

April 15, 2020

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G002/M-19-498

Dear Mr. Seuffert:

Attached are the Response Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Petition of Northern States Power Company (Xcel or the Company) for Approval of Changes in Contract Demand Entitlements.

These Response Comments are in response to Xcel's Supplemental Filing filed on November 1, 2019. The petitioner on behalf of Xcel is:

Lisa R. Peterson
Manager, Regulatory Analysis
Xcel Energy
414 Nicollet Mall
Minneapolis, Minnesota 55401

To ensure that the record is complete in this docket, the Department provides the following response to Xcel's November 1, 2019 Supplemental Filing. The Department recommends that the Minnesota Public Utilities Commission (Commission) accept the Company's proposed level of demand entitlements and allow Xcel to recover the associated demand costs, subject to possible adjustment through the monthly Purchased Gas Adjustment (PGA) effective November 1, 2019 and January 1, 2020 respectively. The Department is available to respond to any questions the Commission may have on this matter.

Sincerely,

/s/ SACHIN SHAH
Rates Analyst

SS /ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G002/M-19-498

I. INTRODUCTION

Northern States Power Company (NSP, Xcel or the Company) filed a demand entitlement petition (Petition) on August 2, 2019, with the Minnesota Public Utilities Commission (Commission). On October 3, 2019 the Minnesota Department of Commerce, Division of Energy Resources (Department) filed Comments in response to the Company's Petition. In its Comments, the Department stated that it would provide its final recommendations to the Commission after the Company filed its update or supplement on November 1, 2019.

On November 1, 2019, the Company filed its Supplemental Filing which showed the final demand entitlement volumes and costs that would be charged to ratepayers. The Company noted that there were changes to the firm transport entitlement levels since the original August 2, 2019 Petition.

In its Petition, Xcel indicated that the Company planned to "acquire 10,794 Dth/day of delivered supply from a producer/marketer of Viking Gas Transmission (Viking) capacity for December through February, to meet seasonal peaking needs." In its Supplemental Filing, Xcel stated that, due to market conditions, Viking capacity was sold out for full-path transportation. Instead, the Company acquired a delivered supply agreement for 11,000 Dth per day of capacity; approximately 206 Dth per day more than it had originally intended to procure. In its Supplemental Filing, the Company stated the following:

Delivered supply provides a service comparable to holding firm pipeline capacity by obtaining a firm commitment for gas at the Town Border Station (TBS). In this arrangement the gas supplier holds firm transportation capacity on Viking, and commits to deliver gas to NSP at our TBS thereby performing the transportation themselves. In return for this commitment, we agree to pay the supplier a demand charge. Our payment of the demand charge typically offsets some of the demand charge the supplier owes to Viking. As a result a delivered supply contract, then, functions similarly to a pipeline transportation contract. This allows us the assurance of firm gas supply needed to meet our design requirements, while also being cost effective.

As discussed in Comments by the Department, Xcel proposed changes in its demand entitlements that, in total, would have increased costs from all source systems by approximately \$15,628,761. In the Company's Supplemental Filing, Xcel stated that as a result of the changes in Viking capacity (as noted above) costs decreased by approximately \$96,322. This amount is for Minnesota and North Dakota customers. The Minnesota portion of the costs are \$84,349 lower than those reflected in the Petition.

In addition, the Company had a change in circumstance where it had to acquire additional capacity for a short-term. The Company stated the following:

The second cost update stems from a change in customer circumstances. In October a large interruptible customer in Grand Forks indicated a need to move to firm sales service due to a failure of its backup system. To serve the additional requirements, we looked to acquire additional capacity. While Viking is fully subscribed across its system, limited capacity was available from Emerson to Grand Forks at the beginning of Viking's system. As a result, we contracted an additional 1,500 Dth/day of Viking Firm Transportation capacity for a term of one-year. The total cost impact is an additional \$85,512 on an annual basis effective November 1, 2019.

The Department responds to the Supplemental Filing below.

II. DEPARTMENT ANALYSIS

The Department offers the following analysis of the Company's Supplemental Filing, addressing:

- the revised demand entitlement costs,
- the associated Purchased Gas Adjustment (PGA) cost,
- the reserve margin.

A. SUPPLIER ENTITLEMENT CHANGES

As noted above, Xcel originally planned to purchase 10,794 Dekatherms (Dth) per day of delivered supply from a producer/marketer on Viking. The Company acquired a delivered supply agreement for 11,000 Dth per day of capacity. The acquired capacity as part of the delivered supply agreement is 206 Dth per day more than what the Company anticipated at the time it filed its Petition. However, the Company stated that this was due to contracting in round numbers. The changes are provided in detail in the Company's Supplemental Attachments 1 and 2.

The Department concludes that Xcel's proposed supplier entitlement changes appear reasonable.

B. *XCEL'S SECOND COST UPDATE*

In its Supplemental Filing, Xcel indicated that one of its large interruptible customers in Grand Forks had a failure of its backup system and needed to move to firm service. The Department sent Xcel Information Request No. 9 (included as Department Attachment 2) wherein the Company stated, in part, the following:

D. Gas used to serve the customer historically enters the distribution system from the Grand Forks TBS on the Viking Gas Transmission (Viking) system.

E. The customer's move to firm sales service does not change the TBS from which gas will enter into the distribution system. The configuration of the distribution system or its supply point will not change as a result of the customer's service choice.

Thus, based on the Company's answer above it does not appear that there would have been any potential impact to other customers as a result of this particular customer's service choice. In addition, as requested, the Company provided the tariff sheets under which the customer took service prior to and after the change. The tariffs indicate that the customer is located in Grand Forks, North Dakota. See Department Attachment 2.

The Department concludes that Xcel's proposed change described above appears reasonable.

C. *XCEL'S PGA COST RECOVERY PROPOSAL UPDATE*

In its Comments, the Department had described how there were two interstate pipeline rate cases ongoing at the Federal Energy Regulatory Commission (FERC) involving Northern Natural Gas Company (Northern or NNG) and Viking.¹ The Department had also stated the following:

However, Xcel should not implement the retail rate impacts in its PGA "effective with the November 1, 2019 usage" of FERC approved tariffs that are currently "suspended to be effective January 1, 2020, subject to refund." Any changes to NNG rates will not be effective until January 1, 2020; therefore, Xcel's PGA should also not reflect those changes until January 1, 2020. Given that the above Northern changes impact the instant Petition, the Department recommends that Xcel in its November 2019 Supplemental Filing and/or Update provide not only the costs to Xcel of the Northern changes described above both at FERC rates in effect beginning November 1, 2019 but also at the expected rates beginning January 1, 2020 for all the capacity that Xcel has contracted with NNG.^[2]

¹ See the Department's October 3, 2019 Comments at pages 7 through 11.

² Id.

... As with NNG's proposed rate increase, Xcel should not implement the retail rate impacts in its PGA "effective with the November 1, 2019 usage" of FERC approved tariffs that are currently "suspended, to be effective upon motion on January 1, 2020, subject to refund." Given that the above Viking changes impact the instant Petition, the Department recommends that Xcel in its November 2019 Supplemental Filing and/or Update provide not only the costs to Xcel of the Viking changes described above both at FERC rates in effect beginning November 1, 2019 but also at the expected rates beginning January 1, 2020 for all the capacity that Xcel has contracted with VGT.^[3]

On October 14, 2019, Xcel filed Reply Comments in the instant Docket and agreed with the Department's recommendations noted above. Xcel stated the following:⁴

We appreciate and agree with the Department's concerns regarding the implementation of the proposed rates filed in Northern Natural Gas Company and Viking Gas Transmission's respective rate cases. As the Department notes, each pipeline's proposed rates have been suspended by the Federal Energy Regulatory Commission to be effective January 1, 2020. As such, we will provide two expected costs with our supplemental filing; one detailing the costs at current rates effective November 1, 2019 through December 31, 2019, and another to be effective on the implementation of the pipelines' proposed rates effective January 1, 2020 and going forward.

In its Supplemental Comments, Xcel proposed to reflect the costs associated with its proposed demand entitlements in the purchased gas adjustment (PGA) effective November 1, 2019 and January 1, 2020. The demand entitlements in Xcel's Trade Secret Revised Attachment 2, Schedule 1, Page 1 of 3, represent the demand entitlements for which the Company's firm customers will pay. The Company's Revised Attachment 2, Schedule 2 compares the October 2019 PGA costs to the November 2019 PGA costs for several customer classes. The resulting cost changes, related strictly to changes in demand costs, have the following annual rate effects:

- Annual demand costs increase by \$0.0054/Dth, or approximately \$0.47 annually, for the average Residential customer consuming 87 Dth annually;
- Annual demand costs increase by \$0.0054/Dth, or approximately \$1.54 annually, for the average Small Commercial customer consuming 284 Dth annually;

³ Id.

⁴ Xcel Reply Comments, page 1.

- Annual demand costs increase by \$0.0054/Dth, or approximately \$7.90 annually, for the average Large Commercial customer consuming 1,463 Dth annually; and
- No Change in annual demand costs for the average Small Interruptible, Medium Interruptible, and Large Interruptible customers. These customer classes are not allocated demand costs under the current cost allocation plan.

Additionally, the Company's Revised Attachment 2, Schedule 2, effective January 2020, compares the October 2019 PGA costs to the January 2020 PGA costs for several customer classes. The resulting cost changes, related strictly to changes in demand costs, have the following annual rate effects:

- Annual demand costs increase by \$0.2076/Dth, or approximately \$18.05 annually, for the average Residential customer consuming 87 Dth annually;
- Annual demand costs increase by \$0.2139/Dth, or approximately \$60.75 annually, for the average Small Commercial customer consuming 284 Dth annually;
- Annual demand costs increase by \$0.2024/Dth, or approximately \$296.04 annually, for the average Large Commercial customer consuming 1,463 Dth annually; and
- No Change in annual demand costs for the average Small Interruptible, Medium Interruptible, and Large Interruptible customers. These customer classes are not allocated demand costs under the current cost allocation plan.

In its October 14, 2019 Reply Comments the Company had provided clarification regarding the effective and expiration dates of the Great Lakes Gas Transmission (GLGT) agreements as requested by the Department. The Department appreciates the Company's clarification on its GLGT contracts.

As mentioned above and in the Department's Comments, Viking has a rate case pending before FERC in FERC Docket No. RP19-1340. On February 28, 2020 Viking filed a *Stipulation and Offer of Settlement* in FERC Docket No. RP19-1340 and in part stated the following:

Pursuant to Rule 602 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. § 385.602, Viking Gas Transmission Company ("Viking") submits this Stipulation and Offer of Settlement ("Settlement"), which effectuates reductions to Viking's overall rates, provides rate certainty for up to three years, and resolves all issues in this proceeding. The Settlement is supported or not opposed by all parties to this proceeding.¹ Viking, therefore, urges the Commission to approve the Settlement promptly without modification or conditions.

¹ As used herein, "parties" refers to the parties to this Docket No. RP19-1340-000 proceeding. Parties that support or do not oppose the settlement are identified in Appendix C. As used herein, "participants" refers to Commission Trial Staff as well as the parties.

On March 19, 2020, FERC Trial Staff filed their Comments on Viking's *Stipulation and Offer of Settlement* and as of this filing, the matter is now awaiting FERC action. (See Department Attachment 3 for portions of the settlement document).

On December 16, 2019, the Chief Administrative Law Judge at FERC in NNG's FERC rate case in FERC Docket No. RP19-1353 issued an *Order of Chief Judge Terminating Settlement Procedures* and thus, NNG's rate case at FERC is still ongoing. (See Department Attachment 3).

The bill impacts described above relate solely to changes in demand cost and are based on the demand data provided by the Company. As a result of the above Viking and NNG cases at FERC, the demand rates implemented January 1, 2020 are subject to refund and the outcome of the FERC hearings. As a result the demand costs will be subject to a possible future adjustment through the PGA and reflected in the Company's Annual Automatic Adjustment (AAA) Report filed in compliance with Minnesota Rules 7825.2390 through 7825.2920. Thus, based on its review, the Department concludes that the Company's proposal appears to be reasonable.

D. RESERVE MARGIN

As a result of all of Xcel's proposed entitlement changes, the net change to the Company's reserve margin is an increase of 12,969 Dth/day on a Minnesota-jurisdictional basis, resulting in a reserve margin of 6.61%.⁵ This reflects an increase in the reserve margin compared to the 2018-2019 heating season's reserve margin of 6.00%. As discussed in the Department's Comments, the 2019-2020 reserve margin is not unreasonable.

III. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission:

- Approve Xcel's proposed level of demand entitlements as amended by its Supplemental Filing; and
- Allow Xcel to recover associated demand costs through the monthly Purchased Gas Adjustment effective November 1, 2019 and January 1, 2020 respectively.

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⁵ The 6.61% reserve margin is a slight increase from the 6.41% reserve margin reflected in Xcel's initial Petition. See Department Comments Attachment 1.

**Response Comments Department Attachment 1
Docket No. G002/M-19-498
Demand Entitlement Analysis***

	Number of Firm Customers			Design-Day Requirement			Total Entitlement Plus Peak Shaving			Reserve Margin	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Heating Season	Number of Customers	Change from Previous Year	% Change From Previous Year	Design Day (Dth)	Change from Previous Year	% Change From Previous Year	Total Design-Day Capacity (Dth)	Change from Previous Year	% Change From Previous Year	Reserve Margin	% of Reserve Margin [(7)-(4)]/(4)
2019-2020**	465,382	4,304	0.93%	743,696	7,955	1.08%	792,833	12,969	1.66%	49,137	6.61%
2018-2019**	461,078	3,309	0.72%	735,741	5,594	0.77%	779,864	3,566	0.46%	44,123	6.00%
2017-2018**	457,769	3,373	0.74%	730,147	4,922	0.68%	776,298	10,764	1.41%	46,151	6.32%
2016-2017**	454,396	3,766	0.84%	725,225	7,747	1.08%	765,534	3,382	0.44%	40,309	5.56%
2015-2016**	450,630	4,221	0.95%	717,478	1,533	0.21%	762,152	798	0.10%	44,674	6.23%
2014-2015**	446,409	4,836	1.10%	715,945	9,010	1.27%	761,354	12,029	1.61%	45,409	6.34%
2013-2014**	441,573	2,363	0.54%	706,935	4,776	0.68%	749,325	4,078	0.55%	42,390	6.00%
2012-2013**	439,210	155	0.04%	702,159	(135)	-0.02%	745,247	153	0.02%	43,088	6.14%
2011-2012**	439,055	2,461	0.56%	702,294	2,683	0.38%	745,094	1,313	0.18%	42,800	6.09%
2010-2011**	436,594	2,896	0.67%	699,611	5,124	0.74%	743,781	(4,486)	-0.60%	44,170	6.31%
2009-2010**	433,698	4,846	1.13%	694,487	9,482	1.38%	748,267	15,976	2.18%	53,780	7.74%
2008-2009**	428,852	(2,651)	-0.61%	685,005	1,288	0.19%	732,291	10,785	1.49%	47,286	6.90%
2007-2008**	431,503	7,088	1.67%	683,717	5,984	0.88%	721,506	25,249	3.63%	37,789	5.53%
2006-2007	424,415	2,845	0.67%	677,733	6,887	1.03%	696,257	4,568	0.66%	18,524	2.73%
2005-2006	421,570	10,584	2.58%	670,846	21,191	3.26%	691,689	16,569	2.45%	20,843	3.11%
2004-2005	410,986	9,353	2.33%	649,655	46,187	7.65%	675,120	31,805	4.94%	25,465	3.92%
2003-2004	401,633	5,826	1.47%	603,468	(4,388)	-0.72%	643,315	1,040	0.16%	39,847	6.60%
2002-2003	395,807			607,856			642,275			34,419	5.66%
Average:			0.96%			1.21%			1.26%		5.77%

Heating Season	Firm Peak-Day Sendout			Per Customer Metrics			
	(12)	(13)	(14)	(15)	(16)	(17)	(18)
	Firm Peak-Day Sendout (Dth)	Change from Previous Year	% Change From Previous Year	Excess per Customer [(7) - (4)]/(1)	Design Day per Customer (4)/(1)	Entitlement per Customer (7)/(1)	Peak-Day Send per Customer (12)/(1)
2019-2020**	NA			0.1056	1.5980	1.7036	NA
2018-2019**	735,822	(9,309)	-1.25%	0.0957	1.5957	1.6914	1.5959
2017-2018**	745,131	11,420	1.56%	0.1008	1.5950	1.6958	1.6277
2016-2017**	733,711	14,382	2.00%	0.0887	1.5960	1.6847	1.6147
2015-2016**	719,329	31,828	4.63%	0.0991	1.5922	1.6913	1.5963
2014-2015**	687,501	(2,489)	-0.36%	0.1017	1.6038	1.7055	1.5401
2013-2014**	689,990	243	0.04%	0.0960	1.6009	1.6969	1.5626
2012-2013**	689,747	30,484	4.62%	0.0981	1.5987	1.6968	1.5704
2011-2012**	659,263	(16,404)	-2.43%	0.0975	1.5996	1.6970	1.5015
2010-2011	675,667	84,736	14.34%	0.1012	1.6024	1.7036	1.5476
2009-2010	590,931	(10,494)	-1.74%	0.1240	1.6013	1.7253	1.3625
2008-2009	601,425	15,551	2.65%	0.1103	1.5973	1.7076	1.4024
2007-2008	585,874	16,911	2.97%	0.0876	1.5845	1.6721	1.3578
2006-2007	568,963	31,303	5.82%	0.0436	1.5969	1.6405	1.3406
2005-2006	537,660	286	0.05%	0.0494	1.5913	1.6407	1.2754
2004-2005	537,374	(23,876)	-4.25%	0.0620	1.5807	1.6427	1.3075
2003-2004	561,250	26,865	5.03%	0.0992	1.5025	1.6017	1.3974
2002-2003	534,385			0.0870	1.5357	1.6227	1.3501
Average			2.10%	0.0915	1.5874	1.6789	1.4677

*Some numbers may differ from Xcel Attachments due to rounding

**Reflects the UPC DD method.

- Not Public Document – Not For Public Disclosure
 Public Document – Not Public Data Has Been Excised
 Public Document

Xcel Energy Information Request No. 3
Docket No.: G002/M-19-498
Response To: Minnesota Department of Commerce
Requestor: Sachin Shah
Date Received: August 13, 2019

Question:

Topic:

Reference(s): Northern States Power Co., d/b/a Xcel Energy, August 2 Demand Entitlement Filing.

Request:

On page 5 of its Petition, the Company stated the following:

Reflected in this filing are changes in our resources used to meet our DD customer requirements, including entitlements on our pipeline and storage supplier systems: Northern Natural Gas Company, Viking Gas Transmission Company, Great Lakes Gas Transmission Company, ANR Pipeline Company, WBI Energy Transmission, and ANR Storage Company. Depending on the service, these changes take effect at various times during the heating season.

A. For each and all of the pipeline and storage systems referenced above, please separately provide the respective and applicable Federal Energy Regulatory Commission (FERC) approved tariff sheets prior to the changes discussed by the Company in its Petition at Attachment 1 pages 7 through 9 of 10.

Please provide the requested information, in Adobe Acrobat format (*.PDF) with all links and formulae intact. If any of these links target an outside file, please provide all such additional files.

In addition, whenever acronyms are used in the data given in response to all the parts above, please provide an explanation of all acronyms used AND also provide a brief but complete explanation of the source of each data series that is provided.

If this information has already been provided in the application or in response to an earlier Department information request (IR), please identify the specific cite(s) or Department IR numbers(s).

Response:

The tariff sheets are attached as follows:

Attachment A	ANR - Currently Effective
Attachment B	ANR Storage - Currently Effective
Attachment C	Great Lakes - Previously Effective
Attachment D	NNG - Currently Effective
Attachment E	Viking - Currently Effective
Attachment F	WBI - Previously Effective

Please note that the ANR Storage tariff sheets are attached, though no changes to rates have been made or are proposed within the applicable timeframe.

Sources for the attached sheets are as follows;

ANR - <http://anrebb.transcanada.com/>

ANR Storage - <http://www.gasnom.com/ip/anr/>

Great Lakes - <http://www.tcplus.com/Great%20Lakes/Tariff/CurrEffRates>

NNG -

<https://apps.northernnaturalgas.com/Public/Tariff/default.aspx?source=cureffective&index=17>

Viking -

https://vgt.oneokpartners.com/~media/NGP/VGT/Informational%20Postings/Tariff/vgt_tariff.ashx#nameddest=Part5

WBI -

https://transmission.wbienergy.com/Tariff_Documents/Third%20Revised%20Volume%20No.%201.pdf#FT1EffectiveRates

Preparer: Justin Holstein
Title: Senior Analyst
Department: Gas Planning
Telephone: 303-571-2750
Date: August 23, 2019

ANR Pipeline Company
 FERC Gas Tariff
 Third Revised Volume No. 1

4.3 - Statement of Rates
 Rate Schedules FTS-1, FTS-4 & FTS-4L
 v.1.1.0 Superseding v.1.0.0

RATE SCHEDULES FTS-1, FTS-4, FTS-4L
 MATRIX OF BASE TARIFF TRANSMISSION RATES PER DTH BY ROUTE
 EXCLUSIVE OF ADDITIONAL CHARGES OR SURCHARGES

RECEIVED FROM	DELIVERED TO	SOUTHEAST			SOUTHWEST			NORTHERN
		S.E. Area (SE)	Southern Segment (ML-2)	Central Segment (ML-3)	S.W. Area (SW)	Southern Segment (ML-5)	Central Segment (ML-6)	Segment (ML-7)
SOUTHEAST AREA (SE)	- Res	\$ 2.3590	\$ 8.7620	\$11.1210	\$19.8830	\$17.1870	\$15.1650	\$13.1430
	- Cmd	0.0027	0.0142	0.0169	0.0303	0.0236	0.0216	0.0189
	- MIN	0.0027	0.0142	0.0169	0.0303	0.0236	0.0216	0.0189
	- Ovrn	0.0802	0.3022	0.3824	0.6840	0.5887	0.5202	0.4509
SE - Southern (ML-2)	- Res	\$ 8.7620	\$ 6.4030	\$ 8.7620	\$17.5240	\$14.8280	\$12.8060	\$10.7840
	- Cmd	0.0142	0.0115	0.0142	0.0276	0.0209	0.0189	0.0162
	- MIN	0.0142	0.0115	0.0142	0.0276	0.0209	0.0189	0.0162
	- Ovrn	0.3022	0.2220	0.3022	0.6038	0.5083	0.4399	0.3707
SE - Central (ML-3)	- Res	\$11.1210	\$ 8.7620	\$ 6.0660	\$14.8280	\$12.1320	\$10.1100	\$ 8.0880
	- Cmd	0.0169	0.0142	0.0108	0.0243	0.0175	0.0155	0.0128
	- MIN	0.0169	0.0142	0.0108	0.0243	0.0175	0.0155	0.0128
	- Ovrn	0.3824	0.3022	0.2102	0.5117	0.4164	0.3479	0.2788
SOUTHWEST AREA (SW)	- Res	\$19.8830	\$17.5240	\$14.8280	\$ 2.6960	\$ 8.4250	\$10.4470	\$12.4690
	- Cmd	0.0303	0.0276	0.0243	0.0067	0.0169	0.0195	0.0216
	- MIN	0.0303	0.0276	0.0243	0.0067	0.0169	0.0195	0.0216
	- Ovrn	0.6840	0.6038	0.5117	0.0952	0.2939	0.3630	0.4315
SW - Southern (ML-5)	- Res	\$17.1870	\$14.8280	\$12.1320	\$ 8.4250	\$ 5.7290	\$ 7.7510	\$ 9.7730
	- Cmd	0.0236	0.0209	0.0175	0.0169	0.0101	0.0128	0.0148
	- MIN	0.0236	0.0209	0.0175	0.0169	0.0101	0.0128	0.0148
	- Ovrn	0.5887	0.5083	0.4164	0.2939	0.1984	0.2676	0.3362
SW - Central (ML-6)	- Res	\$15.1650	\$12.8060	\$10.1100	\$10.4470	\$ 7.7510	\$ 5.7290	\$ 7.7510
	- Cmd	0.0216	0.0189	0.0155	0.0195	0.0128	0.0108	0.0128
	- MIN	0.0216	0.0189	0.0155	0.0195	0.0128	0.0108	0.0128
	- Ovrn	0.5202	0.4399	0.3479	0.3630	0.2676	0.1991	0.2676
NORTHERN (ML-7)	- Res	\$13.1430	\$10.7840	\$ 8.0880	\$12.4690	\$ 9.7730	\$ 7.7510	\$ 5.7290
	- Cmd	0.0189	0.0162	0.0128	0.0216	0.0148	0.0128	0.0101
	- MIN	0.0189	0.0162	0.0128	0.0216	0.0148	0.0128	0.0101
	- Ovrn	0.4509	0.3707	0.2788	0.4315	0.3362	0.2676	0.1984

General Notes:

All rates shown combine area and segment rates for each route, utilizing the transmission rates set forth in Section 4.12 and represent maximum rates unless designated as minimum firm service rates (MIN).

