

September 11, 2024

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

RE: Center for Energy and Environment, Citizens Utility Board of Minnesota, Minnesota Department of Commerce, Division of Energy Resources, LIUNA Minnesota and North Dakota, International Union of Operating Engineers Local 49, Office of the Minnesota Attorney General, Residential Utilities Division, Xcel Energy, CenterPoint Energy, Minnesota Center for Environmental Advocacy, Fresh Energy, Sierra Club, and Building Decarbonization Coalition's Preferred Decision Option Revision to "CUB/CEE New A" in the Matter of a Commission Investigation into Gas Utility Resource Planning

Docket Numbers G008, G002, G011/CI-23-117 and G999/CI-21-565

Dear Mr. Seuffert,

Center for Energy and Environment, Citizens Utility Board of Minnesota, the Minnesota Department of Commerce, Division of Energy Resources, LIUNA Minnesota and North Dakota ("LIUNA"), the International Union of Operating Engineers Local 49 ("IUOE 49"), Office of the Minnesota Attorney General, Residential Utilities Division, Xcel Energy, CenterPoint Energy, Minnesota Center for Environmental Advocacy, Fresh Energy, Sierra Club, and Building Decarbonization Coalition respectfully submit this letter to the Minnesota Public Utilities Commission ("Commission") providing a revised preferred Decision Option for consideration at the September 12, 2024 Commission agenda meeting, in the matter of a Commission investigation into gas utility resource planning.

After filing preferred decision options on Monday at the request of Commission Staff, the aforementioned parties continued to work collaboratively on language to address concerns expressed by LIUNA and IUOE 49 regarding the proposed decision options "CUB/CEE New A" and

“CUB/CEE New B.”¹ We, jointly, propose the following language as a preferred decision option to replace the previously proposed “CUB/CEE New A.”

Amend Ordering Paragraph 3 of the March 27, 2024 Order in this docket as follows: “Integrated resource planning for natural gas utilities includes analysis and evaluation of the appropriate resource mix, including supply-side and demand-side resources to serve customer end-use energy needs, and consideration of new infrastructure investments ~~above a defined threshold~~ necessary to meet existing or forecasted gas demand needs. Infrastructure investments for routine maintenance, safety, public works accommodation, integrity, and reliability are not part of the integrated resource planning process or analysis, except for the purpose of determining the cost of supply- and demand-side resources on an equal basis for resource selection~~and~~. Existing proceedings covering procurement and cost recovery of natural gas supply, transportation, and storage should continue independently from this proceeding.

With the revised decision option above, the undersigned parties support “CUB/CEE New B” as proposed in Joint Preferred Decision Options filed on September 9, 2024 in this docket, and included below.

CUB/CEE NEW B: Amend Ordering Paragraph 55 of the March 27, 2024 Order in this docket as follows: "Distribution system investments related to routine maintenance, public works accommodation, integrity, reliability, and safety are not part of the ~~integrated resource planning process or~~ expansion alternatives analysis."

Please contact Audrey Partridge at apartridge@mncee.org with any questions.

Sincerely,

/s/Audrey Partridge
Director of Policy
Center for Energy and Environment

/s/Annie Levenson-Falk
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¹ CUB/CEE New A and CUB/CEE New B were included in the Joint Preferred Decision Options filed on September 9, 2024.

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-117_Official List
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