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July 19, 2024

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

VIA ELECTRONIC FILING

Re: In the Matter of a Commission Investigation into Gas Utility Resource Planning

Docket No. G002, G008, G011/CI-23-117

Reply Comments of Minnesota Energy Resources Corporation

Dear Mr. Seuffert:

On May 7, 2024, the Minnesota Public Utilities Commission (“Commission”) issued a Notice of Extended Comment Period (“Notice”) requesting comments be filed in the above-referenced docket.

On May 31, 2024, Minnesota Energy Resources Corporation (“MERC” or the “Company”), Northern States Power Company, doing business as Xcel Energy (“Xcel”), and CenterPoint Energy Minnesota Gas (“CenterPoint”), (collectively, the “Gas Utilities”) filed Straw Proposals in the above-referenced docket. The intent of the Straw Proposals was to explain additional filing requirements for each component of a Natural Gas Utility Integrated Resource Plan (“Gas IRP”) and to better inform utility plans before they are filed with the Commission. In their Straw Proposals, the Gas Utilities provided clarifications to specific Order Points from the Commission’s Order Establishing Framework for Natural Gas IRP issued on March 27, 2024 (the “March 27, 2024 Order”), as well as providing additional proposed decision options for the Commission to consider.

On June 28, 2024, MERC and interested parties submitted Initial Comments on the topics identified in the Commission’s Notice. MERC provides these Reply Comments and responds to interested parties’ Initial Comments where warranted. MERC supports Center for Energy and Environments’ (“CEE”) recommendation that the Commission “maintain flexibility in the natural gas IRP requirements at this time so that the natural gas utilities, stakeholders, and regulators can learn and develop the best practices for

natural gas resource planning in Minnesota over time.”¹

1. What, if any, additional filing requirements should the Commission adopt for natural gas integrated resource plans (Gas IRPs)?

MERC responds to a number of additional filing requirements proposed by parties related to the following topics:

- Consideration of the State’s economy-wide greenhouse gas (“GHG”) reduction statutory goal(s)²
- Externality costs
- Load Forecasting
- Expansion Alternative Analyses (“EAA”)

Consideration of the State’s economy-wide greenhouse gas (“GHG”) reduction goals

In their May 31, 2024 Straw Proposal, Xcel proposed a decision option on this topic to further clarify the Order Point 4 from the Commission’s March 27, 2024 Order, as follows:

Xcel Proposed Decision Option 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.

In their June 28, 2024 Initial Comments, the Minnesota Department of Commerce, Division of Energy Resources (the “Department”) and CEE supported Xcel’s proposed decision option. MERC also supports Xcel’s proposed decision option.

In their June 28, 2024 Initial Comments, the Citizens Utility Board of Minnesota (“CUB”) asked the Gas Utilities to provide an additional description of how emission factors from NGIA plans will be considered in the Gas IRP.³ Lastly, both CUB and the Clean Energy Organizations (“CEOs,” which consist of Fresh Energy, Minnesota Center for Environmental Advocacy, and Sierra Club) recommended to the Commission that the Gas Utilities provide a narrative description of how their preferred plan is estimated to meet the net zero GHG emissions by 2050 goal, or if it is not, why it is still the preferred

¹ CEE Initial Comments at 3 (June 28, 2024).

² Minn. Stat. § 216H.01 and 216H.02

³ CUB. Initial Comments at 4 (June 28, 2024).

plan.⁴

In response to CUB's request for information, MERC would note that not only has MERC not filed an NGIA plan, but also that NGIA plans are optional endeavors for gas utilities in Minnesota. Additionally, at this point in time, MERC has only just started to design processes to formulate and develop a Gas IRP, and does not yet know how certain pieces of information will specifically be developed, captured, applied, or incorporated. MERC intends to continue participating in stakeholder meetings as the development of Initial Gas IRPs progresses, and would expect that during these continued conversations, the "how" for many facets of the Gas IRP will be discussed and developed further.

