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Minneapolis, MN 55401

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November 1, 2024

—Via Electronic Filing—

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

RE: SUPPLEMENTAL FILING
CHANGES IN CONTRACT DEMAND ENTITLEMENTS
DOCKET NO. G002/M-24-271

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this filing to supplement our August 1, 2024 Petition (Petition) in the above-referenced docket.

There is no change (adjustment) in costs from the request in our Petition. In this filing we provide an update on the status of our Maplewood Propane Air peak shaving plant. We also provide an update to the Company's hedging transactions for the upcoming heating season.

As a result, we include the following revised attachments:

Attachment 2, Schedule 2

Attachment 3, Schedule 1, Page 2

Update on Peaking Plants

The Company began a project at the Maplewood plant in the spring of 2024 to upgrade the facility and ensure continued safe and reliable gas supply to the system during design day scenarios. Improvements include the complete replacement of: all tank bank gas piping and valves; electrical systems; fire and gas detection and suppression; and instrumentation and measurement devices for each of the 37 propane tanks. To do so, the tanks at the plant were completely de-inventoried. As a result of project delays, the plant is not available

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to start the heating season, however we expect to have limited storage capacity in late December and will provide an update on the plant's status on December 1.

Because the anticipated return of Maplewood is during (not prior to the start of) the 2024-2025 heating season, the Company has provided a plan below to meet design day conditions in the event that they occur before the plant has enough inventory to meet full output capacity.

First, we note that a design day event is unlikely in December. NSP's design day is a once in 30-year lowest average temperature and has not occurred since February 1996. Since that time, NSP has experienced several extremely cold events, which have all occurred around Christmas or later in the heating season and have not reached the temperature levels expected during a design day event.¹ Based on records of temperatures dating back to the 1950s, the coldest it has been in the Twin Cities in November is a daily average of -4 degrees Fahrenheit. Therefore it is quite unlikely that we will experience design day conditions while the output of Maplewood is limited.

Additionally, we customarily plan to maintain a transportation capacity reserve margin as close as practicable to either the capability of the largest pump at Wescott used to vaporize LNG or to the capability of either Sibley or Maplewood. This planned reserve margin helps us manage through unanticipated events such as the limited availability or unavailability of the peaking plants. During a period when the plant is limited, we first plan to fully utilize the reserve margin transportation capacity as necessary. Our planned transportation reserve margin plus this additional capacity is 35,092 Dth/day of additional firm transportation capacity during the 2024-2025 heating season—this is approximately 80 percent of the output of Maplewood.

The Company next plans to utilize NNG interruptible capacity service. NNG's interruptible service is subject to availability, and therefore the amount of capacity the Company could secure under this program is not guaranteed. That said, NNG did have interruptible capacity available during the February 2021 Gas Pricing Event (which was not a design day event, but was certainly a period of high demand and limited supply). We believe the fact that NNG's interruptible service was available during the February Gas

¹ Under our DD conditions, the average of the high and the low daily temperatures across all our operations areas would be -26 degrees Fahrenheit.

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Pricing Event suggests that it would be reasonable for the Company to try to secure interruptible capacity in the event design day conditions were experienced prior to Maplewood being able to meet full output. Finally, the Company is also able to utilize the Capacity Sharing Agreement (Docket No. E,G002/M-15-618), which allows the LDC to borrow (at cost) transportation capacity from NSP Generation. NSP Generation has 283,327 Dth/day of firm transportation capacity.

Table 1
Company's Plan for Meeting Design Day Conditions
during 2022-2023 Heating Season

Possible Scenarios		1	2
Maplewood Inventory Filled?		No	Yes
Resulting Capacity Needed to Meet DD (Dth/day)		44,000	0
Plan to Meet DD	Curtail Interruptible Customers?	Yes	Yes
	Utilize Reserve Margin? (35,902 Dth/day)	Yes	Yes
	Attempt to Utilize NNG Interruptible Service? (unknown Dth/day)²	Yes	Yes
	Utilize Capacity Sharing Agreement (up to 283,327 Dth/day)	Yes, ~8,900 Dth/day less any capacity obtained through NNG interruptible service	No

As can be seen from the table above, if there were design day conditions before Maplewood is available with full output, then the Company would need to utilize a portion of NSP Generation's pipeline capacity in order to

² Recalling the amount of LNG in storage at Wescott cannot be increased over the heating season, it's worth noting that once the peaking plants are back in service and depending on operating conditions, the Company may still choose to utilize NNG's interruptible service in lieu of operating the peaking plants.

