414 Nicollet Mall
Minneapolis, MN 55401

July 19, 2024

—Via Electronic Filing—

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

RE: REPLY COMMENTS
IN THE MATTER OF A COMMISISON INVESTIGATION INTO GAS UTILITY RESOURCE PLANNING
DOCKET NO. G008,G002,G011/CI-23-117

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments in response to the Public Utility Commission's May 7, 2024 Notice of Extended Comment Period regarding filing requirements for natural gas integrated resource plans.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Shannon Whiton at shannon.whiton@xcelenergy.com or contact me at bria.e.shea@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
REGIONAL VICE PRESIDENT, REGULATORY POLICY

Enclosure
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF A COMMISSION INVESTIGATION INTO GAS UTILITY RESOURCE PLANNING

DOCKET NO. G008,G002,G011/CI-23-117

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments to the Minnesota Public Utilities Commission (Commission) in response to the Commission's May 7, 2024 Notice of Extended Comment Period ("Notice") issued in the above-noted docket and Initial Comments filed June 28, 2024 by the following parties: the Minnesota Department of Commerce (Department); Center for Energy and Environment (CEE); Citizens Utility Board of Minnesota (CUB); Office of the Attorney General – Residential Utilities Division (OAG); Clean Energy Organizations (CEOs), collectively consisting of Fresh Energy, Minnesota Center for Environmental Advocacy, and Sierra Club; CenterPoint Energy (CNP); Minnesota Energy Resource Corporation (MERC); and the Building Decarbonization Coalition. On May 31, 2024, Xcel Energy, CNP, and MERC submitted straw proposals outlining additional filing requirements for the natural gas utilities' integrated resource plans (gas IRPs) in response to the Notice and provided additional information in Initial Comments, as discussed below, at the request of stakeholders.

REPLY COMMENTS

I. FRAMEWORK ORDER PROVIDES SUFFICIENT DETAIL FOR EXECUTING NATURAL GAS INTEGRATED RESOURCE PLANS

As we stated in our May 31, 2024 response to the Commission's Notice in this docket, it is important that utilities have a flexible natural gas resource planning process that is designed to evolve as we learn and our capabilities develop. Flexibility should be incorporated into both the process and the requirements for IRPs to facilitate an iterative and adaptive approach. The Commission's March 27, 2024 Order Establishing Framework for Natural Gas Utility Integrated Resource Planning (Framework Order) provides this essential flexibility and thorough direction for the utilities to develop gas IRPs. In this context, the Company offered a straw proposal for additional filing requirements that the Commission may consider for gas IRPs in conjunction with Framework Order points in our May 31, 2024 filing in this docket. In Initial Comments, the parties largely agree with our straw proposal, with some proposed modifications and requests for additional information. Below, we discuss the parties' comments and provide a revised list of recommended decision options, as requested by Commission staff.

A. Consideration of the State's economy-wide greenhouse gas reduction statutory goals.

In our straw proposal, we suggest a decision option to consider the State's economy-wide greenhouse gas reduction statutory goals consistent with Minn. Stat. § 216H.01 and 216H.02 using 2020 as the baseline year. Lifecycle greenhouse gas (GHG) emission factors from filed Natural Gas Innovation Act (NGIA) Plans can also be considered in resource analysis to ensure lower emissions on a lifecycle basis. This suggestion provides additional detail to the Framework Order Point 4, which requires that the scope of integrated resource planning consider the State's economy-wide GHG reduction statutory goals. In Initial Comments, CEE and the DOC support our proposed decision option.[1] We note that CEE takes no position on the baseline year from which natural gas emission reductions are calculated.[2]

While not disagreeing with our proposed decision option, CUB and the CEOs recommend that the Commission require utilities to provide a narrative description of how the preferred plan will contribute to achieving the State's greenhouse gas emission reduction goals.[3] In its Framework Order, the Commission found that "the objective of integrated resource planning for natural gas utilities is to determine, based on the best information currently available, the mix of energy resources that best protects ratepayer and public interests; maintains safe, reliable, and affordable service; and advances state policy moving forward."[4] Requiring a narrative specifically targeted at greenhouse gas goals places one aspect of the objective adopted by the Commission over the others. As such, we disagree with CUB and the CEO's suggestion that the Commission require a narrative specifically related only to one of the objectives (advancing state policy) and not the others. Further, Order Point 4 in