Lastly, MERC continues to emphasize that Minnesota Statutes contain GHG reduction goals – not mandates – and that these goals are not specific to the gas utility sector. Minn. Stat. § 216H.02 provides that "it is the *goal* of the state to reduce statewide GHG emissions across *all sectors* producing GHG emissions to net zero by 2050." [Emphasis added] While the Commission concluded that the economy-wide greenhouse gas reduction goal is "relevant to gas resource planning and should inform the utilities' short-term goals," the Commission did not include requirements for utility IRPs to meet those economy-wide goals. Again, MERC supports Xcel's proposed decision option and believes it appropriately and adequately captures consideration of GHG emissions, consistent with the Commission's March 27, 2024 Order and Minnesota statutes.

Externality costs

In their May 31, 2024 Straw Proposal, Xcel proposed a decision option on externality costs:

Xcel Proposed Decision Option 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.

In June 28, 2024 Initial Comments, CenterPoint, the Department, CUB, CEE, and CEOs expressed support for Xcel's proposed decision option. MERC also supports Xcel's proposed decision option.

In June 28, 2024 Initial Comments, CUB additionally asked the Gas Utilities to provide in Reply Comments how, and to what extent, they intend to incorporate externality costs into their Gas IRPs.⁵ In response to CUB's request for information, and as previously noted, at this point in time, MERC has only just started to design processes to formulate and develop a Gas IRP, and does not yet know how certain pieces of information will

⁴ CUB Initial Comments at 4 (June 28, 2024); CEOs Initial Comments at 1-2 (June 28, 2024).

⁵ CUB Initial Comments at 4 (June 28, 2024).

specifically be developed, captured, applied and/or incorporated. MERC intends to continue participating in stakeholder meetings as the development of Initial Gas IRPs progresses, and expects that during these continued conversations, the “how” for many facets of the Gas IRP will be discussed and developed further.

Lastly, CEE asked that Gas utilities and other parties comment on the appropriateness of applying either the regulatory cost of carbon established through Minnesota Statute §216H.06 or the natural gas environmental compliance factor applied through ECO to natural gas IRPs through reply comments to this docket.⁶ There was productive discussion on this topic in the July 12, 2024 Gas Utility Innovation Roundtable meeting, and MERC looks forward to hearing other parties’ recommendations.

Load Forecasting

The Commission’s March 27, 2024 Order specifies that “[u]tilities shall provide utility load and customer forecast in their resource plans,” and that utilities must “provide a high, medium, and low load forecast, along with relevant assumptions, in their resource plans.”⁷

In June 28, 2024 Initial Comments, the CEOs recommended that the Commission adopt additional requirements for utility load and customer forecasting, as follows:

CEO Proposed Decision Option 5.: Each Gas IRP 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 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).

MERC does not agree with such a prescriptive approach, as recommended by the CEOs. While the items listed in CEOs Proposed Decision Option 5 may or may not be able to be incorporated into a utility’s load forecast, MERC reiterates that the

⁶ CEE Initial Comments at 6 (June 28, 2024).

⁷ March 27, 2024 Order at 10-11 (Order Points 39-41).

Commission initiated the Gas IRP docket to “establish content and procedural requirements” for Gas IRPs.⁸ At this point in the process, such additional prescriptions regarding load forecasting are not warranted. The Commission may require additional specificity as the Gas IRP process evolves over time.

Expansion Alternative Analyses (“EAA”)

In June 28, 2024 Initial Comments, the Building Decarbonization Coalition (“BDC”) and the CEOs recommended similar proposed decision options on this topic⁹:

BDC Proposed Decision Option 2: For Utilities to adopt an investment threshold that allows the pool of eligible capacity expansion projects being assessed for expansion alternatives analysis to significantly exceed the 2-3 project requirement so utility staff can reasonably apply equity criteria in the selection of 2-3 projects.

CEOs Proposed Decision Option 6: Utilities shall employ a cost threshold that casts a wide net of projects for consideration for alternatives analyses for initial resource plans.

MERC recommends that the Commission set a specific investment threshold, rather than accepting a generalized decision option as proposed by, or similar to those proposed, BDC and the CEOs. For MERC, the Company recommends the Commission set the threshold at \$1 million for the Initial Gas IRP. Based on the historical information provided by the Company in its June 28, 2024 Initial Comments, a \$1 million threshold would provide a pool of six projects from which to choose two to three projects on which an EAA could be conducted. MERC believes that this would be an adequate pool given MERC’s size, service territory, and historical activity of expansion projects.