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serve its firm natural gas customers. Utilizing NSP Generation's capacity would limit NSP Generation's ability to utilize its natural gas fired generation facilities. Impacted generation facilities could operate on alternative fuels to the extent they were available. Despite that, if NSP Generation did not have enough capacity to meet its customers' electricity need, then it could purchase energy through the MISO market and/or curtail its interruptible electric customers. Once Maplewood has its target inventory level the Company will be able to meet its design day and have its reserve margin.

Update on Hedging Transactions

Updated hedging transactions are presented on the revised **Attachment 3, Schedule 1**. We completed hedging for the 2024-2025 heating season by executing a total of six call options. **Attachment 3, Schedule 1** now reflects all of the current hedging transactions. Total hedging costs for the 2024-2025 heating season are \$7,318,500. If natural gas prices rise as they are forecasted to do during the heating season, then it is more likely a portion of our hedges will be exercised.

Miscellaneous

Portions of this filing contain trade secret information, as defined under Minn. Stat. § 13.37. As such, this data is protected from public disclosure and has been marked accordingly. Xcel Energy makes extensive efforts to maintain the secrecy of this information. This information is not available outside the Company except to other parties involved in contracts and to regulatory agencies under the confidentiality provisions of state or federal law, as evidenced by the non-disclosure provisions in the contracts. Xcel Energy also provides this information to state regulatory agencies in the Annual Automatic Adjustment of Charges Reports and in the monthly purchased gas adjustment (PGA) filings in the confidential trade secret versions of these reports.

The supply information has economic value to Xcel Energy, its customers, suppliers, and competitors in at least three ways. If suppliers know the terms of Xcel Energy's supply and transportation contracts, they may be able to use this knowledge to fashion bids to Xcel Energy. Suppliers will be reluctant to offer special favorable terms to Xcel Energy if they know other competitors or customers will gain knowledge of the terms and demand similar terms in the future. Competitors of Xcel Energy such as other LDCs also purchase their services. These competitors may be able to leverage knowledge of Xcel Energy's costs to gain similar terms or may offer slightly better prices to suppliers, denying Xcel Energy's access to this gas or other services.

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Any of these results would harm Xcel Energy and its natural gas customers. Because Xcel Energy competes for supplies, transportation, storage, and other services in the wholesale market, disclosure would directly harm Xcel Energy by making its delivered supply cost less competitive. To the extent that Xcel Energy supply costs rise, Xcel Energy's regulated sales customers would have to pay higher natural gas rates. This result would not serve the public interest.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact me at (612) 330-7681 or lisa.r.peterson@xcelenergy.com or Jennifer Roesler at (612) 330-1925 or jennifer.roesler@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

LISA PETERSON
DIRECTOR, REGULATORY PRICING AND ANALYSIS

Enclosures
cc: Service List

Northern States Power Company
MINNESOTA STATE RATE IMPACT

Revised from 8/1/24 filing

Date to implement proposed changes: November 1, 2024
 \$/Dth

Docket No. G002/M-24-271
 Contract Demand Entitlements-Petition
 REVISED Attachment 2, Schedule 2
 Page 1 of 4