ANR Pipeline Company
FERC Gas Tariff
Third Revised Volume No. 1

The rates shown are subject to all applicable reservation and volumetric charges or surcharges, under Section 6.24 of the General Terms and Conditions of this Tariff. Sections 4.16 and 4.20 reflect the applicable charges and surcharges under these Sections.

ANR Pipeline Company
FERC Gas Tariff
Third Revised Volume No. 1RATE SCHEDULES FSS & DDS
STATEMENT OF RATES FOR STORAGE OF NATURAL GAS

	Maximum Rate per Dth -----	Minimum Rate per Dth -----
RATE SCHEDULE FSS 1/ For a service term of 1 year or less -----		
With Ratchets and Seasonal Entitlements -----		
1. Reservation Rate		
a. Deliverability Rate	\$ 2.4205	\$ 0
b. Capacity Rate	\$ 0.4746	\$ 0
2. Commodity Rate		
Injection/Withdrawal	\$ 0.0126	\$ 0.0126
3. Overrun Service Rate	2/	\$ 0.0126
With Ratchets and Flexible Entitlements -----		
1. Reservation Rate		
a. Deliverability Rate	\$ 2.9069	\$ 0
b. Capacity Rate	\$ 0.4746	\$ 0
2. Commodity Rate		
Injection/Withdrawal	\$ 0.0126	\$ 0.0126
3. Overrun Service Rate	2/	\$ 0.0126
Without Ratchets and Seasonal Entitlements -----		
1. Reservation Rate		
a. Deliverability Rate	\$ 3.0849	\$ 0
b. Capacity Rate	\$ 0.4746	\$ 0
2. Commodity Rate		
Injection/Withdrawal	\$ 0.0126	\$ 0.0126
3. Overrun Service Rate	2/	\$ 0.0126
Without Ratchets and Flexible Entitlements -----		
1. Reservation Rate		
a. Deliverability Rate	\$ 3.5595	\$ 0
b. Capacity Rate	\$ 0.4746	\$ 0
2. Commodity Rate		
Injection/Withdrawal	\$ 0.0126	\$ 0.0126
3. Overrun Service Rate	2/	\$ 0.0126

ANR Pipeline Company
FERC Gas Tariff
Third Revised Volume No. 1

RATE SCHEDULE FSS 1/

For a service term of greater than 1 year up to and including 3 years

With Ratchets and Seasonal Entitlements

1. Reservation Rate		
a. Deliverability Rate	\$ 2.0400	\$ 0
b. Capacity Rate	\$ 0.4000	\$ 0
2. Commodity Rate		
Injection/Withdrawal	\$ 0.0126	\$ 0.0126
3. Overrun Service Rate	2/	\$ 0.0126

With Ratchets and Flexible Entitlements

1. Reservation Rate		
a. Deliverability Rate	\$ 2.4500	\$ 0
b. Capacity Rate	\$ 0.4000	\$ 0
2. Commodity Rate		
Injection/Withdrawal	\$ 0.0126	\$ 0.0126
3. Overrun Service Rate	2/	\$ 0.0126

Without Ratchets and Seasonal Entitlements

1. Reservation Rate		
a. Deliverability Rate	\$ 2.6000	\$ 0
b. Capacity Rate	\$ 0.4000	\$ 0
2. Commodity Rate		
Injection/Withdrawal	\$ 0.0126	\$ 0.0126
3. Overrun Service Rate	2/	\$ 0.0126

Without Ratchets and Flexible Entitlements

1. Reservation Rate		
a. Deliverability Rate	\$ 3.0000	\$ 0
b. Capacity Rate	\$ 0.4000	\$ 0
2. Commodity Rate		
Injection/Withdrawal	\$ 0.0126	\$ 0.0126
3. Overrun Service Rate	2/	\$ 0.0126

RATE SCHEDULE FSS 1/

For a service term of greater than 3 years

With Ratchets and Seasonal Entitlements

1. Reservation Rate		
a. Deliverability Rate	\$ 2.0349	\$ 0
b. Capacity Rate	\$ 0.3990	\$ 0

Issued: January 13, 2017
Effective: April 1, 2017Docket No. RP17-335-000
Accepted: February 3, 2017

ANR Pipeline Company
 FERC Gas Tariff
 Third Revised Volume No. 1

2. Commodity Rate		
Injection/Withdrawal	\$ 0.0126	\$ 0.0126
3. Overrun Service Rate	2/	\$ 0.0126

With Ratchets and Flexible Entitlements

1. Reservation Rate		
a. Deliverability Rate	\$ 2.4439	\$ 0
b. Capacity Rate	\$ 0.3990	\$ 0
2. Commodity Rate		
Injection/Withdrawal	\$ 0.0126	\$ 0.0126
3. Overrun Service Rate	2/	\$ 0.0126

Without Ratchets and Seasonal Entitlements

1. Reservation Rate		
a. Deliverability Rate	\$ 2.5935	\$ 0
b. Capacity Rate	\$ 0.3990	\$ 0
2. Commodity Rate		
Injection/Withdrawal	\$ 0.0126	\$ 0.0126
3. Overrun Service Rate	2/	\$ 0.0126

Without Ratchets and Flexible Entitlements

1. Reservation Rate		
a. Deliverability Rate	\$ 2.9925	\$ 0
b. Capacity Rate	\$ 0.3990	\$ 0
2. Commodity Rate		
Injection/Withdrawal	\$ 0.0126	\$ 0.0126
3. Overrun Service Rate	2/	\$ 0.0126

RATE SCHEDULE DDS 3/

1. Storage Commodity Rate	\$ 0.0874	\$ 0.0126
---------------------------	-----------	-----------

1/ The rates shown are subject to all applicable reservation and volumetric charges or surcharges, under Section 6.24 of the General Terms and Conditions of this Tariff. Section 4.16 reflects the applicable charges and surcharges under these Sections.

2/ 100% load factor rate, which is the sum of (a) the product of (1) the Deliverability Reservation Rate, (2) twelve, and (3) the Base Maximum Daily Withdrawal Quantity divided by the Maximum Storage Quantity, (b) the Capacity Reservation Rate and (c) the Injection/Withdrawal Commodity Rate.

3/ The rates shown are subject to all applicable volumetric charges or surcharges, under Section 6.24 of the General Terms and Conditions of this Tariff. Section 4.16 reflects the applicable charges and surcharges under these Sections.

ANR Storage Company
 FERC Gas Tariff
 First Revised Volume No. 1

PART 4.1
 4.1 - Statement of Rates
 FS, IS Rates and ACA Surcharges
 v.9.0.0 Superseding v.8.0.0

STATEMENT OF RATES FOR STORAGE OF NATURAL GAS (6)

RATE SCHEDULE FS -----	Maximum Rate per Dth -----	Minimum Rate per Dth -----
1. Reservation Rate		
a. Deliverability – Monthly	\$ 1.09240	\$ 0
b. Capacity – Monthly	\$ 0.01325	\$ 0
c. Deliverability - Daily (3)(4)	\$ 0.03591	\$ 0
d. Capacity - Daily (3)(4)	\$ 0.00044	\$ 0

2. Injection/Withdrawal Commodity Rate	\$ 0.02561	\$ 0.02561
3. Overrun Service Rate (1)	\$ 0.04951	\$ 0.02561

RATE SCHEDULE IS -----	Maximum Rate per Dth -----	Minimum Rate per Dth -----
1. Commodity Rate	\$ 0.04951	\$ 0.02561

SURCHARGE APPLICABLE TO FS AND IS SERVICE (2) -----	Maximum Rate per Dth -----	Minimum Rate per Dth -----
1. ACA	(5)	(5)

Rate Schedules FS and IS

Seller's Injection Use	0.7 %
Seller's Withdrawal Use	0.8 %

- (1) See Section 5.1.4.2 of Rate Schedule FS for definition.
- (2) See Section 5.1.5 of Rate Schedule FS and Section 5.2.5 of Rate Schedule IS for applicability.
- (3) Rates applicable for Volumetric Rate Capacity Release.
- (4) See Section 6.1 paragraph 9 of the General Terms and Conditions of this Tariff.
- (5) The currently effective ACA unit charge as published on the Commission's website (www.ferc.gov) is incorporated herein by reference.
- (6) Subject to the terms of the June 16, 2016 Stipulation and Agreement filed by Seller.

Great Lakes Gas Transmission Limited Partnership
FERC Gas Tariff
Third Revised Volume No. 1

GREAT LAKES GAS TRANSMISSION LIMITED PARTNERSHIP

Open Access Rates

Firm Transportation Service

Rate Schedule FT 6/

	Western Zone 1/ 2/ 3/ Deliveries	Central Zone 1/ 2/ 3/ Deliveries	Eastern Zone 1/ 2/ 3/ Deliveries
Receipts in Western Zone - -----	(Rates per Dth)	(Rates per Dth)	(Rates per Dth)
Reservation Fee	\$2.810	\$4.680	\$8.353
Utilization Fee	0.00288	0.00544	0.00954
Max. Volumetric Rate at 100% L.F. 4/ 5/	0.09238	0.15386	0.27462
Receipts in Central Zone - -----			
Reservation Fee	\$4.680	\$2.414	\$6.087
Utilization Fee	0.00544	0.00256	0.00666
Max. Volumetric Rate at 100% L.F. 4/ 5/	0.15386	0.07936	0.20012
Receipts in Eastern Zone - -----			
Reservation Fee	\$8.353	\$6.087	\$4.217
Utilization Fee	0.00954	0.00666	0.00410
Max. Volumetric Rate at 100% L.F. 4/ 5/	0.27462	0.20012	0.13864

Limited Firm Transportation Service

Rate Schedule LFT 1/ 2/ 3/ 4/ 5/ 6/

The rates shown above for Service under Rate Schedule FT shall also be applicable to Service under Rate Schedule LFT except that the maximum Reservation Fee shall be adjusted to reflect the appropriate number of Days that Service shall be available utilizing the following formula, rounded to 3 decimal places: $LFT = FT \times ((TD - UD)/TD)$ where:

LFT = LFT Reservation Fee
 FT = Applicable FT Reservation Fee
 TD = Number of Days during Agreement Term
 UD = Number of Unavailable Days

Great Lakes Gas Transmission Limited Partnership
FERC Gas Tariff
Third Revised Volume No. 1

Expedited Firm Transportation Service
Rate Schedule EFT 1/ 2/ 3/ 4/ 5/ 6/

The rates shown above for Service under Rate Schedule FT shall also be applicable to Service under Rate Schedule EFT except that the maximum Reservation Fee shall be adjusted to reflect the applicable expedited period of gas flow (EPF) utilizing the following formula, rounded to 3 decimal places: $EFT = FT \times (24/EPF)$ where:

EFT = EFT Reservation Fee
FT = Applicable FT Reservation Fee
24 = Number of Hours in a Gas Day
EPF = MDQ/MHQ

- 1/ Pursuant to Section 5.1.5 paragraph 2 of Rate Schedules FT, Section 5.2.5 paragraph 2 of Rate Schedule EFT, and Section 5.3.5 paragraph 2 of Rate Schedule LFT, Shipper shall pay, in addition to the rate specified for this service, an ACA charge set forth in Section 4.6 of this FERC Gas Tariff.
- 2/ The minimum charge for Reservation Fees, backhauls and/or exchange transportation shall be \$0.00 per Dth.
- 3/ In addition, Shipper shall pay the 100% load factor rate for the service outside the zones for which a Reservation Fee or Volumetric Rate is paid.
- 4/ In addition to the Volumetric Rate, the Utilization Fee is applicable to all services.
- 5/ 100% load factor rate is calculated as: $(\text{Reservation Fee} \times 12)/365$, rounded to 5 decimal places.
- 6/ Seasonal recourse rates apply to short-term firm ("STF") service (i.e., firm service that has a term of less than one year and that does not include multiple-year seasonal service) under Rate Schedule FT and rate schedules that are based upon Rate Schedule FT rates, in addition to interruptible transportation service under Rate Schedule IT. On or before February 15 of each year, Great Lakes shall identify the number of peak months (from zero to five) for the upcoming 12-month period beginning April 1, identify the months to which peak rates apply; and set the peak rate multiplier from one up to a maximum of 1.4. Peak rates will be set by multiplying the applicable firm reservation charge (or reservation component) by the peak multiplier. The remaining off-peak months will have a multiplier equal to $1 - (P/O) \times (M - 1)$ where:
P=Peak Months
O=Off-Peak Months (Equal to 12-P)
M=Multiplier for Peak Months

Transporter's seasonal recourse rate elections and resulting peak and off-peak rates shall be posted under the Informational Postings section of Transporter's Internet Website.

