



414 Nicollet Mall  
Minneapolis, MN 55401

November 9, 2020

—Via Electronic Filing—

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

RE: REPLY COMMENTS  
CHANGES IN CONTRACT DEMAND ENTITLEMENTS  
DOCKET NO. G002/M-20-633

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these reply comments in response to the October 29, 2020 Comments of the Minnesota Department of Commerce (Department) in the above-referenced docket.

We appreciate the Department's thorough review of the Company's Contract Demand Entitlements Petition. In this Reply, we provide responses to the Comments of the Department. We also provide an update on a pipeline refund.

### **REPLY COMMENTS**

#### **A. ANR Pipeline & Great Lakes - Alberta Xpress Project**

As the Department noted in its Comments, on June 22, 2020 ANR Pipeline Company (ANR) and Great Lakes Gas Transmission (Great Lakes) each filed limited certificate applications with the Federal Energy Regulatory Commission (FERC) for the Alberta Xpress Project (Docket Nos. CP20-484 and CP20-485 respectively).

The project is designed to transport gas from Western Canada to the United States Gulf Coast. The project proposes ANR lease currently unsubscribed capacity from Great Lakes in order to transport gas from the Canadian border to ANR's facilities in Louisiana. The capacity lease will function similarly to ANR holding a firm transportation agreement on Great Lakes, which ANR proposed to do if FERC

does not approve the capacity lease. ANR also proposed to build new facilities required to increase North to South transportation on its Southeastern Mainline to deliver to the Gulf Coast. Overall the project proposes to utilize mostly existing facilities to increase the access of Western Canadian gas to the Gulf Coast.

Xcel Energy intervened in both dockets. Xcel Energy holds firm transportation capacity on both ANR and Great Lakes and wants to ensure that existing service is not adversely affected by the Alberta Express Project. We reviewed the pertinent information related to the project and the capacity lease described in these dockets. The capacity lease does not appear to affect any services, while the facilities to be constructed are located well downstream of the facilities used to serve Xcel Energy. Xcel Energy believes that the proposal will have no effect on our transportation agreements or on service to our customers.

## **B. Northern Natural Gas (Northern) Interim Rate Refund**

On October 23, 2020, the Company received a refund of approximately \$4.4 million from Northern for the difference between interim rates in effect January 1, 2020 and April 30, 2020 and the rates approved in the settlement between Northern, NSP, other customers of Northern, and FERC Staff in Docket No. RP19-1353. The Company plans to return this refund in January 2021, as a one time bill credit to natural gas customers taking firm gas sales service.

## **CONCLUSION**

We appreciate the opportunity to submit our reply to the Department's Comments. We provided the additional information in response to the questions raised by the Department.

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

Sincerely,

/s/

LISA PETERSON  
MANAGER, REGULATORY ANALYSIS

c: Service List

## CERTIFICATE OF SERVICE

I, Crystal Syvertsen, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

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

xx electronic filing

**Docket No. G002/M-20-633**

Dated this 9th day of November 2020

/s/

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Crystal Syvertsen  
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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