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[1] Initial Comments CEE at p. 4, Department at p. 3.
[2] CEE Initial Comments at p. 5.
[3] Initial Comments CUB at pgs. 3-4, CEOs at pgs. 1-2 and 14.
[4] At Order Point 2.

the Framework Order states that the scope of the IRP *considers* the State's economy-wide greenhouse gas reduction statutory goals. In our IRP, we fully expect to discuss how our resource plan aligns with the objectives and scope set forth by the Commission in its Framework Order.

CUB also recommends expanding utility consideration to both in-state and out-of-state emissions and asks that utilities provide an additional description of how emission factors from NGIA plans will be considered in the resource analysis.[5] While the Company acknowledges and appreciates CUB's point that greenhouse gas emissions are a global concern, the State's greenhouse gas reduction statutory goals are based on in-state emissions.[6] That said, we commit to use lifecycle greenhouse emission factors from filed NGIA Plans in the resource analysis, which considers out-of-state emissions. For instance, if we propose to scale a pilot NGIA project, or a project that resembles an NGIA project, in the resource plan, we will use emission factors from NGIA in the resource analysis. Additionally, if we include generic resource types in our plan, subject to refinement after subsequent requests for proposals (RFPs), NGIA or ECO plans, we can use an appropriate and representative averaging of available NGIA factors.

B. Appropriate and cost-effective level of future energy efficiency procurement

Order Point 12 in the Framework Order states that "[t]he analysis should provide utility-specific clarity about the appropriate and cost-effective level of future energy efficiency procurement." In our straw proposal, we suggest that the "appropriate and cost-effective level of future energy efficiency procurement shall correspond to the maximum program spending level that remains cost-effective when compared to supply-side alternatives." In Initial Comments, CEE and DOC support our proposed decision option.[7] CUB supports our proposed decision option with an edit to strike "supply side" from our proposed decision option.[8] This would result in a comparison of the maximum program spending level that remains cost-effective to all other alternatives. We agree with this modification.

C. Environmental externality costs and regulatory cost of carbon

Order Point 17 in the Framework Order directs utilities to estimate the environmental externality costs of resource options. In our respective straw proposals, the Company

[5] CUB Initial Comments at pgs. 3-4.
[6] Minn. Stat. § 216H.02, Subd. 1.
[7] Initial Comments, CEE at p. 7, DOC at p. 4.
[8] CUB Initial Comments at p. 7.

and CNP recommend using the most recent externality values adopted by the Commission in Docket No. E-999/CI-14-643 to estimate environmental externality costs of resource options[9] – aligning the source of the externalities with those used for Energy Conservation and Optimization (ECO) and NGIA plans to streamline consideration across natural gas planning and programs.[10] In Initial Comments, the DOC, CEE, CEOs, and CUB agree with this recommendation.[11]

As described by CNP in its straw proposal, the equivalency factor to translate the social cost of carbon into a social cost of methane is different between the ECO plans and the NGIA Plans.[12] The CEOs recommend that the Commission clarify that the NGIA equivalence factor should be used in gas IRP dockets. This is because the factor used in ECO is based only on combustion, whereas the factor in NGIA considers lifecycle emissions.[13] We believe this clarification is unnecessary. The Commission adopted externality values, including those for methane, found in the U.S. Environmental Protection Agency's (EPA) Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances.[14] That Report provides values for the Social Cost of Methane in $/metric ton of methane emitted, which already accounts for the greater Global Warming Potential of methane relative to carbon dioxide.