Northern Natural Gas Company
 FERC Gas Tariff
 Sixth Revised Volume No. 1

Fourteenth Revised Sheet No. 50
 Superseding
 Thirteenth Revised Sheet No. 50

RATE SCHEDULE TF

RESERVATION RATES	MARKET-TO-MARKET			FIELD-TO-FIELD/MARKET DEMARCATION
	TF12 Base	TF12 Variable	TF5	TFF
Base Tariff Rates 1/				
Summer (Apr-Oct)	5.683	5.683	-0-	5.473
Winter (Nov-Mar)	10.230	13.866	15.153	9.853

COMMODITY RATES 2/		Market Area 3/ 6/		Field Mileage 5/		Carlton Surcharge 4/		Out-of Balance 3/	
TF12 Base, TF12 Var., TF5 & TFF		Maximum	Minimum	Maximum	Minimum	Maximum	Minimum	Maximum	Minimum
Receipt Point	Delivery Point								
Market	Market	0.0366	0.0197			0.0175	0.0000	0.0366	0.0197
Field	Market	0.0366	0.0197	0.0122	0.0040	0.0175	0.0000		
Market	Field			0.0122	0.0040				
Field	Field			0.0122	0.0040			0.0276	0.0090

- 1/ The minimum reservation rate is equal to zero.
- 2/ The applicable Mileage Indicator Districts (MIDs) billing rate will be added to the TF rates for volumes received in the Field Area, or received in the Market Area and delivered to the Field Area. The MIDs rates shown on Sheet Nos. 59-60A represent the maximum Field Area throughput commodity rates for any transaction involving MIDs.
- 3/ The Maximum and Minimum rates include the Market Area Electric Compression charge of \$0.0007 where applicable. In addition, Shipper shall pay the ACA unit surcharge as posted on FERC's website at <http://www.ferc.gov>.
- 4/ Applicable to Market Area shippers as provided for in the Carlton Settlement filed in Docket No. RP96-347 dated October 28, 1996.
- 5/ Where applicable, the Field Area Electric Compression charge of \$0.0000 and the ACA unit surcharge as set forth on FERC's website at <http://www.ferc.gov> will be added to the mileage based rates.
- 6/ There will be no commodity charge for transportation from the Ventura pooling point (POI 78623) to the NBPL/NNG Ventura point (POI 192) and from the Ventura pooling point (POI 78623) to the MID 17 pooling point (POI 71458). In addition, there will be no commodity charge for transportation as set forth in Sheet Nos. 141, 142C and 147.

Northern Natural Gas Company
 FERC Gas Tariff
 Sixth Revised Volume No. 1

Seventeenth Revised Sheet No. 51
 Superseding
 Sixteenth Revised Sheet No. 51

RATE SCHEDULE TFX

RESERVATION RATES	MARKET-TO-MARKET		FIELD-TO-FIELD	
	Apr-Oct	Nov-Mar	Apr-Oct	Nov-Mar
Base Tariff Rates 1/	\$5.683	\$15.153	\$5.473	\$9.853

COMMODITY RATES 2/		Market Area 3/ 6/		Field Mileage 5/		Carlton		Out-of-Balance 3/	
TFX		Maximum	Minimum	Maximum	Minimum	Maximum	Minimum	Maximum	Minimum
Receipt Point	Delivery Point			Rate per 100 miles		Surcharge 4/			
Market	Market	0.0366	0.0197			0.0175	0.0000	0.0366	0.0197
Field	Market	0.0366	0.0197	0.0122	0.0040	0.0175	0.0000		
Market	Field			0.0122	0.0040				
Field	Field			0.0122	0.0040			0.0276	0.0090

- 1/ The minimum reservation rate is equal to zero.
- 2/ The applicable Mileage Indicator Districts (MIDs) billing rate will be added to the TF rates for volumes received in the Field Area, or received in the Market Area and delivered to the Field Area. The MIDs rates shown on Sheet Nos. 59-60A represent the maximum Field Area throughput commodity rates for any transaction involving MIDs.
- 3/ The Maximum and Minimum rates include the Market Area Electric Compression charge of \$0.0007 where applicable. In addition, Shipper shall pay the ACA unit surcharge as posted on FERC's website at <http://www.ferc.gov>.
- 4/ Applicable to Market Area shippers as provided for in the Carlton Settlement filed in Docket No. RP96-347 dated October 28, 1996.
- 5/ Where applicable, the Field Area Compression charge of \$0.0000 and the ACA unit surcharge as set forth on FERC's website at <http://www.ferc.gov> will be added to the mileage based rates.
- 6/ There will be no commodity charge for transportation from the Ventura pooling point (POI 78623) to the NBPL/NNG Ventura point (POI 192) and from the Ventura pooling point (POI 78623) to the MID 17 pooling point (POI 71458). In addition, there will be no commodity charge for transportation as set forth in Sheet Nos. 141, 142C and 147.

Northern Natural Gas Company
 FERC Gas Tariff
 Sixth Revised Volume No. 1

First Revised Sheet No. 55
 Superseding
 Original Sheet No. 55

RATE SCHEDULES FDD, PDD, IDD, ILD & SMS

Rate Schedule FDD

Maximum Reservation Fee	1.7140	1/
Maximum Capacity Fee	0.3567	1/
Injection Charge - Firm	0.0149	
Withdrawal Charge - Firm	0.0149	
Annual Rollover Fee	0.3567	1/

Rate Schedule PDD

Maximum Capacity Fee	0.3567	1/
Maximum Monthly Inventory Charge	0.0887	1/
Injection Charge	0.0149	
Withdrawal Charge	0.0149	
Annual Rollover Fee	0.3567	1/

Rate Schedule IDD

Maximum Monthly Inventory Charge	0.0887	1/
Injection Charge	0.0149	
Withdrawal Charge	0.0149	
Annual Rollover Fee	0.3567	1/

Rate Schedule ILD

Maximum Charge	11.7500
Minimum Charge	0.5044
Performance Obligation Charge	2.0000

Rate Schedule SMS

Reservation Fee	2.1800
Commodity Rate	0.0208

1/ Minimum Rate is zero.

Viking Gas Transmission Company
 FERC Gas Tariff
 Volume No. 1

Part 5.0
 Statement of Rates
 v. 33.0.0 superseding v. 32.0.0
 Page 1 of 3

STATEMENT OF RATES
 (Rates Per Dekatherm)

Currently Effective Term-Differentiated Rates

Rate Schedule	Base Tariff Rate
<u>Category 1 (Contract Term of Less than 3 Years)</u>	
Monthly Reservation Rates	
FT-A	
Zone 1-1 Maximum Rate	\$4.7507
Zone 1-1 Minimum Rate	\$0.0000
Zone 1-2 Maximum Rate 1/	\$5.7394
Zone 1-2 Minimum Rate	\$0.0000
Zone 2-2 Maximum Rate	\$3.3143
Zone 2-2 Minimum Rate	\$0.0000
<u>Category 2 (Contract Term of 3 Years to less than 5 Years)</u>	
Monthly Reservation Rates	
FT-A	
Zone 1-1 Maximum Rate	\$4.5607
Zone 1-1 Minimum Rate	\$0.0000
Zone 1-2 Maximum Rate	\$5.5494
Zone 1-2 Minimum Rate	\$0.0000
Zone 2-2 Maximum Rate	\$3.1243
Zone 2-2 Minimum Rate	\$0.0000
<u>Category 3 (Contract Term of 5 or more Years)</u>	
Monthly Reservation Rates	
FT-A	
Zone 1-1 Maximum Rate	\$4.3706
Zone 1-1 Minimum Rate	\$0.0000
Zone 1-2 Maximum Rate	\$5.3593
Zone 1-2 Minimum Rate	\$0.0000
Zone 2-2 Maximum Rate	\$2.9343
Zone 2-2 Minimum Rate	\$0.0000

1/ Throughout Viking's Statement of Rates and Tariff, "Zone 1-2" shall mean Transportation Service for quantities received in Zone 1 and delivered in Zone 2 or received in Zone 2 and delivered in Zone 1 whether by transport, exchange, or Displacement.

WBI Energy Transmission, Inc.
 FERC Gas Tariff
 Third Revised Volume No. 1

Thirteenth Revised Sheet No. 12
 Superseding
 Twelfth Revised Sheet No. 12

NOTICE OF CURRENTLY EFFECTIVE RATES

(ALL RATES ARE STATED IN CENTS PER DEKATHERM OR EQUIVALENT DEKATHERM AS INDICATED)

RATE SCHEDULE	UNIT	BASE TARIFF RATE	TOP THROUGHPUT SURCHARGE	GAS SUPPLY REALIGNMENT SURCHARGE	BASE TARIFF RATE PLUS SURCHARGES
RATE SCHEDULE FT-1					
RESERVATION CHARGE					
MAXIMUM DAILY DELIVERY QUANTITY (MDDQ)					
MAXIMUM	RATE PER EQV. DKT PER MO.	921.000	N.A.	N.A.	921.000
MINIMUM	RATE PER EQV. DKT PER MO	0.000	N.A.	N.A.	0.000
COMMODITY CHARGE					
MAXIMUM A/B/C/	RATE PER DKT	2.842	N.A.	N.A.	2.842
MINIMUM A/B/C/	RATE PER DKT	2.842	N.A.	N.A.	2.842
SCHEDULED OVERRUN CHARGE					
MAXIMUM A/B/C/	RATE PER DKT	32.112	N.A.	N.A.	32.112
MINIMUM A/B/C/	RATE PER DKT	2.842	N.A.	N.A.	2.842
VOLUMETRIC CAPACITY RELEASE CHARGE					
MAXIMUM	RATE PER DKT	30.279	N.A.	N.A.	30.279
MINIMUM	RATE PER DKT	0.000	N.A.	N.A.	0.000

- A/ SHIPPER MUST REIMBURSE TRANSPORTER IN-KIND FOR TRANSPORTATION FUEL USE AND LOST AND UNACCOUNTED FOR GAS. THE APPLICABLE PERCENTAGES ARE REFLECTED ON SHEET NO. 21A. THESE PERCENTAGES SHALL BE APPLIED TO THE APPLICABLE QUANTITIES OF GAS TENDERED TO TRANSPORTER FOR SHIPPER'S ACCOUNT AT THE RECEIPT POINT(S) INTO TRANSPORTER'S TRANSMISSION FACILITIES.
- B/ SHIPPER MUST REIMBURSE TRANSPORTER FOR ELECTRIC POWER USED FOR TRANSPORTATION. THE APPLICABLE RATE IS REFLECTED ON SHEET NO. 21B. THIS RATE SHALL BE APPLIED TO THE APPLICABLE QUANTITIES OF GAS TENDERED TO TRANSPORTER FOR SHIPPER'S ACCOUNT AT THE RECEIPT POINT(S) INTO TRANSPORTER'S TRANSMISSION FACILITIES.
- C/ SHIPPER MUST REIMBURSE TRANSPORTER FOR THE ACA SURCHARGE. SUCH SURCHARGE SHALL BE THE ACA UNIT CHARGE SPECIFIED IN THE ANNUAL NOTICE ISSUED BY THE FERC ENTITLED "FY [YEAR] GAS ANNUAL CHARGES CORRECTION FOR ANNUAL CHARGES UNIT CHARGE."

Issued On: February 27, 2015
 Docket Number: RP15-540-000
 FERC Order Date: March 18, 2015

Effective On: April 1, 2015

- Not Public Document – Not For Public Disclosure
 Public Document – Not Public Data Has Been Excised
 Public Document

Xcel Energy Information Request No. 5
Docket No.: G002/M-19-498
Response To: Minnesota Department of Commerce
Requestor: Sachin Shah
Date Received: August 13, 2019

Question:

Topic:

Reference(s): Northern States Power Co., d/b/a Xcel Energy, August 2 Demand Entitlement Filing.