Additionally, while the Company agrees with CUB’s statements page 8 of their June 28, 2024 Initial Comments that MERC forecasted in their 2023 rate case \$5 million in investments made for main extensions and new area growth, and \$5.4 million in investment made for “new gas services,” MERC notes that these are **total** MERC investment amounts across our entire service territory, not individual project amounts. As stated previously, the Company does not forecast main and service growth projects at the individual project level.

MERC also agrees with CUB’s identification in their June 28, 2024 Initial Comments that MERC’s Worthington Project and Rochester Natural Gas Expansion Project are

⁸ March 27, 2024 Order at 3.

⁹ CUB also recommended that while the initial IRPs only require a complete alternatives analysis on two to three projects, the threshold for picking those projects should not be so high as to only identify two to three eligible projects at the outset. CUB stated it would make a final recommendation on the question of cost thresholds in reply comments. CUB Initial Comments at 9-10 (June 28, 2024).

examples of projects that would qualify as projects within the pool eligible to be selected for an EAA.¹⁰ Both the Worthington and Rochester projects are included in the data provided by MERC in its June 28, 2024 Initial Comments depicting projects from the 2018 to 2023 historical period at the various dollar thresholds requested: the Rochester project comprises the only project greater than \$15 million, and the Rochester and Worthington projects are the only two projects listed in the greater than \$3 million, \$5 million, and \$10 million thresholds. The point that MERC was trying to relay in its Straw Proposal was not that MERC does not complete expansion projects, but rather that determination of an appropriate threshold amount for MERC may pose difficulty given that the Company does not undergo significant capital investment expansion projects frequently. To that point, the Rochester and Worthington projects are the only two expansion projects over \$3 million MERC has completed in the last five years.

In June 28, 2024 Initial Comments, CUB, CEE and the CEOs all proposed either decision options or recommendations to the Commission that stakeholders be involved in the selection of the projects for EAA in the Gas Utilities' Initial Gas IRPs.¹¹ While MERC agrees that stakeholder engagement will be key during the Gas Utilities' Initial Gas IRPs, the Company recommends that the Commission leave the ultimate decision making to the Gas Utilities. In alignment with the Commission's Order Point 54: For initial utility resource plans, **utilities** shall identify two to three significant upcoming capacity expansion projects in each utility resource plan for a full alternatives evaluation.¹² While MERC agrees that stakeholder engagement will be beneficial throughout the processes of completing Initial Gas IRPs, including evaluation of projects for EAA, the Company should be the ultimate decision maker in choosing the two to three projects for EAA, given the Company's expertise with respect to its distribution system and associated considerations relevant to expansion projects.

In June 28, 2024 Initial Comments, the CEOs recommended that the Gas Utilities utilize a three-step framework for the consideration of alternatives for EAA.¹³ MERC has only just started to design processes to formulate and develop a Gas IRP, including the EAA process, and does not yet know how certain pieces of information will specifically be developed, captured, applied and/or incorporated. MERC intends to continue participating in stakeholder meetings as the development of Initial Gas IRPs progresses, and expects that during these continued conversations, the "how" for many facets of the Gas IRP will be discussed and developed further. MERC would recommend the Commission not adopt the CEOs' recommendation of a three-step

¹⁰ CUB Initial Comments at 8-9 (June 28, 2024).

¹¹ CUB Initial Comments at 10 (June 28, 2024), CEE Initial Comments at 20 (June 28, 2024); CEOs Initial Comments at 10 (June 28, 2024).

¹² March 27, 2024 Order at 12 (emphasis added).

¹³ CEOs Initial Comments at 8-13 (June 28, 2024).

framework for EAA, as it is too prescriptive at this point in time.

In June 28, 2024 Initial Comments, the CEOs recommended these proposed decision options on the topic of EAA:

CEO Proposed Decision Option 7: For projects above the investment threshold for the expansion alternatives analysis, a utility shall provide a full alternatives evaluation or justify why the project was not selected for a full alternatives evaluation. [Emphasis added]

CEO Proposed Decision Option 8: Each utility must include a summary of its discussions with stakeholders regarding the selection of projects for the expansion alternatives analysis.

As stated above, MERC believes that stakeholder engagement will be beneficial to the entire Initial Gas IRP process, where the framework for future Gas IRPs will be developed, which will include the stakeholders engagement in evaluation of projects for EAA.¹⁴ As part of this stakeholder engagement during the development and completion of Initial Gas IRPs, the Company envisions that stakeholders would be a part of, and therefore aware of, the discussions regarding selection of the projects for the EAA through the Gas Utility Innovation Roundtable¹⁵. Therefore, to require the Gas Utilities to include a narrative on such discussions in the Gas IRP would be redundant.