Both CUB and the CEOs also requested that utilities provide explanation of how, and to what extent they intend to incorporate externality costs in their analyses.[15] Further, the CEOs suggest that the Commission should clarify that utilities should include externalities in scenarios in the same manner as electric utilities to the greatest extent possible.[16] The Company is in the process of determining the best approach and the

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[9] December 19, 2023 ORDER ADDRESSING ENVIRONMENTAL AND REGULATORY COSTS. *In the Matter of Establishing an Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minnesota Statutes § 216H.06* and *In the Matter of the Further Investigation into Environmental and Socioeconomic Costs Under Minn. Stat. § 216B.2422, Subdivision 3*. This ORDER "provisionally adopts and applies the draft measurement of costs related to the emission of greenhouse gases as set forth in the EPA's External Review Draft of Report on the Social Cost of Greenhouse Gases released in September 2022, and its successors." In its subsequent NOTICE OF FINAL EPA REPORT ON THE SOCIAL COST OF GREENHOUSE GASES (January 26, 2024), the Commission adopted the social cost of greenhouse gas values contained within the EPA's final Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances as the successor to the previously released External Review Draft report. Docket Nos. E-999/CI-07-1199, E-999/DI-22-236, and E-999/CI-14-643.
[10] CNP Straw Proposal (May 31, 2024) at pgs. 2-3.
[11] Initial Comments DOC at p. 5, CEE at p. 9, CEO at p. 6, CUB at p. 4.
[12] CNP Straw Proposal (May 31, 2024), at p. 3.
[13] CEO Initial Comments at p. 6.
[14] January 26, 2024 Notice of Final EPA Report on the Social Costs of GHGs in Docket Nos. E999/CI-07-1199, E999/DI-22-236, and E999/CI-14-643.
[15] CUB Initial Comments at p. 4.
[16] CEO Initial Comments at p. 6.

most suitable tools for conducting the required analysis. As such, it is premature for us to provide an explanation of how, and to what extent, we intend to incorporate externality cost into our analysis. Further, for this reason, we respectfully disagree with the CEO's suggestion that utilities should include externalities in scenarios in the same manner as electric utilities to the greatest extent possible. However, we agree to evaluate our revenue requirement on both a PVSC basis, which accounts for carbon and externality costs, and a PVRR basis, which excludes environmental cost adders, similar to our approach in electric IRPs.[17] We also agree to continue working with stakeholders on these additional details as the process unfolds prior to submitting our first plan.

In Initial Comments, CEE states that the Commission may wish to provide guidance to natural gas utilities related to the appropriate values or factors to apply to IRPs to estimate the costs of existing and future regulations of greenhouse gas emissions. Further, CEE requests input on the appropriateness of applying either the regulatory cost of carbon established through Minn. Stat. § 216H.06 for electric IRPs or the natural gas environmental compliance factor applied through ECO to the gas IRPs.[18] As noted by CEE, the ECO cost-effectiveness framework considers environmental compliance costs related to natural gas. In a March 31, 2023 Decision, the Deputy Commissioner of the Department adopted a factor of 1.40 percent of the commodity costs of natural gas for 2024-2025 to be used for natural gas environmental compliance impacts in ECO cost-effectiveness testing. This value is based on the EPA's Regulatory Impact Analysis for the proposed federal methane emission standards, anticipated to be finalized by the EPA in 2024.[19]

It is not appropriate to apply the regulatory cost of carbon established through Minn. Stat. § 216H.06 for the electric sector to the gas IRP. This regulatory cost of carbon was developed specifically for the electric sector and is not applicable to other sectors where natural gas is used for various applications (heating, manufacturing, etc.). The intent of a regulatory cost is to estimate and account for costs that future regulation may impose on a particular economic sector. The electric and gas sectors are in different places in terms of current and future regulations at state and national levels, types of greenhouse gas control technologies and measures, and the period of time over which reductions have been occurring. Therefore, it is not appropriate to assume

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[17] This aligns with Framework Order Point 49: "Natural gas resource plans shall include the cost of each scenario and sensitivity presenting both the utility's revenue requirement and environmental costs and other externalities to the utility's revenue requirement."
[18] CEE Initial Comments at pgs. 8 and 20.
[19] Department of Commerce Decision In the Matter of 2024-2026 CIP Cost-Effectiveness Methodologies for Electric and Gas Investor-Owned Utilities (March 31, 2023) in Docket Number E,G999/CIP-23-46 at p. 252.

the cost to reduce one ton of CO_2 equivalent, or the expected approach to or cost of complying with regulations, would be the same across sectors. Instead, using the natural gas environmental compliance factor from ECO is a more reasonable starting point for incorporating the regulatory cost of carbon into gas IRPs as it considers regulations applicable to the sector. This ECO factor has already undergone review by stakeholders, as part of Docket No. E,G999/CIP-23-46, for the cost-effectiveness policy for ECO and the Company expects the policy to be updated shortly before the anticipated initial gas IRP filing date.[20]