Request:

On Attachment 1 page 7 of 10, in its Petition, the Company stated the following:

3. Change in Interstate Pipeline Tariff Rates
 - ... b. Change in GLGT Tariff Rates (effective February 1, 2019)
 - ... c. Change in WBI Tariff Rates (effective May 1, 2019)
 - ... d. Change in Viking Tariff Rates (effective January 1, 2020)
 - ... e. Change in Northern Tariff Rates (effective January 1, 2020)

A. Please provide the above referenced tariff sheets.

Please provide the requested information, in Adobe Acrobat format (*.PDF) with all links and formulae intact. If any of these links target an outside file, please provide all such additional files.

If this information has already been provided in the application or in response to an earlier Department information request (IR), please identify the specific cite(s) or Department IR numbers(s).

Response:

The above-referenced tariff sheets are attached as follows:

- Attachment A** GLGT Tariff Pages Effective February 1, 2019
Attachment B WBI Tariff Pages Effective May 1, 2019

Attachment C Viking Gas Tariff Pages Effective January 1, 2020
Attachment D Northern Tariff Pages Effective January 1, 2020

Viking filed a General Section 4 Rate Case with the Federal Energy Regulatory Commission (FERC) on June 28, 2019 including tariff sheets to be effective August 1, 2019. Northern Natural Gas (Northern) filed a General Section 4 Rate Case with FERC on July 1, 2019 include tariff sheets to be effective August 1, 2019. On July 31, 2019 FERC issued orders in each case accepting and suspending the rates to be effective January 1, 2020 subject to refund. Accordingly, while the attached tariff sheets reflect an effective date of August 1, 2019, the actual rate change will occur on January 1, 2020.

Preparer: Justin Holstein
Title: Senior Analyst
Department: Gas Planning
Telephone: 303-571-2750
Date: August 23, 2019

Great Lakes Gas Transmission Limited Partnership
 FERC Gas Tariff
 Third Revised Volume No. 1

PART 4.1
 4.1 - Statement of Rates
 Rate Schedules FT, LFT & EFT
 v.8.0.0 Superseding v.7.0.0

GREAT LAKES GAS TRANSMISSION LIMITED PARTNERSHIP

Open Access Rates

Firm Transportation Service

Rate Schedule FT 6/

	Western Zone 1/ 2/ 3/ Deliveries	Central Zone 1/ 2/ 3/ Deliveries	Eastern Zone 1/ 2/ 3/ Deliveries
	(Rates per Dth)	(Rates per Dth)	(Rates per Dth)
Receipts in Western Zone -			
Reservation Fee	\$2.754	\$4.586	\$8.186
Utilization Fee	0.00288	0.00544	0.00954
Max. Volumetric Rate at 100% L.F. 4/ 5/	0.09054	0.15079	0.26913
Receipts in Central Zone -			
Reservation Fee	\$4.586	\$2.366	\$5.965
Utilization Fee	0.00544	0.00256	0.00666
Max. Volumetric Rate at 100% L.F. 4/ 5/	0.15079	0.07778	0.19612
Receipts in Eastern Zone -			
Reservation Fee	\$8.186	\$5.965	\$4.133
Utilization Fee	0.00954	0.00666	0.00410
Max. Volumetric Rate at 100% L.F. 4/ 5/	0.26913	0.19612	0.13587

Limited Firm Transportation Service

Rate Schedule LFT 1/ 2/ 3/ 4/ 5/ 6/

The rates shown above for Service under Rate Schedule FT shall also be applicable to Service under Rate Schedule LFT except that the maximum Reservation Fee shall be adjusted to reflect the appropriate number of Days that Service shall be available utilizing the following formula, rounded to 3 decimal places: $LFT = FT \times ((TD - UD)/TD)$ where:

LFT = LFT Reservation Fee
 FT = Applicable FT Reservation Fee
 TD = Number of Days during Agreement Term
 UD = Number of Unavailable Days

Great Lakes Gas Transmission Limited Partnership
 FERC Gas Tariff
 Third Revised Volume No. 1

Expedited Firm Transportation Service
 Rate Schedule EFT 1/ 2/ 3/ 4/ 5/ 6/

 The rates shown above for Service under Rate Schedule FT shall also be applicable to Service under Rate Schedule EFT except that the maximum Reservation Fee shall be adjusted to reflect the applicable expedited period of gas flow (EPF) utilizing the following formula, rounded to 3 decimal places: $EFT = FT \times (24/EPF)$ where:

EFT = EFT Reservation Fee
 FT = Applicable FT Reservation Fee
 24 = Number of Hours in a Gas Day
 EPF = MDQ/MHQ

-
- 1/ Pursuant to Section 5.1.5 paragraph 2 of Rate Schedules FT, Section 5.2.5 paragraph 2 of Rate Schedule EFT, and Section 5.3.5 paragraph 2 of Rate Schedule LFT, Shipper shall pay, in addition to the rate specified for this service, an ACA charge set forth in Section 4.6 of this FERC Gas Tariff.
 - 2/ The minimum charge for Reservation Fees, backhauls and/or exchange transportation shall be \$0.00 per Dth.
 - 3/ In addition, Shipper shall pay the 100% load factor rate for the service outside the zones for which a Reservation Fee or Volumetric Rate is paid.
 - 4/ In addition to the Volumetric Rate, the Utilization Fee is applicable to all services.
 - 5/ 100% load factor rate is calculated as: $(\text{Reservation Fee} \times 12)/365$, rounded to 5 decimal places.
 - 6/ Seasonal recourse rates apply to short-term firm ("STF") service (i.e., firm service that has a term of less than one year and that does not include multiple-year seasonal service) under Rate Schedule FT and rate schedules that are based upon Rate Schedule FT rates, in addition to interruptible transportation service under Rate Schedule IT. On or before February 15 of each year, Great Lakes shall identify the number of peak months (from zero to five) for the upcoming 12-month period beginning April 1, identify the months to which peak rates apply; and set the peak rate multiplier from one up to a maximum of 1.4. Peak rates will be set by multiplying the applicable firm reservation charge (or reservation component) by the peak multiplier. The remaining off-peak months will have a multiplier equal to $1 - (P/O) \times (M - 1)$ where:
 P=Peak Months
 O=Off-Peak Months (Equal to 12-P)
 M=Multiplier for Peak Months

Transporter's seasonal recourse rate elections and resulting peak and off-peak rates shall be posted under the Informational Postings section of Transporter's Internet Website.

WBI Energy Transmission, Inc.
 FERC Gas Tariff
 Third Revised Volume No. 1

Fifteenth Revised Sheet No. 12
 Superseding
 Substitute Fourteenth Revised Sheet No. 12

NOTICE OF CURRENTLY EFFECTIVE RATES

(ALL RATES ARE STATED IN CENTS PER DEKATHERM OR EQUIVALENT DEKATHERM AS INDICATED)

RATE SCHEDULE	UNIT	BASE TARIFF RATE	TOP THROUGHPUT SURCHARGE	GAS SUPPLY REALIGNMENT SURCHARGE	BASE TARIFF RATE PLUS SURCHARGES

RATE SCHEDULE FT-1					

RESERVATION CHARGE					
MAXIMUM DAILY DELIVERY QUANTITY (MDDQ)					
MAXIMUM	RATE PER EQV. DKT PER MO.	984.165	N.A.	N.A.	984.165
MINIMUM	RATE PER EQV. DKT PER MO	0.000	N.A.	N.A.	0.000
COMMODITY CHARGE					
MAXIMUM A/B/C/	RATE PER DKT	2.477	N.A.	N.A.	2.477
MINIMUM A/B/C/	RATE PER DKT	2.477	N.A.	N.A.	2.477
SCHEDULED OVERRUN CHARGE					
MAXIMUM A/B/C/	RATE PER DKT	34.367	N.A.	N.A.	34.367
MINIMUM A/B/C/	RATE PER DKT	2.477	N.A.	N.A.	2.477
VOLUMETRIC CAPACITY RELEASE CHARGE					
MAXIMUM	RATE PER DKT	32.356	N.A.	N.A.	32.356
MINIMUM	RATE PER DKT	0.000	N.A.	N.A.	0.000

-
- A/ SHIPPER MUST REIMBURSE TRANSPORTER IN-KIND FOR TRANSPORTATION FUEL USE AND LOST AND UNACCOUNTED FOR GAS. THE APPLICABLE PERCENTAGES ARE REFLECTED ON SHEET NO. 21A. THESE PERCENTAGES SHALL BE APPLIED TO THE APPLICABLE QUANTITIES OF GAS TENDERED TO TRANSPORTER FOR SHIPPER'S ACCOUNT AT THE RECEIPT POINT(S) INTO TRANSPORTER'S TRANSMISSION FACILITIES.
 - B/ SHIPPER MUST REIMBURSE TRANSPORTER FOR ELECTRIC POWER USED FOR TRANSPORTATION. THE APPLICABLE RATE IS REFLECTED ON SHEET NO. 21B. THIS RATE SHALL BE APPLIED TO THE APPLICABLE QUANTITIES OF GAS TENDERED TO TRANSPORTER FOR SHIPPER'S ACCOUNT AT THE RECEIPT POINT(S) INTO TRANSPORTER'S TRANSMISSION FACILITIES.
 - C/ SHIPPER MUST REIMBURSE TRANSPORTER FOR THE ACA SURCHARGE. SUCH SURCHARGE SHALL BE THE ACA UNIT CHARGE SPECIFIED IN THE ANNUAL NOTICE ISSUED BY THE FERC ENTITLED "FY [YEAR] GAS ANNUAL CHARGES CORRECTION FOR ANNUAL CHARGES UNIT CHARGE."

Issued On: May 28, 2019
 Docket Number: RP19-165-003
 FERC Order Date: May 30, 2019

Effective On: May 1, 2019

Viking Gas Transmission Company
 FERC Gas Tariff
 Volume No. 1

STATEMENT OF RATES
 (Rates Per Dekatherm)

Currently Effective Term-Differentiated Rates

Rate Schedule	Base Tariff Rate
<u>Category 1 (Contract Term of Less than 3 Years)</u>	
Monthly Reservation Rates	
FT-A	
Zone 1-1 Maximum Rate	\$4.8293
Zone 1-1 Minimum Rate	\$0.0000
Zone 1-2 Maximum Rate 1/	\$5.8180
Zone 1-2 Minimum Rate	\$0.0000
Zone 2-2 Maximum Rate	\$3.3929
Zone 2-2 Minimum Rate	\$0.0000
<u>Category 2 (Contract Term of 3 Years to less than 5 Years)</u>	
Monthly Reservation Rates	
FT-A	
Zone 1-1 Maximum Rate	\$4.7473
Zone 1-1 Minimum Rate	\$0.0000
Zone 1-2 Maximum Rate	\$5.7360
Zone 1-2 Minimum Rate	\$0.0000
Zone 2-2 Maximum Rate	\$3.3109
Zone 2-2 Minimum Rate	\$0.0000
<u>Category 3 (Contract Term of 5 or more Years)</u>	
Monthly Reservation Rates	
FT-A	
Zone 1-1 Maximum Rate	\$4.6653
Zone 1-1 Minimum Rate	\$0.0000
Zone 1-2 Maximum Rate	\$5.6540
Zone 1-2 Minimum Rate	\$0.0000
Zone 2-2 Maximum Rate	\$3.2289
Zone 2-2 Minimum Rate	\$0.0000

1/ Throughout Viking's Statement of Rates and Tariff, "Zone 1-2" shall mean Transportation Service for quantities received in Zone 1 and delivered in Zone 2 or received in Zone 2 and delivered in Zone 1 whether by transport, exchange, or Displacement.