Lastly, depending on the number of projects meeting the threshold, there could be a significant number of projects not chosen for an EAA. To require the Gas Utilities to provide information and justification on all of the projects not chosen would be burdensome, with limited or uncertain additional value added. Additionally, if stakeholders wanted additional information on justification for why specific projects were not chosen for an EAA that was not gleaned from previous stakeholder discussions and engagement, they could request that information from the Gas Utilities. For these reasons, MERC recommends the Commission not adopt CEO's proposed decision options listed above.

2. Three utilities have been instructed to file Gas IRPs on a staggered filing schedule. Which utility should file its plan first and why? When should that

¹⁴ Note, while the Company believes that stakeholder engagement will be beneficial to the entire Initial Gas IRP process, including stakeholder participation in the evaluation of projects for EAA, the Company believes that the ultimate decision on which projects to choose for EAA should lie with the utility.

¹⁵ The Gas Utility Innovation Roundtable is the stakeholder meetings facilitated by the Great Plains Institute ("GPI"), which are typically held monthly. The Notice of Stakeholder Engagement Timeline and Docket Process was filed on April 11, 2023 in Docket Numbers G008, G002, G011/CI-23-117 and G999/CI-21-565.

plan be filed? When should the other utilities file their plans?

In June 28, 2024 Initial Comments, Xcel, the Department, CUB, and CEE proposed that Xcel be the first gas utility to file a Gas IRP in late 2026. The Department, CUB, and CEE expanded further, proposing that CenterPoint file second in 2027, and MERC file third in 2028. The Department also proposed an October 1 filing date for Gas IRPs. MERC does not oppose this recommended order of utility filing, but continues to recommend an extended timeline between the first and second Gas IRP filing.

In June 28, 2024 Initial Comments, MERC proposed that the Commission allow 24 months between the filing of the first Gas IRP and the second Gas IRP to allow the second utility to gain knowledge and lessons learned from the first utility's initial Gas IRP filing and provide adequate time for the second utility to incorporate those lessons learned along with feedback from stakeholders and determinations from the Commission that will be provided via comment periods and final orders from the first utility's initial Gas IRP docket. Based on the proposals above, this would indicate Xcel filing their Initial Gas IRP on October 1, 2026, and with MERC's cadence proposal, would result in CenterPoint filing its initial Gas IRP on October 1, 2028. In support of this recommendation, MERC reiterates its position that the filing of the first Gas IRP is going to be a learning process, and believes that it could be beneficial to allow the second utility more than 12 months to incorporate lessons learned or Commission determinations from the first utility's Gas IRP docket. Additionally, the cadence of the filings presumes that each utility's Gas IRP docket will be completed within 12 months. MERC believes that, due to the Gas IRPs being a new type of proceeding in Minnesota, this assumption may be potentially aggressive – particularly for the very first Gas IRP filing. MERC would suggest that the Commission consider revisiting the filing schedule and cadence if the first Gas IRP filing takes longer than 12 months, shortly after the conclusion of the first Gas IRP.

3. For Xcel Energy, what, if any, direction should the Commission give regarding Xcel's analysis and reporting on methane emissions?

As explained in the Commission's Notice, for Xcel Energy only, the Commission moved reporting of 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 – from Xcel's performance-based regulation annual reports to this Natural Gas Resource Plan

docket.¹⁶

In their May 31, 2024 Straw Proposal, Xcel proposed the following decision option on this topic:

Xcel Proposed Decision Option 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.

In June 28, 2024 Initial Comments, the Department and CEE supported Xcel's proposed decision option.

CUB and CEO recommended expanding reporting of methane emissions for all Gas Utilities to include upstream methane emissions data.¹⁷ Additionally, CUB asked the Gas Utilities to provide an update on availability of their upstream methane emissions data in reply comments.¹⁸

In response to CUB's request for information, MERC does not currently have information regarding upstream emissions. The Company agrees with Xcel's comments in their May 31, 2024 Straw Proposal, and notes that upstream emissions would account for a small percentage or amount of total GHG emissions. The Company recommends that the Gas Utilities focus on providing data and information that is available, and continue to improve processes and reporting as the Gas IRP progresses.