D. Additional analyses of scenarios and sensitivities in utility resource plans as directed by the Commission

In our straw proposal, we recommend that initial IRPs analyze the scenarios and sensitivities specified in Framework Order Points 45 and 46 as this serves as a practical starting point. Specifically, utilities shall analyze high, medium, and low load scenarios as well as high, medium, and low natural gas price sensitivities in their resource plans. Order Point 48 in the Framework Order allows the Commission to later require additional analyses of scenarios and sensitivities. In Initial Comments, CEE indicates that it does not believe the proposed clarification is necessary but did not necessarily oppose the clarification.[21] The Department supports the Company's proposal indicating that the nature of the gas IRP process will be iterative, and parties will have the opportunity to propose and consider additional analyses of scenarios and sensitivities in a future gas IRP filing.[22]

CUB agrees that our proposal is a sufficient starting point and does not suggest any additional scenarios or sensitivities at this point. However, CUB notes that the Commission's Framework Order already specifies that the Commission may require additional scenario and sensitivity analysis in iterative plans, and utility IRPs may also include additional analysis at their discretion. With that, CUB recommends the following modifications to our proposed decision option:

Proposed decision option: In initial integrated resource plans, utilities shall, at a minimum, analyze scenarios and sensitivities as specified in the March 27, 2024 Order in this docket. ~~The Commission may later order additional scenarios and sensitivities.~~

We agree with these modifications.

[20] A decision similar to the March 31, 2023 Decision from the Deputy Commissioner of the Department for the 2024-2026 period is expected to be issued in Spring 2026.
[21] CEE Initial Comments at p. 11.
[22] Department Initial Comments at p. 6.

E. Five-Year Action Plan

In our straw proposal, we recommend that the five-year action plan include justification of need, resource mix, project scope, construction timeline, and cost estimates. Our five-year action plan would include projects necessary to serve customer end-use energy needs as described in Framework Order Point 3.[23] In Initial Comments, CEE supports this proposal.[24] CUB is also supportive of this proposal and recommends utilities be required to include a narrative discussion of equity impacts the project may have. We agree and believe this aligns with our proposed decision option to include a discussion of how equity was considered in the planning process.

In Initial Comments, the Department also agrees with this proposal and suggests that the cost estimates should include "offsetting revenues and tax benefits" to ensure utilities capture and ratepayers receive all related revenues and tax benefits.[25] At the July 12, 2024 GPI Gas Utility Innovation Roundtable meeting, the Department clarified that "offsetting revenues" encompasses anything that could offset project costs (e.g., revenue from green tariffs, RNG credits). The Company supports this modification.

F. Expansion alternatives analysis and capital investment threshold

Order Point 51 in the Framework Order states that "[u]tilities shall incorporate infrastructure costs related to resource expansion or new resources above an investment threshold to be established at a later date into the resource analysis and selection process." In Initial Comments, CEE notes that at the June 18, 2024 Gas Utility Innovation Roundtable, stakeholders discussed whether utilities should include a distribution system analysis beyond what is included in the Expansion Alternatives Analysis in their IRPs. CEE's understanding of the Framework Order is that the Expansion Alternatives Analysis is the only distribution system analysis required at this time, and that the Commission may include additional distribution system planning requirements in iterative IRPs.[26] We agree with this interpretation.

In Initial Comments, the CEOs propose that the Expansion Alternatives Analysis include "non-pipeline alternatives and/or non-natural gas alternatives; costs and benefits of those alternatives including the costs of direct investments, variable costs,

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[23] Order Point 3 excludes infrastructure investments for routine maintenance, safety, public works accommodation, integrity, and reliability.
[24] CEE Initial Comments at p. 11.
[25] Department Initial Comments at pgs. 7 and 15.
[26] CEE Initial Comments at p. 12.

and the social cost of carbon and methane for emissions due to or avoided by the alternative; a thorough and transparent explanation of the criteria used to rank or eliminate such alternatives; and an explanation of how equity was considered."[27] We agree that an Expansion Alternatives Analysis includes all of these considerations.