	Last Rate Case (G002/GR-21- 678)	Pending Demand Change (G002/M-23- 361)	Last Month PGA: October 2024	Estimated Nov 2024 PGAs with Proposed Demand Entitlement Changes	Change From Last Rate Case	Change From Last Approved Demand Change	Percent Change (%) From Last Month PGA	Change (\$) From Last Month PGA
Residential								
Commodity Cost of Gas (WACOG)	\$6.4988	\$3.1535	\$2.0251	\$2.4880	-61.72%	-21.10%	22.86%	\$0.4629
Demand Cost of Gas (1)	\$1.0599	\$1.0857	\$1.1596	\$1.1561	9.08%	6.48%	-0.30%	(\$0.0035)
February Gas Event	\$0.4219	\$0.4219	\$0.4219	\$0.4219			0.00%	\$0.0000
Distribution Margin	\$2.7493	\$2.7493	\$2.7493	\$2.7493	0.00%	0.00%	0.00%	\$0.0000
Total per Dth Cost	\$10.7299	\$7.4104	\$6.3559	\$6.8153	-36.48%	-8.03%	7.23%	\$0.4594
Average Annual Usage (Dth)	88	88	88	88				
Average Annual Total Cost	\$942.75	\$651.09	\$558.44	\$598.81	-36.48%	-8.03%	7.23%	\$40.36
Average Annual Total Demand Cost of Gas	\$93.13	\$95.39	\$101.89	\$101.58				(\$0.31)
Small Commercial								
Commodity Cost of Gas (WACOG)	\$6.5967	\$3.1535	\$2.0251	\$2.4880	-62.28%	-21.10%	22.86%	\$0.4629
Demand Cost of Gas (1)	\$1.0685	\$1.0937	\$1.1756	\$1.1641	8.95%	6.44%	-0.98%	(\$0.0115)
February Gas Event	\$0.9389	\$0.9389	\$0.0000	\$0.0000			0.00%	\$0.0000
Distribution Margin	\$2.1974	\$2.1974	\$1.1673	\$1.1673	-46.88%	-46.88%	0.00%	\$0.0000
Total per Dth Cost	\$10.8015	\$7.3835	\$4.3680	\$4.8194	-55.38%	-34.73%	10.33%	\$0.4514
Average Annual Usage (Dth)	238	238	238	238				
Average Annual Total Cost	\$2,574.14	\$1,759.58	\$1,040.96	\$1,148.53	-55.38%	-34.73%	10.33%	\$107.57
Average Annual Total Demand Cost of Gas	\$254.64	\$260.64	\$280.16	\$277.42				(\$2.74)
Large Commercial								
Commodity Cost of Gas (WACOG)	\$6.5967	\$3.1535	\$2.0251	\$2.4880	-62.28%	-21.10%	22.86%	\$0.4629
Demand Cost of Gas (1)	\$1.0353	\$1.0629	\$1.1372	\$1.1333	9.47%	6.62%	-0.34%	(\$0.0039)
February Gas Event	\$0.0000	\$0.5891	\$0.0000	\$0.0000			0.00%	\$0.0000
Distribution Margin	\$1.8410	\$1.8410	\$1.1658	\$1.1658	-36.67%	-36.67%	0.00%	\$0.0000
Total per Dth Cost	\$9.4731	\$6.6465	\$4.3281	\$4.7871	-49.47%	-27.98%	10.61%	\$0.4590
Average Annual Usage (Dth)	1,613	1,613	1,613	1,613				
Average Annual Total Cost	\$15,279.26	\$10,720.27	\$6,980.90	\$7,721.23	-49.47%	-27.98%	10.61%	\$740.33
Average Annual Total Demand Cost of Gas	\$1,669.85	\$1,714.37	\$1,834.21	\$1,827.92				(\$6.29)