4. Are there other issues or concerns related to this matter?

MERC responds to two other issues raised by parties:

- MERC's request for deferred accounting treatment and
- Recommendations to require the Gas Utilities to work closely with stakeholders in the development of the Initial Gas IRPs.

Deferred Accounting Treatment

¹⁶ See *In the Matter of the Commission Investigation to Identify and Develop Performance Metrics and, Potentially, Incentives for Xcel Energy's Electric Utility Operations*, Docket No. E002/CI-17-401, Order Accepting 2021 and 2022 Reports, Suspending Decisions and Baselines and Targets, and Modifying Reporting Requirements at 6 (Jan. 26, 2024).

¹⁷ CUB Initial Comments at 11 (June 28, 2024); CEOs Initial Comments at 4 (June 28, 2024).

¹⁸ CUB Initial Comments at 11 (June 28, 2024).

In its May 31, 2024 Straw Proposal, MERC proposed the following order point:

MERC Proposed decision option: Utilities are allowed deferred accounting treatment of costs associated with developing and implementing a Gas IRP process for reporting, conducting a Gas IRP, the costs associated with the regulatory process for the Gas IRP filings, and implementing a Gas IRP once approved by the Commission.

CUB and the OAG recommended that the Commission deny MERC's proposed decision option. With respect to costs to develop and implement the Gas IRP process and intervenor compensation, the Department requested that MERC provide additional support for defining the process-related Gas IRP costs as being significant for deferred accounting purposes in its Reply Comments, stating that the Department would provide a recommendation as to the reasonableness of allowing deferred accounting for gas IRP process-related costs in supplemental comments based on review of MERC's response.

With respect to deferred accounting for resources that are approved through the Gas IRP process but are not yet approved for cost recovery in a rate case, the Department concludes "This is not an issue that the Commission needs to resolve at this stage of the gas IRP process. Waiting to determine whether the costs of a specific, significant project once a detailed series of cost estimates have been developed is a preferable approach."¹⁹

As explained in MERC's Straw Proposal, if a Gas IRP filed by the Company and approved by the Commission contained a significant expansion project, it would be unreasonable for the Company to be required to implement or start construction on a significant expansion project without first receiving Commission approved cost recovery. The Company does not agree with the Department's recommendation that the utility be required to file its deferred accounting request at that time, since the requirements for approval of deferred accounting are met with respect to such significant investments to be approved through a Gas IRP. As the Commission has recognized,

Deferred accounting is a regulatory tool used primarily to hold utilities harmless when they incur out-of-test-year expenses that, because they are unforeseen, unusual, and large enough to have a significant impact on the utility's financial condition, should be eligible for possible rate recovery in the next rate case. Deferred accounting has also been permitted when utilities have incurred sizeable expenses to meet

¹⁹ Department Initial Comments at 12 (June 28, 2024).

important public policy mandates.²⁰

MERC continues to request the Commission allow deferred accounting treatment for costs associated with the development and implementation of Gas IRPs. MERC acknowledges that the Company does not have detailed cost estimates on developing its Initial Gas IRP, but even without detailed costs estimates, there is no denying that the process to create an Initial Gas IRP will be complex and resource intensive under the framework the Commission has already established, even without adoption of the significant additional parameters and information being proposed by parties in Comments. Nor could these costs have been contemplated when MERC developed its rate case and are therefore not reflected in the Company's rates. As a testament to complexity, the topic of creating a Gas IRP process has been discussed by stakeholders and involved multiple rounds of comment periods over the past 15 months and remains active. Even if the Commission does not order MERC to file its Initial Gas IRP until late 2028, the development of the Gas IRP will require MERC to incur substantial regulatory and operational costs that are not currently recovered in base rates. Gas utilities will require significant additional resources, such as additional employees, the assistance of third party consultants, additional modeling software systems, and training to develop and implement Gas IRPs. Additionally, as discussed in various parties' comments, stakeholder involvement is expected to continue through the development of the Gas Utilities' Initial Gas IRPs, and with that will also come additional costs and potentially additional intervenor compensation requests.