We reply to comments on our proposed definitions to clarify projects to be included in the Expansion Alternatives Analysis and our proposed investment threshold below.

1. *Definitions*

In our straw proposals, the three natural gas utilities – Xcel Energy, CNP, and MERC – propose similar definitions for "infrastructure costs" and "capacity expansion project, resource expansion, or new resources."[28] Specifically, we recommend the following decision option in our straw proposal:

> *For the purposes of the natural gas integrated resource plan distribution system analysis, infrastructure costs shall include capital costs the utility would pay to do the project. Capacity expansion project, resource expansion, or new resources shall include individual projects, or a set of inter-related facilities needed to meet a specified capacity expansion need due to growth by existing or new customers and facilities. This excludes projects related to routine maintenance, public works accommodation, integrity, reliability, and safety.*

In Initial Comments, CEE supports our definition of "infrastructure costs." Further, CEE does not oppose our definition of capacity expansion projects, resource expansions, or new resources, but notes that the last sentence – "This excludes projects related to routine maintenance, public works accommodation, integrity, reliability, and safety." – is duplicative of Framework Order Point 55 and therefore unnecessary. [29] The Department supports inclusion of these definitions but defers to the Commission on the exact verbiage between each utility's proposed option.[30] CUB has no objection to the definitions offered by the utilities, but recommends adding an additional specification that projects that are geographically related and/or interdependent on each other should be considered as a single capacity expansion project for the purpose of determining Expansion Alternatives Analysis eligibility. Further, CUB suggested replacing "distribution system analysis" with "expansion alternatives analysis."[31]

[27] CEO Initial Comments at pgs. 13 and 15.
[28] Initial Comments CNP at p. 4. MERC at pgs. 2-3.
[29] CEE Initial Comments at p. 13.
[30] Department Initial Comments at p. 8.
[31] CUB Initial Comments at pgs. 7-8.

First, we agree with CEE's suggestion that the last sentence of our proposed definitions decision option is duplicative and unnecessary. Further, we agree with CUB to replace "distribution system analysis" with "expansion alternatives analysis." However, we disagree that geographically related projects should be considered as a single capacity expansion project. It is possible to have multiple projects near each other with no relation, and they may not always address the same issue.

2. *Investment Threshold*

In Initial Comments, CEE notes that stakeholders discussed at the June 18, 2024 Gas Utility Innovation Roundtable whether the investment threshold described in Order Point 51 applies only to the Expansion Alternative Analysis portion of the IRP or if it applied more broadly to the resource analysis. CEE understands the investment threshold described in Order Point 51 applies only to the selection of projects for the Expansion Alternatives Analysis. We agree with this interpretation. Further, we want to clarify that we may include projects not selected for an Expansion Alternatives Analysis in our five-year action plan.

It is also important to note that Order Point 49 in the Framework Order indicates that IRPs "shall include the cost of each scenario and sensitivity presenting both the utility's revenue requirement and environmental costs and other externalities to the utility's revenue requirement." CEE understands that the utility's revenue requirement would include all costs, including related distribution system and capital costs, associated with the different resource options included in the IRP. CEE uses a renewable natural gas resource as an example – the resource analysis should consider all expected capital costs associated with interconnecting, receiving, and distributing the renewable natural gas resource. We agree with this interpretation. As such, the utility revenue requirement for each scenario and sensitivity will capture all capital costs.

In our straw proposal, we recommend an investment threshold of $3 million, adjusted for inflation for each subsequent resource plan. At the request of stakeholders, in our Initial Comments, we shared that in the past five years, we had a total of six capacity expansion projects above $1 million, four of which are at or above our proposed threshold of $3 million. Further, we agree to evaluate and select projects below this threshold where warranted. In Initial Comments, stakeholders largely expressed an interest in setting an investment threshold for the Expansion Alternatives Analysis that captures a wide array of projects and reserved commenting on utility proposed investment thresholds until after the additional requested data is filed.

