, remove any electrolyte (water or soil) from inside the casing, and repair or replace damaged casing spacers and end seals.

The only guaranteed method to remediate a shorted casing is replacing it. Excavation can only fix electrolytic shorts and metallic shorts that are located at the end of the casing. In those scenarios, excavation is not commonly successful, because "re-centering" the pipe inside the casing requires moving the pipe or casing, which is extremely challenging due to the casings being located under roads and railroads. Even if the Company is successful in mitigating a short at the end of the casing, it is very likely that a short could remain at the center of the casing. In addition, if the Company is successful at remedying the shortened casing, because the pipeline is still cased, it will need to be tested annually to ensure that it has not shorted again. Metallic shorts at the center of the casing are not possible to mitigate without replacement.

From a cost and safety perspective given the construction vintage of casings and their primary locations under roads and railroads, excavation is also expensive and presents safety challenges due to difficult excavation. In many cases, the road under which the casing was originally installed has expanded, so exposing the ends of the casing requires excavation in the travel lane of a road.

Stated briefly: in the *short term*, it is possible in some instances that excavation is less costly than replacement of a shortened casing (e.g., if the excavation quickly identifies and is able to remedy the reason for the short), but over the *long term*, replacement is more cost effective because it eliminates the need to regularly monitor cased pipelines, to remedy any cased pipelines that become shorted, and lessens the overall number of cased pipelines on our gas system.

CERTIFICATE OF SERVICE

I, Crystal Syvertsen, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota

xx electronic filing

Docket No. G002/M-22-578

Dated this 10th day of February 2023

/s/

Crystal Syvertsen
Regulatory Administrator

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