Costs associated with the development and creation of a Gas IRP were not known at the time of MERC's 2023 general rate case filing, and therefore could not have been included in base rates.²¹ Denial of deferred accounting treatment for Gas IRP costs could potentially lead to an increase in the frequency of Gas Utilities filing general rate

²⁰ *In the Matter of Xcel Energy's Petition for Approval of Electric Vehicle Pilot Programs*, Docket No. E002/M-18-643, Order Approving Pilots with Modifications, Authorizing Deferred Accounting, and Setting Reporting Requirements at 18 (July 17, 2019); *see also In the Matter of a Petition by Minnesota Energy Resources Corporation for Approval of Farm Tap Customer-Owned Fuel Line Replacement Plan, Tariff Amendments, and Deferred Accounting*, Docket No. G011/M-17-409, Order Approving Phase 1 of Farm Tap Replacement Project with Conditions at 9 (Nov. 30, 2017) (finding that Deferred accounting "is used primarily to hold utilities harmless when they incur out-of-test-year expenses that, because of their nature or size, should be eligible for possible rate recovery as a matter of public policy"); *see also In the Matter of Peoples Natural Gas Company's Request to Establish a Tariff for Repairing and Replacing Farm Tap Lines*, Docket No. G011/M-91-989, Order Permitting Company to Continue Deferred Accounting (Feb. 17, 1998) ("[T]he Commission has long permitted non-standard accounting in special cases where companies would otherwise be at risk of not recovering the costs of programs they are required to administer to advance important public policy goals.").

²¹ MERC's last rate case filing, Docket No. G011/GR-22-504, based on a 2023 test year was filed on November 1, 2022. Parties to that proceeding reached a settlement through discussions and mediation held on April 6, 10, and 11, 2023. The Executive Secretary established this Gas IRP proceeding, Docket No. G008, G002, G011/CI-23-117, and issued its Notice of Stakeholder Engagement Timeline and Docket Process on April 11, 2023. Based on this timeline, it would not have been possible for MERC to incorporate costs associated with a Gas IRP into Docket G011/GR-22-504.

case petitions, which in turn, will increase needed resources to accommodate the regulatory oversight by all involved parties as well as the Commission.

Finally, in response to the OAG's claim that MERC had not identified the public policy mandate costs would be incurred to serve,²² MERC notes this proceeding to establish the contents and procedural requirements for natural gas resource planning was initiated upon the Commission finding that "natural gas resource planning is in the public interest," recognizing that "developing and implementing requirements for gas resource planning will be a new and complex endeavor."²³ The Commission has clearly established a public policy mandate for the development and implementation of Gas IRPs, while also recognizing that the resources required to develop and implement Gas IRPs would be significant.

The Company continues to recommend the following decision option:

MERC Proposed decision option: Utilities are allowed deferred accounting treatment of costs associated with developing and implementing a Gas IRP process for reporting, conducting a Gas IRP, the costs associated with the regulatory process for the Gas IRP filings, and implementing a Gas IRP once approved by the Commission.

Stakeholder Participation in Initial Gas IRPs

In June 28, 2024 Initial Comments, CEE proposed the following decision option:

CEE Proposed decision option: Natural gas utilities shall work through the Gas Utility Innovation Roundtable to engage and obtain input from stakeholders in the development of initial natural gas IRPs.

MERC is in agreement with CEE; to continue to engage stakeholders in the development of Gas Utilities' Initial Gas IRPs would be beneficial.

5. How should equity be incorporated into gas resource plans and the gas planning process?

MERC responds to a number of issues related to the topic of equity raised by parties:

- MERC's proposal that the Executive Secretary address equity in Docket No.

²² OAG Initial Comments at 5 (June 28, 2024).

²³ *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers*, Docket No. G-999/CI-21-135, Order Requiring Actions to Mitigate Impacts from Future Natural Gas Price Spikes, Setting Filing Requirements, and Initiating a Proceeding to Establish Gas Resource Planning Requirements at 21, 23 (Feb. 17, 2023).

G999/CI-21-565

- Utilization of mapping data to integrate equity impacts
- Gas Utilities should include a discussion of equity impacts on all of the projects in the five-year period may have
- Incorporate an equity-focused component to the Gas Utility Innovation Roundtable to inform the development of Gas IRPs.