As acknowledged by the CEOs, it is important to tailor the project cost threshold to the size of the utility. Setting the threshold too high may limit the number of projects, while a threshold that is too low could lead to inefficient use of resources.[32] Drawing from our experience in Colorado's Gas Infrastructure Plan, parties agreed on a $3 million threshold with escalators.[33] Stakeholders should understand that capacity expansion projects constitute only a small fraction of the total capital budget. Further, as previously explained, all other capital costs would be aggregated into the utility revenue requirement for each scenario and sensitivity evaluated in the IRP.

As such, the Company maintains its proposal for an investment threshold of $3 million to capture significant capacity expansion projects. Further, as described in our Initial Comments, there may be opportunities to assess and select projects below this threshold in specific circumstances. However, if the Commission should decide a $1 million threshold is more appropriate, the number of projects considered for the analysis should be capped at 10. Compiling the supporting project data in an easily digestible format is a significant undertaking, requiring extensive collaboration and coordination among multiple departments to ensure accuracy and comprehensiveness. Therefore, limiting the number of projects to 10 is a reasonable approach to avoid undue burden.

G. Filing Schedule

In our straw proposal, Xcel Energy proposes to be the first utility to file a gas IRP. We anticipate being able to file our initial plan in late 2026. In Initial Comments, CEE, CUB, and the Department support this proposal.[34] The Department further comments that traditionally, the Department would recommend a November 1, 2026 filing date. However, November 1 is a common filing date for general rate cases. As such, the Department recommends the Commission adopt an October 1 filing date. The Company supports the Department's proposed October 1, 2026 filing date for Xcel Energy's initial gas IRP.

H. Stakeholder engagement

We note that various parties have put forth several suggestions regarding ongoing stakeholder engagement in the development of IRPs. The Company supports working with stakeholders to enhance community engagement and to inform our resource plans.

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[32] CEO Initial Comments at p. 8.
[33] Colorado Code of Regulations 723-4, Part 4, Rule 4551.
[34] Initial Comments CEE at p. 15 CUB at p. 11, Department at pgs. 9-10 and 15.

I. Upstream methane emissions

In response to the Notice question regarding the Company's analysis and reporting on the its past actual methane emissions, we propose to report methane emissions from natural gas distribution system operations using recognized reporting protocols, such as 40 CFR Part 98, Subpart W, in the natural gas integrated resource plan and annual updates.[35] In Initial comments, the Department supported our proposal and understands the Company is unable to provide accurate upstream methane emission values. However, the Department believes the Company should be working with gas suppliers to improve transparency in reporting of upstream methane emissions.[36] We agree to continue working with gas suppliers to enhance transparency in reporting of upstream methane emissions. One avenue we are pursuing to do so is purchasing natural gas with a certified methane emissions intensity.

The CEOs propose that each IRP include projected emissions that will result from its preferred plan and the other resource mixes considered. They also stipulate that projected emissions should include all emissions from distribution system operations and upstream emissions associated with purchased gas using recognized reporting protocols and available tools. The CEOs reference a tool developed by M.J. Bradley & Associates, an ERM Group Company, that quantifies the life cycle greenhouse gas emissions of delivered natural gas. This tool draws upon publicly available data from various sources, including the Environmental Protection Agency's Mandatory Greenhouse Gas Reporting Rule, 40 CFR 98, Subpart W, National Energy Technology Laboratory, Energy Information Administration, Argonne National Laboratory's Greenhouse Gas and Energy Use in Transportation (GREET) model, among others.[37]

As previously discussed, we commit to incorporating lifecycle greenhouse emissions using data from filed NGIA Plans in the resource analysis, where appropriate. Notably, the NGIA protocol, which was developed with significant stakeholder input and approved by the Commission,[38] already incorporates data from many of the same sources as the M.J. Bradley & Associates tool referenced by the CEOs. Introducing an

[35] The Commission moved reporting of the methane emission information in the Environmental Performance Outcome Metrics — methane emissions from the Company's distribution system, upstream methane emissions, and methane emissions across the full fuel cycle — to the Natural Gas Resource Plan dockets. See *Order Accepting 2021 and 2022 Reports, Suspending Decisions on Baselines and Targets, and Modifying Reporting Requirements* issued January 26, 2024 in Docket No. E002/CI-17-401 at Ordering Paragraph 9.
[36] Department Initial Comments at p. 10.
[37] CEO Initial Comments at pgs. 4-5.
[38] *In the Matter of Establishing Frameworks to Compare Lifecycle Greenhouse Gas Emission Intensities of Various Resources, and to Measure Cost Effectiveness of Individual Resources and of Overall Innovation Plans*, Docket No. G-999/CI-21-566, Order (June 1, 2022).

