



414 Nicollet Mall
Minneapolis, MN 55401

November 15, 2021

—Via Electronic Filing—

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

RE: REPLY COMMENTS
NEW BASE COST OF GAS
DOCKET NO. G002/MR-21-679

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this Reply to the November 10, 2021 Comments of the Minnesota Department of Commerce (Department) in the above-referenced docket.

We appreciate the Department's review of our petition. We agree to the Department's recommendation to provide updated cost of gas information in this docket and in Docket No. G002/GR-21-678, our companion natural gas rate case. In addition, we will work with Commission and Department Staff to determine the timing and whether the updated information should be applied to our base cost of gas and our rate case.

Finally, the Department noted that the total gas demand and commodity costs in the base cost of gas petition vary slightly from those provided in the rate case. We confirm that these small differences occur due to rounding. Our proposed base cost of gas rates are calculated as the total demand and commodity dollars divided by usage for each class, and then rounded to six decimal places as shown on our proposed tariff sheets. We used the proposed six-digit base cost of gas rates in calculations in our rate case. In the rate case, the proposed base cost of gas rates (rounded) are multiplied by class usage, resulting in total gas demand and commodity dollars that are \$207 different than if unrounded rates were used in the calculation. Attachment A to this filing provides the calculation of the non-material rounding difference of \$207 noted by the Department.

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) 330-6935 or gail.baranko@xcelenergy.com or Jennifer Roesler at (612) 330-1925 or jennifer.roesler@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

GAIL A. BARANKO
MANAGER, REGULATORY PROJECT MANAGEMENT

Enclosure
c: Service List

Base Cost of Gas Rates - Docket No. G002/MR-21-679

Commodity	Sales - Summer Therms	Sales - Winter Therms	Sales - Total Therms	Commodity Costs	Commodity \$/therm
Residential	94,647,687	294,651,421	389,299,108	\$133,777,268	\$0.343636205023
Commercial Firm	58,801,428	171,215,455	230,016,883	\$78,679,730	\$0.342060676537
Commercial Demand Billed			29,952,241	\$9,819,311	\$0.327832274287
Small Interruptible			16,409,131	\$5,527,865	\$0.336877360889
Medium Interruptible			52,827,627	\$17,293,350	\$0.327354284145
Large Interruptible			25,626,930	\$8,376,463	\$0.326861750343
Total			744,131,919	\$253,473,987	

Demand	Demand Therms	Demand Costs	Demand \$/therm
Annual Demand	619,315,990	\$33,500,802	\$0.054093229241
Winter Demand	465,866,876	\$30,608,424	\$0.065702082136
Demand Billed	3,407,255	\$2,472,399	\$0.725627702840
Total MN Demand		\$66,581,624	

Commodity Cost Calculation Docket No. G002/GR-21-678	Summer Sales Therms	Winter Sales Therms	Total Sales Therms	Commodity \$/therm	Commodity rounded \$/therm	Commodity Costs	Commodity Costs rounded rate	Difference
Residential	94,647,687	294,651,421	389,299,108	\$0.343636205023	\$0.343636000000	\$133,777,268	\$133,777,188	\$80
Small Commercial Firm	10,838,776	40,581,971	51,420,746	\$0.342060676537	\$0.342061000000	\$17,589,015	\$17,589,032	(\$17)
Large Commercial Firm	47,962,652	130,633,484	178,596,136	\$0.342060676537	\$0.342061000000	\$61,090,715	\$61,090,773	(\$58)
Commercial Demand Billed			29,905,854	\$0.327832274287	\$0.327832000000	\$9,804,104	\$9,804,096	\$8
Small Interruptible			16,409,131	\$0.336877360889	\$0.336877000000	\$5,527,865	\$5,527,859	\$6
Medium Interruptible			52,652,479	\$0.327354284145	\$0.327354000000	\$17,236,014	\$17,235,999	\$15
Large Interruptible			25,626,930	\$0.326861750343	\$0.326862000000	\$8,376,463	\$8,376,470	(\$7)
Commercial Demand Billed Gen			46,387	\$0.327832274287	\$0.327832000000	\$15,207	\$15,207	\$0
Medium Interruptible Gen			175,148	\$0.327354284145	\$0.327354000000	\$57,336	\$57,335	\$1
Total			744,131,919			\$253,473,987	\$253,473,959	\$28

Demand Cost Calculation Docket No. G002/GR-21-678	Summer Sales Therms	Winter Sales Therms	Total Sales Therms	Annual Demand \$/therm	Winter Demand \$/therm	Annual Demand rounded \$/therm	Winter Demand rounded \$/therm	Demand Costs	Demand Costs rounded rate	Difference
Residential	94,647,687	294,651,421	389,299,108	\$0.054093229241	\$0.065702082136	\$0.054093000000	\$0.065702000000	\$40,417,658	\$40,417,545	\$113
Small Commercial Firm	10,838,776	40,581,971	51,420,746	\$0.054093229241	\$0.065702082136	\$0.054093000000	\$0.065702000000	\$5,447,834	\$5,447,819	\$15
Large Commercial Firm	47,962,652	130,633,484	178,596,136	\$0.054093229241	\$0.065702082136	\$0.054093000000	\$0.065702000000	\$18,243,734	\$18,243,682	\$52
Commercial Demand Billed - Dmd			3,395,255	\$0.725627702840	\$0.725628000000	\$0.725628000000	\$0.725628000000	\$2,463,691	\$2,463,692	(\$1)
Commercial Demand Billed Gen - Dmd			12,000	\$0.725627702840	\$0.725628000000	\$0.725628000000	\$0.725628000000	\$8,708	\$8,708	(\$0)
Total								\$66,581,624	\$66,581,446	\$179

Total Difference \$207

CERTIFICATE OF SERVICE

I, Crystal Syvertsen, 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/MR-21-679

Dated this 15th day of November 2021

/s/

Crystal Syvertsen
Regulatory Administrator

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