Executive Secretary addressing equity in Docket No. G999/CI-21-565

MERC's seeks to clarify its statement in its May 31, 2024 Straw Proposal that "the topic of equity as it relates to utility programs, services and rates would be addressed by the actions of the Executive Secretary in Order Point 56 [from the Commission's March 27, 2024 Order], and not within the context of the Gas IRP itself." The Department interpreted MERC's statement to mean that the topic of equity be addressed by the actions of the Executive Secretary in Docket No. G999/CI-21-565 rather than in the context of the Gas IRP itself. MERC clarifies it was not the Company's intent to imply that equity be removed from this docket and instead have it fully discussed only in Docket No. G999/CI-21-565. Rather, consistent with the Commission's Order Point 56 in the March 27, 2024 Order in this docket, consideration of broader equity issues, such as development of new rate structures to address equity be taken up in Docket No. G999/CI-21-565 such that all utilities, not just MERC, CenterPoint, and Xcel, can have a voice and involvement in those discussions. As stated in MERC's Straw Proposal, "MERC believes that equity and the impact on low-income and vulnerable customers should be part of the establishment of any natural gas IRP framework." And to ensure clarity, MERC believes that equity and its impact on topics specifically within the scope of Gas IRP should appropriately be included in the development of Initial Gas IRPs.

Utilization of mapping data to integrate equity impacts

In their June 28, 2024 Initial Comments, CUB and the CEOs made similar recommendations on this topic:

CUB Recommendation: Incorporating this type of mapping information [referring to public data and mapping tools for low-income residents or disadvantaged communities] in both the five-year action plan, where the utility discusses equity impacts of a proposed project, and in the EAA section of the utility's plans.

CEO Proposed Decision Option 10: To integrate equity into alternatives analyses, utilities shall 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.

MERC does not agree with such a prescriptive approach, as recommended by CUB, but would not be opposed to CEO's proposed decision option which, in the Company's

opinion, affords flexibility to the Gas Utilities to evaluate the capability of overlaying available mapping and public data along with determining the practicality, workability, and effectiveness of such an application. MERC recommends the Commission adopt CEO's proposed decision option.

Discussion of equity impacts

In its May 31, 2024 Straw Proposal, Xcel proposed the following decision option, which addresses the topic of equity:

Xcel Proposed Decision Option 10: Integrated resource plans shall include a discussion of how equity was considered in the planning process.

In June 28, 2024 Initial Comments, the Department and CEE supported Xcel's proposed decision option. MERC also supports Xcel's proposed decision option.

In June 28, 2024 Initial Comments, CUB recommended that the Gas Utilities include a narrative discussion of equity impacts each project identified in the five-year action plan might have.²⁴ MERC believes that CUB's recommendation is redundant in light of Xcel's proposed decision option, which the Department, CEE, and MERC support, and in light of CEO's proposed decision option 10 discussed above. For these reasons, MERC recommends the Commission not adopt CUB's recommendation.

Equity-focused component to the Gas Utility Innovation Roundtable

In June 28, 2024 Initial Comments, CEE recommended:

CEE Recommendation: GPI incorporate an equity-focused component to the Gas Utility Innovation Roundtable to inform the development of natural gas utilities' IRPs.²⁵

Based on discussions with stakeholders and the June 28, 2024 Initial Comments, there seems to be consensus that stakeholders should be involved in the Gas Utilities' Initial Gas IRPs. MERC does not oppose CEE's recommendation to include equity in those ongoing stakeholder discussions.

Conclusion

The Company appreciates the opportunity to provide Reply Comments. Please feel free to contact me at richard.stasik@wecenergygroup.com or (414) 221-3685 with any questions.

²⁴ CUB Initial Comments at 3, 13 (June 28, 2024).

²⁵ CEE Initial Comments at 20 (June 28, 2024).

Mr. Will Seuffert
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DATED: July 19, 2024

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Richard F. Stasik", with a stylized flourish at the end.

Richard F. Stasik
Director– State Regulatory Affairs

cc: Service List

In the Matter of a Commission Investigation
into Gas Utility Resource Planning Docket Nos. G002, G008, G011/CI-23-117

CERTIFICATE OF SERVICE

I, Colleen T. Sipiorski, hereby certify that on the 19th day of July, 2024, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed Reply Comments of MERC on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 19th day of July, 2024.

/s/ Colleen T. Sipiorski
Colleen T. Sipiorski

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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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