(1) Includes demand smoothing

	Last Rate Case (G002/GR-21- 678)	Pending Demand Change (G002/M-23- 361)	Last Month PGA: October 2024	Estimated Nov 2024 PGAs with Proposed Demand Entitlement Changes	Change From Last Rate Case	Change From Last Approved Demand Change	Percent Change (%) From Last Month PGA	Change (\$) From Last Month PGA
Small Interruptible								
Commodity Cost of Gas (WACOG)	\$6.5164	\$3.1535	\$2.0251	\$2.4880	-61.82%	-21.10%	22.86%	\$0.4629
Demand Cost of Gas (1)	\$0.0000	\$0.0000	\$0.0000	\$0.0000				\$0.0000
February Gas Event	\$0.0000	\$0.7414	\$0.0000	\$0.0000			0.00%	\$0.0000
Distribution Margin	\$1.4885	\$1.4885	\$0.9121	\$0.9121	-38.72%	-38.72%	0.00%	\$0.0000
Total per Dth Cost	\$8.0048	\$5.3834	\$2.9372	\$3.4001	-57.52%	-36.84%	15.76%	\$0.4629
Average Annual Usage (Dth)	8,513	8,513	8,513	8,513				
Average Annual Total Cost	\$68,147.76	\$45,830.38	\$25,005.73	\$28,946.55	-57.52%	-36.84%	15.76%	\$3,940.83
Average Annual Total Demand Cost of Gas	\$0.00	\$0.00	\$0.00	\$0.00				\$0.00
Medium Interruptible								
Commodity Cost of Gas (WACOG)	\$6.8156	\$3.1535	\$2.0251	\$2.4880	-63.50%	-21.10%	22.86%	\$0.4629
Demand Cost of Gas (1)	\$0.0000	\$0.0000	\$0.0000	\$0.0000				\$0.0000
February Gas Event	\$0.0000	\$0.4917	\$0.0000	\$0.0000			0.00%	\$0.0000
Distribution Margin	\$0.8478	\$0.8478	\$0.4498	\$0.4498	-46.94%	-46.94%	0.00%	\$0.0000
Total per Dth Cost	\$7.6634	\$4.4930	\$2.4749	\$2.9378	-61.66%	-34.61%	18.70%	\$0.4629
Average Annual Usage (Dth)	51,645	51,645	51,645	51,645				
Average Annual Total Cost	\$395,774.81	\$232,038.06	\$127,814.99	\$151,721.42	-61.66%	-34.61%	18.70%	\$23,906.43
Average Annual Total Demand Cost of Gas	\$0.00	\$0.00	\$0.00	\$0.00				\$0.00
Large Interruptible								
Commodity Cost of Gas (WACOG)	\$6.8379	\$3.1535	\$2.0251	\$2.4880	-63.61%	-21.10%	22.86%	\$0.4629
Demand Cost of Gas (1)	\$0.0000	\$0.0000	\$0.0000	\$0.0000				\$0.0000
February Gas Event	\$0.0000	\$0.4917	\$0.0000	\$0.0000			0.00%	\$0.0000
Distribution Margin	\$0.7977	\$0.7977	\$0.4114	\$0.4114	-48.42%	-48.42%	0.00%	\$0.0000
Total per Dth Cost	\$7.6355	\$4.4429	\$2.4365	\$2.8994	-62.03%	-34.74%	19.00%	\$0.4629
Average Annual Usage (Dth)	631,398	631,398	631,398	631,398				
Average Annual Total Cost	\$4,821,054.11	\$2,805,208.67	\$1,538,421.30	\$1,830,695.65	-62.03%	-34.74%	19.00%	\$292,274.35
Average Annual Total Demand Cost of Gas	\$0.00	\$0.00	\$0.00	\$0.00				\$0.00

(1) Includes demand smoothing

Summary - Change from most recent PGA

<u>Customer Class</u>	<u>Commodity Change (\$/Dth)</u>	<u>Commodity Change (Percent)</u>	<u>Demand Change (\$/Dth)</u>	<u>Demand Change (Percent)</u>	<u>Demand Annual Change (\$/Dth)</u>	<u>Total Annual Change (\$/Dth)</u>	<u>Total Annual Change (Percent)</u>
Residential	\$0.4629	22.86%	(\$0.0035)	-0.30%	(\$0.31)	\$40.36	7.23%
Small Commercial	\$0.4629	22.86%	(\$0.0115)	-0.98%	(\$2.74)	\$107.57	10.33%
Large Commercial	\$0.4629	22.86%	(\$0.0039)	-0.34%	(\$6.29)	\$740.33	10.61%
Small Interruptible	\$0.4629	22.86%	\$0.0000	NA	\$0.00	\$3,940.83	15.76%
Medium Interruptible	\$0.4629	22.86%	\$0.0000	NA	\$0.00	\$23,906.43	18.70%
Large Interruptible	\$0.4629	22.86%	\$0.0000	NA	\$0.00	\$292,274.35	19.00%