Northern Natural Gas Company
 FERC Gas Tariff
 Sixth Revised Volume No. 1

Fifteenth Revised Sheet No. 50
 Superseding
 Fourteenth Revised Sheet No. 50

RATE SCHEDULE TF

RESERVATION RATES	MARKET-TO-MARKET			FIELD-TO-FIELD/MARKET DEMARCATION
	TF12 Base	TF12 Variable	TF5	TFF
Base Tariff Rates 1/ 2/				
Summer (Apr-Oct)	10.830	10.830	-0-	7.438
Winter (Nov-Mar)	<u>19.495</u>	<u>26.426</u>	<u>28.881</u>	<u>13.388</u>

COMMODITY RATES 3/		Market Area 4/ 7/		Field Mileage 6/		Carlton		Out-of Balance 4/	
TF12 Base, TF12 Var., TF5 & TFF		Maximum	Minimum	Rate per 100 miles	Surcharge 5/	Maximum	Minimum	Maximum	Minimum
Receipt Point	Delivery Point			Maximum	Minimum				
Market	Market	0.0365	0.0218			0.0000	0.0000	0.0365	0.0218
Field	Market	0.0365	0.0218	0.0091	0.0044	0.0000	0.0000		
Market	Field			0.0091	0.0044				
Field	Field			0.0091	0.0044			0.0331	0.0160

- 1/ The minimum reservation rate is equal to zero.
- 2/ Northern may charge an average of the maximum TF12 (or TFF) and TF5 rates during the applicable months of service as set forth in the Firm Throughput Service Agreement without exceeding the maximum rate.
- 3/ The applicable Mileage Indicator Districts (MIDs) billing rate will be added to the TF rates for volumes received in the Field Area, or received in the Market Area and delivered to the Field Area. The MIDs rates shown on Sheet Nos. 59-60A represent the maximum Field Area throughput commodity rates for any transaction involving MIDs.
- 4/ The Maximum and Minimum rates include the Market Area Electric Compression commodity rate of \$0.0007 where applicable. In addition, Shipper shall pay the ACA unit surcharge as posted on FERC's website at <http://www.ferc.gov>.
- 5/ Applicable to Market Area shippers as provided for in the Carlton Settlement filed in Docket No. RP96-347 dated October 28, 1996.
- 6/ Where applicable, the Field Area Electric Compression commodity rate of \$0.0000 and the ACA unit surcharge as set forth on FERC's website at <http://www.ferc.gov> will be added to the mileage based rates.
- 7/ There will be no commodity charge for transportation from the Ventura pooling point (POI 78623) to the NBPL/NNG Ventura point (POI 192) and from the Ventura pooling point (POI 78623) to the MID 17 pooling point (POI 71458). In addition, there will be no commodity charge for transportation as set forth in Sheet Nos. 141, 142C and 147.

Northern Natural Gas Company
 FERC Gas Tariff
 Sixth Revised Volume No. 1

Eighteenth Revised Sheet No. 51
 Superseding
 Seventeenth Revised Sheet No. 51

RATE SCHEDULE TFX

RESERVATION RATES		MARKET-TO-MARKET		FIELD-TO-FIELD		Carlton Surcharge 5/		Out-of-Balance 4/	
		Apr-Oct	Nov-Mar	Apr-Oct	Nov-Mar				
Base Tariff Rates 1/ 2/		\$10.830	\$28.881	\$7.438	\$13.338				

COMMODITY RATES 3/ TFX		Market Area 4/ 7/		Field Mileage 6/ Rate per 100 miles		Carlton Surcharge 5/		Out-of-Balance 4/	
Receipt Point	Delivery Point	Maximum	Minimum	Maximum	Minimum	Maximum	Minimum	Maximum	Minimum
Market	Market	0.0365	0.0218			0.0000	0.0000	0.0365	0.0218
Field	Market	0.0365	0.0218	0.0091	0.0044	0.0000	0.0000		
Market	Field			0.0091	0.0044				
Field	Field			0.0091	0.0044			0.0331	0.0160

- 1/ The minimum reservation rate is equal to zero.
- 2/ Northern may charge an average of the maximum rates during the applicable months of service as set forth in the Firm Throughput Service Agreement without exceeding the maximum rate.
- 3/ The applicable Mileage Indicator Districts (MIDs) billing rate will be added to the TF rates for volumes received in the Field Area, or received in the Market Area and delivered to the Field Area. The MIDs rates shown on Sheet Nos. 59-60A represent the maximum Field Area throughput commodity rates for any transaction involving MIDs.
- 4/ The Maximum and Minimum rates include the Market Area Electric Compression commodity rate of \$0.0007 where applicable. In addition, Shipper shall pay the ACA unit surcharge as posted on FERC's website at <http://www.ferc.gov>.
- 5/ Applicable to Market Area shippers as provided for in the Carlton Settlement filed in Docket No. RP96-347 dated October 28, 1996.
- 6/ Where applicable, the Field Area Electric Compression commodity rate of \$0.0000 and the ACA unit surcharge as set forth on FERC's website at <http://www.ferc.gov> will be added to the mileage based rates.
- 7/ There will be no commodity charge for transportation from the Ventura pooling point (POI 78623) to the NBPL/NNG Ventura point (POI 192) and from the Ventura pooling point (POI 78623) to the MID 17 pooling point (POI 71458). In addition, there will be no commodity charge for transportation as set forth in Sheet Nos. 141, 142C and 147.

Northern Natural Gas Company
 FERC Gas Tariff
 Sixth Revised Volume No. 1

Second Revised Sheet No. 55

Superseding

First Revised Sheet No. 55

RATE SCHEDULES FDD, PDD, IDD, ILD & SMS

Rate Schedule FDD

Maximum Reservation Charge	3.7443	1/
Maximum Capacity Charge	0.7793	1/
Injection Charge - Firm	0.0197	
Withdrawal Charge - Firm	0.0197	
Annual Rollover Charge	0.7793	1/

Rate Schedule PDD

Maximum Capacity Charge	0.7793	1/
Maximum Monthly Inventory Charge	0.1881	1/
Injection Charge	0.0197	
Withdrawal Charge	0.0197	
Annual Rollover Charge	0.7793	1/

Rate Schedule IDD

Maximum Monthly Inventory Charge	0.1881	1/
Injection Charge	0.0197	
Withdrawal Charge	0.0197	
Annual Rollover Charge	0.7793	1/

Rate Schedule ILD

Maximum Charge	11.7500
Minimum Charge	0.5044
Performance Obligation Charge	2.0000

Rate Schedule SMS

Reservation Charge	3.2700
Commodity Rate	0.0260

1/ Minimum Rate is zero.

- Not Public Document – Not For Public Disclosure
 Public Document – Not Public Data Has Been Excised
 Public Document

Xcel Energy Information Request No. 6
Docket No.: G002/M-19-498
Response To: Minnesota Department of Commerce
Requestor: Sachin Shah
Date Received: August 13, 2019

Question:

Topic:

Reference(s): Northern States Power Co., d/b/a Xcel Energy, August 2 Demand Entitlement Filing.

Request:

- A. Please provide the individual tariff sheets by pipeline referenced in Attachment 1, Schedule 2 of the above referenced filing.

Please provide the requested information, in Adobe Acrobat format (*.PDF) with all links and formulae intact. If any of these links target an outside file, please provide all such additional files.

If this information has already been provided in the application or in response to an earlier Department information request (IR), please identify the specific cite(s) or Department IR numbers(s).

Response:

All tariff sheets referenced in this section are provided in responses DOC Information Request Nos. 3 and 5.

Preparer: Justin Holstein
Title: Senior Analyst
Department: Gas Planning
Telephone: 303-571-2750
Date: August 23, 2019

**PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED**

- Not Public Document – Not For Public Disclosure
 Public Document – Not Public Data Has Been Excised
 Public Document

Xcel Energy Information Request No. 9
Docket No.: G002/M-19-498
Response To: Minnesota Department of Commerce
Requestor: Sachin Shah
Date Received: November 1, 2019

Question:

Reference(s): Northern States Power Co., d/b/a Xcel Energy, November 1, 2019
Demand Entitlement Filing Supplement

On page 3 of its November 1, 2019 Supplemental Filing, the Company stated the following:

The second cost update stems from a change in customer circumstances. In October a large interruptible customer in Grand Forks indicated a need to move to firm sales service due to a failure of its backup system. To serve the additional requirements, we looked to acquire additional capacity. While Viking is fully subscribed across its system, limited capacity was available from Emerson to Grand Forks at the beginning of Viking's system. As a result, we contracted an additional 1,500 Dth/day of Viking Firm Transportation capacity for a term of one-year. The total cost impact is an additional \$85,512 on an annual basis effective November 1, 2019.

- A. Please explain the nature of the interruptible customer's business activity and identify the customer.
- B. Does this interruptible customer have telemetry installed? Please explain.
- C. Can the customer's meter be read daily? Hourly? Monthly? Please explain.
- D. Please identify historically the Town Border Station (TBS) that would feed into the Company's distribution system to provide service to this customer.

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- E. Would the TBS change with the customer's move to firm sales service? Please explain.
- F. Please separately provide the customer's consumption for the last five years, on a daily basis and monthly basis.
- G. Please separately provide, and identify, the applicable Company approved tariff sheet(s) that the customer previously took service under for the last five years.
- H. Please separately provide, the applicable Company approved tariff sheet(s) that the customer will now take service under going forward.
- I. Did the large interruptible customer previously provide nominations to the Company? Please explain in detail.
- J. If the Company's response to part (I) above is "yes", then please separately provide the historical nominations on a daily and monthly basis for the last five years.

For all tariff sheets, please provide the requested information, in Adobe Acrobat format (*.PDF) with all links and formulae intact. If any of these links target an outside file, please provide all such additional files.

For all other data, please provide the requested data in a Microsoft Excel executable format (*.xlsx) with all links and formulae intact. If any of these links target an outside file, please provide all such additional files.

In addition, whenever acronyms are used in the data given in response to all the parts above, please provide an explanation of all acronyms used AND also provide a brief but complete explanation of the source of each data series that is provided. If all of the above information has already been provided in the application or in response to an earlier Department information request (IR), please identify the specific cite(s) or Department IR numbers(s).

Response:

- A. The customer is the **[PROTECTED DATA BEGINS
PROTECTED DATA ENDS]**.
- B. The customer has three meters installed at the location. **[PROTECTED
DATA BEGINS**

**PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED**

PROTECTED DATA

ENDS].

- C. The customer's meters are able to be read monthly.
- D. Gas used to serve the customer historically enters the distribution system from the Grand Forks TBS on the Viking Gas Transmission (Viking) system.
- E. The customer's move to firm sales service does not change the TBS from which gas will enter into the distribution system. The configuration of the distribution system or its supply point will not change as a result of the customer's service choice.
- F. Billing month consumption and daily quantities where available are provided by customer meter in live Excel spreadsheet format as Attachment A to this response. Monthly quantities are provided in dekatherms, while daily quantities are read in MCF. There are gaps in the daily data during periods when the customers' phone lines are not operational. When the phone lines are not operational, a Company representative visits the site monthly to obtain readings. Since the measurement system is no longer communicating with the site, we do not have interval data. The Company continues to work with the customer to resolve the telemetry issues.
- G. Please see the Company's Large Interruptible Service tariff, Sheet Nos. 5-5 through 5-7, provided as Attachment B to this response.
- H. Please see the Company's Commercial and Industrial Service tariff, Sheet No. 5-2, provided as Attachment C to this response.
- I. The customer did not provide nominations to the company. Nominations are only required of transportation customers. This customer was an interruptible sales customer, and therefore did not nominate.
- J. N/A.

A portion of this response and Attachment A in its entirety are marked as "Not-Public" because they include information considered to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). This information includes confidential customer usage data having independent economic value from not being generally known to and not being readily ascertainable by other parties who could obtain economic value from its disclosure or

**PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED**

use. The disclosure of this information could adversely impact the Company and its customers by giving competitors specific information about particular customer activity. The Company undertakes efforts to keep this type of information confidential. The Company also considers this to be confidential customer information recognized by the Minnesota Data Practices Act. Thus, Xcel Energy maintains it as a trade secret pursuant to Minn. Rule 7829.0500.

Attachment A is marked as “Non-Public” in its entirety. Pursuant to Minnesota Rule 7829.0500, subp. 3, we provide the following descriptions of the excised material:

Attachment A:

1. **Nature of the Material:** Live Excel spreadsheet providing customer consumption data.
2. **Authors:** Company Billing Products and Services personnel
3. **Importance:** Confidential customer usage
4. **Date the Information was Prepared:** November 2019.

Preparer:	Shawn Paschke	Justin Holstein
Title:	Account Manager	Senior Analyst
Department:	ND Jurisdictional Management	Gas Planning
Telephone:	701-241-8601	303-571-2750
Date:	November 19, 2019	

**PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED**

Northern States Power Company

Docket No. G002/M-19-498
DOC Information Request No. 9

Attachment A

Attachment A is marked as “Non-Public” in its entirety. Pursuant to Minnesota Rule 7829.0500, subp. 3, we provide the following descriptions of the excised material:

Attachment A:

1. **Nature of the Material:** Live Excel spreadsheet providing customer consumption data.
2. **Authors:** Company Billing Products and Services personnel
3. **Importance:** Confidential customer usage
4. **Date the Information was Prepared:** November 2019.