alternative approach to account for upstream methane emissions could lead to confusion. Further, when reporting our actual emissions, we want to avoid any misperception that upstream emissions estimates are as precise as our direct emissions reported to the EPA. As such, we respectfully disagree with the CEO's proposed decision option requiring that projected emissions include "upstream emissions associated with purchased gas using recognized reporting protocols and available tools."[39]

Finally, CUB requests utilities provide an update on the availability of upstream methane emissions data.[40] On May 14, 2024, the EPA finalized amendments to 40 CFR Part 98, Subpart W of the Greenhouse Gas Reporting Program.[41] Among other requirements, the final rule includes advanced measurement approaches to help identify and quantify previously unreported large release events. It also adds calculation methodologies that allow for direct emissions measurements for certain sources (e.g., equipment leaks) where direct measurement options were not previously provided. Most of the revisions would become effective on January 1, 2025, and reporters will implement most of the changes beginning with reports prepared for the 2025 reporting year and submitted on March 31, 2026. We are monitoring the impacts of the amended rule through our participation in ONE Future and will provide updates in our IRPs and annual reports.[42] Sufficient data must be available before the Company would propose a methodology for calculating upstream methane emissions.

J. Equity

In our straw proposal, we suggest that the IRPs include a discussion of how equity was considered in the planning process. CNP notes in its straw proposal that it "looks to evaluate ways to incorporate public data and mapping tools for low-income residents or located in a disadvantaged community."[43] The CEOs propose that utilities evaluate ways to overlay maps of proposed capital projects and resource acquisitions across maps of environmental justice and disadvantaged communities in the utilities' service areas.[44] CUB also reiterated an example in its previous comments to map planned distribution system investments overlaid with data identifying disadvantaged communities to help focus electrification in those communities. To

[39] CEO Initial Comments at pgs. 5 and 14.
[40] CUB Initial Comments at p. 11.
[41] For more information on updates to 40 CFR Part 98 Subpart W, please see https://www.epa.gov/ghgreporting/subpart-w-rulemaking-resources.
[42] The ONE Future Coalition is a group of more than 50 Natural Gas companies working together to voluntarily reduce methane emissions across the natural gas value chain. For more information, please see https://onefuture.us/.
[43] CNP Straw Proposal (May 31, 2024) at p. 7.
[44] CEO Initial Comments at pgs. 12-13 and 15.

that end, CUB recommends incorporating this type of mapping information in both the five-year action plan and in the Expansion Alternatives Analysis. We agree overlaying project information with maps of disadvantaged communities can help inform equity impacts. Notably, the EPA and Minnesota Pollution Control Agency (MPCA) have developed Environmental Screening and Mapping Tools that may be used for this purpose.[45] We will include a discussion of these, and other tools used to evaluate equity considerations in our IRP.

II. THE APPROPRIATE FILING REQUIREMENTS TO ALIGN WITH FRAMEWORK ORDER DECISIONS AND OBJECTIVES

As previously emphasized, it is important to create a flexible natural gas resource planning process that is designed to evolve as we learn, and our capabilities develop. Incorporating flexibility into both the process and its requirements enables an iterative and adaptive approach. Further, revisiting decisions already made by the Commission is unnecessary. The Commission's Framework Order provides essential flexibility and comprehensive guidance for the utilities to develop gas IRPs. In this context, we respond to additional stakeholder initial comments below.

