



September 9, 2025

Mike Bull, Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: Energy CENTS Coalition Letter Regarding Joint Proposed Decision Options – Docket No. G999/CI-21-565

Dear Mr. Bull:

The Energy CENTS Coalition (ECC) appreciates the opportunity to submit this letter in support of the joint proposed decision options in Docket No. G999/CI-21-565, offered in partnership with Center for Energy and Environment (CEE), LiUNA, and Xcel Energy. For ECC, energy policy must always be evaluated through the lens of affordability and equity. It is the measure we use to evaluate whether Minnesota’s energy system remains accessible to the low- and fixed-income households who can least afford rising costs.

The Commission is undertaking its deliberations in this docket at a time of great uncertainty for low-income utility customers. The future of the federal Low-Income Home Energy Assistance Program (LIHEAP) remains in doubt,¹ and Minnesotans risk higher energy costs as a result of the One Big, Beautiful Bill Act and its elimination of key clean energy incentives.² Changes to line extension policy are not only about infrastructure and emissions—they are also about whether costs and benefits are distributed equitably. These questions are particularly potent at a time when energy costs continue to rise and the future of affordability programs is uncertain. The uncertainty of our future begs a thoughtful and cautious approach to altering system design for the natural gas system.

ECC does not often weigh in on issues of resource planning. However, at this critical juncture in the State of Minnesota’s energy transition with so much economic and policy uncertainty on the horizon, we feel compelled to advocate for thoughtful policies that mitigate the economic risk low-

¹ LeMoult, Craig. “Trump Budget Proposal Would End Energy Assistance Program for Low-Income Americans.” *NPR*, NPR, 15 May 2025, www.npr.org/2025/05/15/nx-s1-5389917/trump-budget-proposal-would-end-energy-assistance-program-for-low-income-americans.

² Energy Innovation. “ASSESSING IMPACTS OF “ONE BIG BEAUTIFUL BILL ACT” ON MINNESOTA’S ENERGY COSTS, JOBS, HEALTH, AND EMISSIONS” June 2025. https://energyinnovation.org/wp-content/uploads/Impacts-Of-The-One-Big-Beautiful-Bill-On-Minnesota-Energy-Costs-Jobs-Health-And-Emissions_FINAL.pdf

income Minnesotans will face in the coming years. The joint decision options in our joint September 9, 2025 filing offer a framework for thoughtful and deliberate review of Line Extension Allowance policies going forward, as uptake rates of electrification programs and gas and electricity prices evolve. ECC is particularly appreciative that affordability and ratepayer impacts are explicitly recognized as part of the Commission's future considerations for line extension tariffs.

The joint decision options propose to establish maximum distances for free footage allowances, ensuring that expansion of the gas system remains consistent with the public interest. They also call for new or amended ECO programs for single-family new construction that encourage higher efficiency building practices and support installation of heat pumps, without tying program participation to the use of specific natural gas appliances. These steps are important because they help new construction move toward cleaner and more efficient technologies, while avoiding program structures that could create barriers or lock-in additional costs for customers.

We also see value in the requirement that utilities demonstrate how their line extension tariffs align with Minnesota's greenhouse gas reduction goals, affordability protections, and related regulatory processes such as integrated resource planning, ECO plans, and Natural Gas Innovation Act plans. This integrated approach ensures that decisions about infrastructure expansion are made in context, not in isolation, and that consumer protections remain a central consideration.

Finally, ECC supports the joint recognition that Minnesota must continue exploring dual-fuel approaches. Xcel Energy's commitment to review models such as the Hydro-Québec/Énergir example and report back in its first gas integrated resource plan provides a practical way to evaluate how these strategies might fit Minnesota's climate, affordability, and reliability needs. Importantly, we encourage that any future dual-fuel discussions also include analysis of how low- and moderate-income households can participate equitably and what role affordability programs can play in holding low-income customers harmless through the energy transition.

In closing, ECC believes the joint decision options provide a strong foundation for the Commission to move forward. They reflect a collaborative effort to reconcile the state's decarbonization goals with the affordability and equity concerns that are central to our mission. We thank the Commission for its ongoing attention to these issues and for creating space for organizations like ours to bring forward the perspective of those most affected by changes in utility policy.

Sincerely,



George Shardlow
Executive Director
Energy CENTS Coalition

Re: In the Matter of a Commission
Evaluation of Changes to Natural Gas Utility
Regulatory and Policy Structures to Meet
State Greenhouse Gas Reduction Goals

PUC Docket No. G999/CI-21-565

AFFIDAVIT OF SERVICE

George Shardlow certifies that, on September 9, 2025, he submitted, by electronic filing, a true and correct copy of the letter of the Energy CENTS Coalition in the above-referenced matter, to the individuals on the attached service list.



George Shardlow



Kristen Syverud

Subscribed and sworn to me this 9th day of September, 2025.

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