Northern States Power Company, a Minnesota corporation
Minneapolis, Minnesota 55401
NORTH DAKOTA GAS RATE BOOK - NDPSC NO. 2

LARGE INTERRUPTIBLE SERVICE
RATE CODE 405

Section No. 5
7th Revised Sheet No. 5

AVAILABILITY

This rate is available on an interruptible basis to a commercial or industrial customer whose maximum hourly requirements are in excess of 10 Therms, whose maximum daily requirements are 2,000 Therms or more, and who will agree:

1. To curtail use of gas whenever requested by Company,
2. To provide and maintain suitable and adequate alternate fuel capable standby facilities, and
3. To have access to sufficient standby alternate fuel for periods of curtailment of the delivery of gas sold hereunder.

If a portion of a customer's gas usage is for processing or manufacturing, and curtailment would not be in violation of applicable codes, then requirements (2) and (3) above shall not apply to that portion. If customer agrees to confine the use of natural gas for specified end uses under this rate to the months of April through October in any calendar year, requirements (2) and (3) above shall not apply. However, any use under this rate is still curtailable at Company's option.

CHARACTER OF SERVICE

Service shall be provided through a Company owned meter with telemetering or other automated meter reading capabilities installed. Delivery of gas hereunder shall be subject to curtailment whenever requested by Company, such requests to be made as far in advance as possible. N
N

Under this rate, the customer is obligated to provide phone and/or electrical service that meets Company telemetry requirements. In the event the customer fails to do so, the Company will take action to ensure that natural gas usage data can be metered and transmitted accurately to the Company's billing system. The Company will either equip the customer with cellular meter reading technology (if service is available) or install a recording instrument that will be read manually each month by the Company using a laptop computer. The Customer will be charged for the costs of installation and monthly service. If neither option is available, the Company will move any interruptible customer meeting size requirements to Commercial Firm Service (which does not require telemetering). N
|
N

THERM ADJUSTMENT

Customer's Therm usage shall equal their Ccf consumption adjusted to reflect 1,000 Btu per cubic foot, a base pressure of 14.73 PSIA, and a gas temperature of 60 degrees Fahrenheit.

SUPERCOMPRESSIBILITY ADJUSTMENT

For customers served at 25 PSIG or greater, an adjustment factor or correction device shall be used to correct gas consumption measurements for supercompressibility. M

(Continued on Sheet No. 5-6)

Date Filed:	07-17-14	By: David M. Sparby	Effective Date:	01-01-15
		President and CEO of Northern States Power Company, a Minnesota corporation		
Case No.	PU-14-626		Order Date:	11-20-14

Northern States Power Company, a Minnesota corporation
 Minneapolis, Minnesota 55401

NORTH DAKOTA GAS RATE BOOK - NDPSC NO. 2

LARGE INTERRUPTIBLE SERVICE (Continued)
RATE CODE 405

Section No. 5
 6th Revised Sheet No. 6

RATE		M
Basic Service Charge per Month	\$275.00	
Distribution Charge per Therm	\$0.05120	
Cost of Gas Charge per Therm	Determined Monthly	M

Flexible Distribution Charge

Customers are normally served on the fixed rate but will be placed on the flexible rate if, for pricing reasons, the flexible rate is necessary to compete with a non-gas alternate energy supply/service. Company and customer will agree to a Distribution Charge within the range specified for Rate Code 407, Section 5, Sheet 8. Unless otherwise agreed, a five day notice of price change shall be provided. If Company and customer cannot agree to a flexible distribution charge and customer nonetheless uses gas, then customer shall be charged the maximum allowable flexible distribution charge.

DETERMINATION OF COST OF GAS

Wholesale natural gas costs fluctuate due to market conditions, pipeline delivery and storage cost changes, and seasonal demand variations. The Company's costs of purchasing delivered wholesale natural gas is determined each month as defined in the Cost of Gas Rider.

ADDITIONAL CHARGE FOR USE OF GAS DURING CURTAILMENT

If customer fails to curtail use of gas hereunder when requested to do so by Company, customer shall pay in addition to the appropriate above rates, either an amount equal to any payment Company is required to make to its pipeline supplier under the terms of its town border contract as a result of such failure to curtail, or \$5.00 per Therm of gas used in excess of the volume of gas to which customer is requested to curtail, whichever amount is greater. The payment of a penalty does not, under any circumstances, give the customer a contractual option to take unauthorized natural gas. Nor does such payment exclude or limit any other remedies available to the Company, including, but not limited to, shutting off the offending customer's supply of natural gas in the event they fail to curtail, interrupt, or restrict their use when notified by Company to do so.

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MONTHLY MINIMUM CHARGE

Basic Service Charge.

SURCHARGE

In certain communities, bills are subject to the applicable surcharge provided for in the Surcharge Rider.

LATE PAYMENT CHARGE

A 1.0% late payment charge will be added to the unpaid balance on date due.

PRIORITY CLASSIFICATION

Priority 1 shall have first priority. Curtailment shall begin with Priority 8 and progress to Priority 1. Priority classifications are defined in the General Rules and Regulations.

(Continued on Sheet No. 5-7)

Date Filed:	07-17-14	By:	David M. Sparby	Effective Date:	01-01-15
			President and CEO of Northern States Power Company, a Minnesota corporation		
Case No.	PU-14-626			Order Date:	11-20-14

Northern States Power Company, a Minnesota corporation
and wholly owned subsidiary of Xcel Energy Inc., operating in North Dakota
Minneapolis, Minnesota 55401

NORTH DAKOTA GAS RATE BOOK - NDPSC NO. 2

LARGE INTERRUPTIBLE SERVICE (Continued)
RATE CODE 405

Section No. 5
3rd Revised Sheet No. 7

TERM OF AGREEMENT

Service agreement shall be for a term of not less than one year. Upon expiration of term, agreement continues
in force until terminated by at least 30 days' written notice by either party.

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Date Filed: 12-15-06

By: David M. Sparby
President and CEO of Northern States Power Company

Effective Date: 07-01-07

Case No. PU-06-525

Order Date: 06-13-07

Northern States Power Company, a Minnesota corporation
and wholly owned subsidiary of Xcel Energy Inc., operating in North Dakota
Minneapolis, Minnesota 55401

NORTH DAKOTA GAS RATE BOOK - NDPSC NO. 2

COMMERCIAL AND INDUSTRIAL SERVICE
RATE CODE 403 AND 410

Section No. 5
6th Revised Sheet No. 2

AVAILABILITY

This rate is available to any commercial and industrial customer for general use of natural gas service.

THERM ADJUSTMENT

Customer's Therm usage shall equal their Ccf consumption adjusted to reflect 1,000 Btu per cubic foot, a base pressure of 14.73 PSIA, and a gas temperature of 60 degrees Fahrenheit.

RATE

Basic Service Charge per Month	\$30.00	C
Distribution Charge per Therm	\$0.10800	C
Cost of Gas Charge per Therm	Determined Monthly	

DETERMINATION OF COST OF GAS

Wholesale natural gas costs fluctuate due to market conditions, pipeline delivery and storage cost changes, and seasonal demand variations. The Company's costs of purchasing delivered wholesale natural gas is determined each month as defined in the Cost of Gas Rider.

MONTHLY MINIMUM CHARGE

Basic Service Charge.

SURCHARGE

In certain communities, bills are subject to the applicable surcharge provided for in the Surcharge Rider.

LATE PAYMENT CHARGE

A 1.0% late payment charge will be added to the unpaid balance on date due.

Date Filed:	12-15-06	By: David M. Sparby	Effective Date:	07-01-07
Case No.	PU-06-525	President and CEO of Northern States Power Company	Order Date:	06-13-07

20200228-5180 FERC PDF (Unofficial) 2/28/2020 1:37:36 PM

February 28, 2020

VIA ELECTRONIC FILING

Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: *Viking Gas Transmission Company*, Docket No. RP19-1340-000
Stipulation and Settlement Agreement

Dear Secretary Bose:

Pursuant to Rule 602 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.602, Viking Gas Transmission Company (“Viking”) hereby files the attached Stipulation and Offer of Settlement (“Settlement”) resolving all issues in this proceeding. Viking believes that the Settlement is supported or not opposed by all participants.

This filing includes:

- The Settlement (including appendices and *pro forma* tariff sheets) resolving all issues set for hearing in this proceeding; and
- A separate Explanatory Statement, which contains a summary of the Settlement terms, as well as the information required by the December 15, 2016 Amended Notice.

This proceeding concerns an investigation of Viking’s rates under section 4 of the Natural Gas Act, 15 U.S.C. § 717c, which was initiated by Viking on June 28, 2019. The Commission accepted Viking’s proposed rates to be effective January 1, 2020, subject to refund and other conditions, and set the matter for hearing.¹ Thereafter, then-Presiding Judge Philip C. Baten adopted a procedural schedule, active parties conducted substantial discovery, and publicly-noticed settlement conferences, under the auspices of Settlement Judge Stephanie Nagel, were convened on September 4, 2019, November 21, 2019, and December 12, 2019. On February 6, 2020, the participants reached an agreement in principle on all material terms for resolution of the case.

The Settlement reflects an interrelated package of compromises between and among Viking and the parties. The Settlement resolves all issues in this proceeding,

¹ *Viking Gas Transmission Co.*, 168 FERC ¶ 61,070 (2019).

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reducing Viking's rates. All parties were provided an opportunity to participate in the negotiation of the Settlement. Viking believes that the Settlement is unopposed.

Request for Transmission to Presiding Judge

In accordance with Rule 602(b)(2)(i), 18 C.F.R. § 385.602(b)(2)(i), Viking requests that the Settlement and accompanying documents be transmitted to Presiding Judge Andrea McBarnette for certification, with a courtesy copy to Settlement Judge Stephanie Nagel. Viking believes that the Settlement will be "uncontested" within the meaning of 18 C.F.R. § 385.602(g).

Waivers

While Viking knows of no required waivers, Viking respectfully requests that the Commission grant any waivers of its regulations, policy or precedent that the Commission may deem necessary to accept this Settlement as proposed herein.

Certification of Posting and Service

In accordance with 18. C.F.R. §§ 154.2(d) and 385.602(d), the undersigned certifies that copies of this filing have been posted and served to all customers and interested state regulatory commissions, as well as all persons on the service list prepared by the Secretary in this docket.

Respectfully submitted,

By: /s/ Ryan J. Collins

Ryan J. Collins

Michael J. Thompson

Wright & Talisman P.C.

1200 G Street N.W., Suite 600

Washington, D.C. 20005

(202) 393-1200

collins@wrightlaw.com

thompson@wrightlaw.com

**Attorneys for
Viking Gas Transmission Company**

February 28, 2020

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APPENDIX C

Viking Gas Transmission Company Docket No. RP19-1340-000

Parties Supporting or Not Opposing the Settlement

BP Canada Energy Marketing Corp.
Canadian Association of Petroleum Producers
CenterPoint Energy Resources Corp., dba CenterPoint Energy Minnesota Gas
CHS Inc.
Concord Energy LLC
Direct Energy Business Marketing, LLC
DTE Gas Company
Exelon Corporation
Great Plains Natural Gas Company
Greater Minnesota Gas, Inc.
Koch Energy Services, LLC
Midwest Natural Gas, Inc.
Minnesota Department of Commerce
Minnesota Energy Resources Corporation
Montana-Dakota Utilities Co.
Northern States Power Company, a Minnesota Corporation
Northern States Power Company, a Wisconsin Corporation
Sequent Energy Management, L.P.
St. Croix Valley Natural Gas Company, Inc.
Tenaska Marketing Ventures
Viking Gas Transmission Company
Viking Shipper Alliance (comprised of Ace Ethanol LLC, American Crystal Sugar Company,
Big River Resources Boyceville, LLC., Cardinal FG Company, City of Perham,
Minnesota, and JR Simplot Company)
Wisconsin Gas LLC

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Docket Nos. RP19-1340-000, *et al.*

On June 28, 2019, Viking filed tariff records pursuant to section 4 of the Natural Gas Act (NGA)² to implement tariff changes and increased rates. Many parties filed motions to intervene and/or protests (Intervenors). On July 31, 2019, the Commission accepted and suspended for five months Viking's rate increase, subject to refund and the outcome of a hearing.³ The Commission accepted, without suspension, Viking's proposed administrative tariff change.⁴

On August 5, 2019, the Chief Administrative Law Judge (Chief Judge) designated the Honorable Philip C. Baten as Presiding Judge.⁵ On August 7, 2019, the Chief Judge Cintron appointed the Honorable Stephanie Nagel as Settlement Judge.⁶ On October 25, 2019, the Chief Judge issued an order substituting the Honorable Andrea McBarnette as Presiding Judge.⁷ Over the course of several months, the participants engaged in settlement negotiations and met for publicly-noticed settlement conferences on September 4, 2019, November 21, 2019, and December 12, 2019.⁸ On December 20, 2019, Viking filed a motion to place its proposed rates into effect, tried up for the actual cost of gas plant in service at the end of the test period, effective January 1, 2020 (Motion

² 15 U.S.C. § 717c (2012).