A. Forecasting

Order points 39 and 40 in the Framework Order address the IRP forecasting requirements:

> 39. *Utilities shall provide utility load and customer forecasts in their resource plans.*
> 40. *Utilities shall provide a high, medium, and low load forecast, along with relevant assumptions, in their resource plans.*

In Initial Comments, the CEOs recommend that the Commission adopt additional requirements for utility load and customer forecasting, informed by Colorado's Gas Infrastructure Plan rules. Specifically, the CEOs propose:

> *Each integrated resource plan submitted by a gas utility must indicate how the utility load and customer forecasts incorporate, to the extent practicable, relevant external factors including, but not limited to: (1) the effect of current or enacted state and local building codes and standards; (2) building electrification, efficient fuel-switching, and energy efficiency programs or incentives offered by both the gas utility and the local electric utility or local, state, or federal entities that overlap with the utility's gas service territory; (3) the effects of rate*

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[45] Available at https://ejscreen.epa.gov/mapper/ and https://mpca.maps.arcgis.com/apps/MapSeries/index.html?appid=f5bf57c8dac24404b7f8ef1717f57d00.

> *design and/or demand response programs; (4) changes in the utility's line extension policies, and the associated impact on gas customer growth; and (5) the price elasticity of demand (e.g., the impact of reduced throughput and rate increases on sales and peak demand requirements and impacts of commodity prices).*[46]

Respectfully, we disagree. As noted above, while the CEOs propose additional forecasting requirements, the Commission's Framework Order already establishes the load forecasting requirements for initial IRPs. We expect our forecasting capabilities to evolve over time in conjunction with this iterative gas resource planning process.

B. Consistent and comparable basis for resource evaluation

Order Point 6 in the Framework Order stipulates that "all resources must be evaluated on a consistent and comparable basis." In Initial Comments, the CEOs propose that the Commission require utilities to use a uniform methodology to calculate the "all-in" costs of resources, facilitating an apples-to-apples comparison of resources. Respectfully, we disagree that this clarification is necessary. Order Point 6 in the Framework Order already establishes that resources must be evaluated on a consistent and comparable basis.

CONCLUSION

In the Notice, Commission staff request that stakeholders recommend decision options at the end of their comments, when possible. Below, we list the proposed decision options discussed in our straw proposal, with edits incorporated based on stakeholder comments as described above.

<u>Proposed decision options:</u>

1. Consider the State's economy-wide greenhouse gas reduction statutory goals consistent with Minn. Stat. § 216H.01 and 216H.02 using 2020 as the baseline year. Lifecycle GHG emission factors from filed Natural Gas Innovation Act (NGIA) Plans can also be considered in resource analysis to ensure lower emissions on a lifecycle basis.

2. To treat energy efficiency alongside all other energy resource options, utility integrated resource plans should evaluate energy efficiency achievement scenarios including expected program achievement to maximum achievement.

[46] CEO Initial Comments at pgs. 7 and 15.

3. The appropriate and cost-effective level of future energy efficiency procurement shall correspond to the maximum program spending level that remains cost-effective when compared to alternatives.

4. To estimate environmental externality costs of resource options, utilities shall use the most recent externality values adopted by the Commission in Docket No. E-999/CI-14-643.

5. In initial integrated resource plans, utilities shall, at a minimum, analyze scenarios and sensitivities as specified in the March 27, 2024 Order in this docket.

6. The utility's preferred five-year action plan shall include justification of need, resource mix, project scope, construction timeline, and cost estimates with any offsetting revenues and tax benefits.

7. For the purposes of the natural gas integrated resource plan distribution system analysis, infrastructure costs shall include capital costs the utility would pay to do the project. Capacity expansion project, resource expansion, or new resources shall include individual projects, or a set of inter-related facilities needed to meet a specified capacity expansion need due to growth by existing or new customers and facilities.

8. For Xcel Energy, the Expansion Alternatives Analysis shall include infrastructure costs related to resource expansion or new resources at or above a $3 million threshold, adjusted for inflation. Additionally, Xcel Energy may evaluate and select projects for an Expansion Alternatives Analysis below this threshold where warranted. The resource plan shall include a discussion of the rationale for the projects selected for an Expansion Alternatives Analysis.

9. Xcel Energy shall report methane emissions from natural gas distribution system operations using recognized reporting protocols, such as 40 CFR Part 98, Subpart W, in the natural gas integrated resource plan and annual updates.

10. Integrated resource plans shall include a discussion of how equity was considered in the planning process.

Dated: July 19, 2024

Northern States Power Company

Certificate of Service

I, Christine Schwartz, 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. G008, G002, G011/CI-23-117

Dated this 19th day of July 2024

/s/

____

Christine Schwartz
Regulatory Administrator

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