DERIVATION OF CURRENT PGA COSTS

Nov. 2024 - Projected Costs (Actual prices will be determined Nov. 1, 2024)*

Revised from 8/1/24 filing

<u>Demand Cost (Res, Sm & Lg Commercial Firm)</u>		<u>Annual Cost</u>	<u>Winter Cost</u>	<u>Total</u>
1.	MN & ND Total Demand	\$50,970,509	\$35,820,719	
2.	x <u>Minnesota Design Day Ratio (2024 Demand Entitlement Filing)</u>	86.42%	86.42%	
3.	Annual System Demand Allocation to MN	\$44,051,002	\$30,957,873	
4.	<u>MN State Design Day (2024 Demand Entitlement Filing)</u>	784,382	784,382	
5.	- <u>Small & Large Demand Billed Dth (2024 Demand Entitlement Filing)</u>	28,148	28,148	
6.	Non-Demand Billed Design Day Dkt (4 - 5)	756,234	756,234	
7.	Non-Demand Billed Allocation (3 x 6 / 4)	\$42,470,206	\$29,846,932	
8.	Demand Billed Cost Allocation (3 - 7)	\$1,580,796	\$1,110,941	
9.	MN Annual / Seasonal Firm Therm Sales (Forecast)	628,058,653	466,782,718	
10.	Demand Unit Cost \$/Therm (7 / 9)	\$0.06762	\$0.06394	\$0.13156
11.	Demand Cost True-up - Residential, Oct-May			\$0.00000
12.	Demand Cost True-up - Commercial, Oct-May			\$0.00000
13.	Total Demand Rate - Residential (10 +11)			\$0.13156
14.	Total Demand Rate -Commercial (10 + 12)			\$0.13156
<u>Demand Cost (Demand Billed)</u>				
15.	Cost Allocated to Demand Billed (8)	\$1,580,796	\$1,110,941	\$2,691,737
16.	/ <u>Annual Contract Billing Demand (2024 Demand Entitlement Filing)</u>			3,377,760
17.	Monthly Commercial Demand Billed Demand Rate			\$0.79690
<u>Commodity Costs</u>				
18.	NNG Annual/Best Effort/Viking/WBI/Xcel Energy Pk Shv			\$22,908,339
19.	x <u>MN Portion of Monthly Retail Sales</u>			84.37%
20.	MN Portion of Monthly Commodity Costs			\$19,327,765
21.	MN Budgeted Calendar Month Retail Therm Sales			77,682,867
22.	Commodity Unit Cost \$/Therm (20 / 21)			\$0.24880
<u>Total Gas Cost per Therm</u>				
23.	Residential (13 + 22)			\$0.38024
24.	Small & Large Commercial (14 +22)			\$0.38024
25.	Small & Large Demand Billed - Demand (17)			\$0.79690
26.	Small & Large Demand Billed - Commodity; All Interruptible (22)			\$0.24880

*Commodity costs are projected and for illustrative purposed only.

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Northern States Power Company

SUMMARY OF COMPANY HEDGE TRANSACTIONS

2024-2025 Heating Season

Revised from 8/1/24 filing

Protected data is shaded.

Docket No. G002/M-24-271

Contract Demand Entitlements-Petition

REVISÉD Attachment 3, Schedule 1

Page 2 of 2

Transaction Details								Monthly Volumes (Dth)					Summary	
Transaction Date	Hedge Instrument	Counterparty	Premium (\$/Dth)	Call Strike Price	Put Strike Price	Daily Vol (Dth)	Basis Point	November	December	January	February	March	Total Volume (Dth)	Total Dollars
[PROTECTED DATA BEGINS]														
[PROTECTED DATA ENDS]														

CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have this day served copies of the foregoing document on the attached list 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-24-271

Dated this 1st day of November 2024

/s/

Victor Barreiro
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-271_M-24-271
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Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_24-271_M-24-271
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_24-271_M-24-271
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Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-271_M-24-271
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_24-271_M-24-271

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