³ *Viking Gas Transmission Co.*, 168 FERC ¶ 61,070, at Ordering Paragraphs (A) (2019).

⁴ *Id.* at Ordering Paragraphs (B).

⁵ Order of Chief Judge Designating Presiding Administrative Law Judge and Establishing Track III Procedural Time Standards, Docket No. RP19-1340-000 (issued Aug. 5, 2019).

⁶ Order of Chief Judge Designating Settlement Judge, Docket No. RP19-1340-001 (issued Aug. 7, 2019).

⁷ Order of Chief Judge Making Substitute Designation of Presiding Judge, Docket No. RP19-1340-000 (issued Oct. 25, 2019).

⁸ Report of Settlement Judge, Docket No. RP19-1340-001 (issued Feb. 18, 2020).

20200319-5105 FERC PDF (Unofficial) 3/19/2020 12:43:30 PM

Docket Nos. RP19-1340-000, *et al.*

Rates).⁹ On February 6, 2020, the participants reached an agreement in principle that would resolve all issues set for hearing. On February 7, 2020, Trial Staff and Viking filed a joint motion to suspend the procedural schedule,¹⁰ which the Chief Judge granted in part by suspending the procedural schedule for 90 days.¹¹

On February 14, 2020, Viking filed a motion to place the Settlement rates into effect on an interim basis, thereby granting their customers rate relief prior to approval of the Settlement.¹² The Chief Judge granted the motion on February 21, 2020, with the rates going into effect on March 1, 2020.¹³

SUMMARY OF THE SETTLEMENT

The Settlement package contains the following:

- i) Viking's transmittal letter;
- ii) A Stipulation and Offer of Settlement, including three appendices, one of which shows in redline changes to the *pro forma* tariff sheet; and
- iii) A separate explanatory statement, including responses as required by the Chief Administrative Law Judge's December 15, 2016 *Amended Notice to*

⁹ Motion to Place Suspended Revised Tariff Record into Effect to be Effective 1/1/2020, Docket No. RP19-1340-002 (filed Dec. 20, 2019).

¹⁰ Joint Unopposed Motion to Suspend Procedural Schedule and to Waive or, Alternatively, Shorten the Answer Period, Docket No. RP19-1340-000 (filed Feb. 7, 2020).

¹¹ Order of Chief Judge Holding the Hearing Proceeding in Abeyance, Docket No. RP19-1340-000 (issued Feb. 12, 2020).

¹² Unopposed Motion to Place Settlement Rates Into Effect on an Interim Basis and for Waiver of Answer Period, Docket No. RP19-1340-003 (filed Feb. 14, 2020). On February 19, 2020, due to eTariff metadata issues, Viking resubmitted the motion with corrected metadata. Unopposed Motion to Place Settlement Rates Into Effect on an Interim Basis and for Waiver of Answer Period, Docket No. RP19-1340-004 (filed Feb. 19, 2020).

¹³ Order of Chief Judge Granting Motion for Interim Implementation of Settlement Rates, Docket No. RP19-1340-004 (issued Feb. 21, 2020).

20200319-5105 FERC PDF (Unofficial) 3/19/2020 12:43:30 PM

Docket Nos. RP19-1340-000, *et al.*

*the Public on Information to be Provided with Settlement Agreements and
Guidance on the Role of Settlement Judges.*

The following is a review of the more significant provisions of the Settlement:

Background

The Settlement begins by briefly describing the factual and procedural background of this case. This section also provides that the Settlement resolves all issues in this proceeding and that, with the exception of the rate and depreciation elements specifically identified in the Settlement, the Settlement establishes rates on a “black box” basis.

Article I (Rate Matters)

Section 1.1 states that the Settlement Rates are those placed into effect on March 1, 2020, pursuant to Viking’s motion for interim rates.

Section 1.2 states that the Settlement Rates shall be effective as of January 1, 2020. Viking shall refund to customers any amount collected in excess of the Settlement Rates for the period January 1, 2020 through February 29, 2020. Such refunds shall include interest calculated in accordance with section 154.501(d) of the Commission’s regulations.¹⁴ Viking shall file a refund report within thirty (30) days after making refunds.

Section 1.3 states that if the Commission rejects the Settlement or Viking withdraws it pursuant to Article IV, Viking may file a request to reinstate the Motion Rates pending the final outcome of the hearing, subject to refund, and may request to

¹⁴ 18 C.F.R. § 154.501(d).

20200319-5105 FERC PDF (Unofficial) 3/19/2020 12:43:30 PM

Docket Nos. RP19-1340-000, *et al.*

surcharge the shippers for the differences between the amounts collected under the Settlement Rates and the Motion Rates.

Section 1.4 states that the Settlement Rates reflect depreciation and negative salvage rates as stated in Appendix A.

Section 1.5 provides Viking shall begin amortizing the total excess deferred income tax (EDIT) balance at January 1, 2018 of \$8,895,410 (before income tax gross up) beginning on the effective date of the Settlement Rates, January 1, 2020. The balance shall be amortized over twenty-three (23) years at an annual amount of \$386,757 prior to gross up. If, during the term of the Settlement, Viking's amortization of EDIT would violate tax normalization principles under the Internal Revenue Code, Viking shall have the right to modify its accounting or amortization of EDIT, provided that Viking files a notice of such action with the Commission and provides notice to the parties in this proceeding. Viking shall not adjust the Settlement Rates to reflect any such modified accounting or amortization. If Viking is a federal income tax-paying entity in its next general rate case, the unamortized balance shall be used for rate-making purposes. But if Viking is not a federal income tax-paying entity in its next general rate case, all parties reserve the right to take any position regarding the unamortized EDIT balance.

Article II (Tariff Matters)

Article II memorializes Viking's agreement that, upon Commission approval of the Settlement, Viking will submit tariff revisions, in the form of the *pro forma* sheets attached at Appendix B to the Settlement, with a proposed effective date of thirty (30) days after the settlement becomes effective. If the settlement will not become effective

20200319-5105 FERC PDF (Unofficial) 3/19/2020 12:43:30 PM

Docket Nos. RP19-1340-000, *et al.*

by August 1, 2020, Viking may submit the agreed-upon tariff revisions at any time prior to the settlement effective date.

Article III (Future Section 4 Rate Filing)

Article III states that Viking shall file a general rate case under section 4 of the NGA no later than three years after the Settlement effective date. However, this obligation shall be extinguished if prior to such date (i) Viking files for Commission approval of a general rate settlement that is the product of negotiation between Viking and its shippers and is supported or not opposed by a majority of Viking's shippers, or (ii) the Commission has instituted an investigation of Viking's rates under section 5 of the NGA.

Article IV (Effectiveness)

Section 4.1 states that the Settlement shall become effective when approved by a final Commission order as to all its terms without material modification, reservation, or condition, unless accepted pursuant to section 4.2.

Section 4.2 establishes the parties' rights and obligations in the event that the Commission approves the Settlement subject to a material modification, reservation, or condition not acceptable to Viking or any Non-Contesting Party.

Section 4.3 defines Contesting and Non-Contesting Parties, and establishes the Settlement's applicability as to each.

Article V (Term)

Article V states that upon becoming effective in accordance with Article IV, the Settlement shall remain in effect until, and shall terminate when, the Commission, by

20200319-5105 FERC PDF (Unofficial) 3/19/2020 12:43:30 PM

Docket Nos. RP19-1340-000, *et al.*

final order, authorizes, fixes, or permits new rates to take effect as a result of a later proceeding.

Article VI (Waiver and Authority)

Article VI states that the Commission’s approval of this Settlement shall constitute any and all waivers and provide all authority under the NGA and the Commission’s rules and regulations that may be necessary for Viking to implement the Settlement in accordance with all of its terms.

Article VII (Standard of Review)

Article VII sets for the standard of review for the Settlement. The standard of review for modifications proposed by the Commission acting *sua sponte*, by the Non-Contesting Parties acting unanimously, or by any third parties shall be the ordinary just and reasonable standard. The standard of review for any modifications requested by one or more, but less than all, Non-Contesting Parties shall be the “public interest” standard of review.

Article VIII (Miscellaneous)

Article VIII contains certain reservations of rights and other terms common in settlements, such as a provision that the Settlement has no precedential value.

DISCUSSION

Trial Staff has reviewed the Settlement and does not oppose its certification to the Commission and thereafter approval by the Commission. The Settlement Rates would represent a substantial decrease in both Viking’s as-filed and currently-effective rates. The Settlement also requires Viking to make a general NGA section 4 rate filing no later

20200319-5105 FERC PDF (Unofficial) 3/19/2020 12:43:30 PM

Docket Nos. RP19-1340-000, *et al.*

than three years after the Settlement effective date, thereby providing Viking's customers and the Commission another opportunity to review the appropriateness of Viking's rates in the near future. Lastly, the Commission's approval of the Settlement would represent an efficient means of resolving all issues in dispute in this proceeding and prevent the Commission and the participants from expending resources in litigation. For these reasons, Trial Staff does not oppose certification and approval of the Settlement.

Finally, Trial Staff provides the following responses to the Chief Administrative Law Judge's questions about settlements set forth in the December 15, 2016 *Amended Notice to the Public on Information to be Provided with Settlement Agreements and Guidance on the Role of Settlement Judges*:

- Question No. 1 – No other pending cases will be impacted by the Settlement.
- Question No. 2 – The Settlement does not resolve any issues of first impression.
- Question No. 3 – The Settlement does not depart from Commission precedent.
- Question No. 4 – The Settlement does not seek to impose a standard of review other than the ordinary “just and reasonable” standard with respect to any changes to the Settlement that might be sought by either a third party or the Commission acting *sua sponte*. Article VII of the Settlement provides the applicable standard of review.

CONCLUSION

The Settlement represents a reasonable resolution of all issues set for hearing in this proceeding. Accordingly, and for the reasons set forth above, Trial Staff does not

20200319-5105 FERC PDF (Unofficial) 3/19/2020 12:43:30 PM

Docket Nos. RP19-1340-000, *et al.*

oppose certification of the Settlement to the Commission and approval of the Settlement
by the Commission.

Respectfully submitted,

/s/ Alec T. Swafford
Alec T. Swafford
Thomas A. Bridges
Commission Trial Staff Counsel

March 19, 2020
Washington, DC

20200319-5105 FERC PDF (Unofficial) 3/19/2020 12:43:30 PM

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of March 2020, I have served the attached document by electronic mail on all parties on the official service list maintained by the Commission for this proceeding.

/s/ Alec T. Swafford
Commission Trial Staff Counsel

20200319-5105 FERC PDF (Unofficial) 3/19/2020 12:43:30 PM

Document Content(s)

Viking Trial Staff Settlement Comments.PDF.....1-10

20191216-3055 FERC PDF (Unofficial) 12/16/2019

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Northern Natural Gas Company

Docket No. RP19-1353-001

ORDER OF CHIEF JUDGE TERMINATING
SETTLEMENT JUDGE PROCEDURES

(Issued December 16, 2019)

1. On December 6, 2019, Settlement Judge Philip C. Baten reported that the parties and participants had reached an impasse in the settlement proceeding, and recommended that settlement proceedings be terminated.¹
2. Accordingly, settlement judge procedures are hereby terminated.

SO ORDERED.

Carmen A. Cintron
Chief Administrative Law Judge

¹ *Final Status Report*, Docket No. RP19-1353-001 (filed December 6, 2019).

20191216-3055 FERC PDF (Unofficial) 12/16/2019

Document Content(s)

RP19-1353-001 CJO Termination SJ Pro.PDF.....1-1

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. G002/M-19-498

Dated this **15th** day of **April 2020**

/s/Sharon Ferguson

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