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August 8, 2025

—Via Electronic Filing—

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

RE: REPLY COMMENTS
IN THE MATTER OF CHANGES TO NATURAL GAS UTILITY REGULATORY AND
POLICY STRUCTURES TO MEET STATE GREENHOUSE REDUCTION GOALS
DOCKET NO. G999/CI-21-565

Dear Mr. Bull:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to the Comments submitted by the Minnesota Department of Commerce, Office of the Attorney General and several other parties on July 8, 2025.

Portions of this filing is marked “Not-Public” as it contains information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). The information is Trade Secret Information because it derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.

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 Pamela Gibbs at 612-330-2889 or pamela.k.gibbs@xcelenergy.com or contact me at 612-330-7681 or lisa.r.peterson@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

LISA R. PETERSON
DIRECTOR, REGULATORY PRICING & ANALYSIS

Enclosures
cc: Service List

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State of Minnesota
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF A COMMISSION
EVALUATION OF CHANGES TO
NATURAL GAS UTILITY REGULATORY
AND POLICY STRUCTURES TO MEET
STATE GREENHOUSE GAS REDUCTION
GOALS

DOCKET NO. G999/CI-21-565

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to the May 5, 2025 NOTICE OF COMMENT PERIOD in this docket and to initial comments submitted in this proceeding.

As stated in our Initial Comments, the Company believes it is not appropriate to modify line extension policies at this time. It is important to allow customers, especially low-income and rural customers, to have affordable access to the resource of natural gas, which can provide heat and power efficiently and cost-effectively and – even in potential future scenarios with a significant amount of electrification of heating – will continue to be needed for supplemental heat in the coldest temperatures.

The Company shares the concerns voiced by many stakeholders regarding the need to reduce greenhouse gas (GHG) emissions. Accordingly, the Company has invested and will continue to invest significantly in zero and low-carbon resources to achieve its

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own net zero vision and Minnesota’s economy-wide net-zero greenhouse gas emission goal.¹ Minnesota has innovative and robust processes to continue these emission reduction efforts in a way that considers affordability, equity and customer demand, and we will continue to work through those processes to manage emission reduction efforts more holistically than possible through line extension policies. We know natural gas will continue to be needed to meet demand and reduce emissions through innovative solutions like dual fuel approaches.

Although the Company believes that it is not appropriate to substantially change the line extension allowance policies at this time, we agree that the transition to a lower carbon future requires on-going conversations and a periodic revisiting of policies to determine the appropriate mix of resources that best protects customers and the public interest as the transition continues.

REPLY COMMENTS

In addition to the Company, the following stakeholders submitted comments: Department of Commerce (Department), Office of the Attorney General (OAG), CenterPoint Energy, Minnesota Energy Resources Corporation (MERC), Center for Energy and Environment (CEE), Citizen Utility Board of Minnesota (CUB), Laborers’ International Union of North America (LiUNA), Housing First, Fresh Energy and Minnesota Center for Environmental Advocacy (Fresh Energy), Local Governments (consisting of representatives from St. Louis Park, Eden Prairie, Richfield, Edina, Hopkins, Bloomington, and the City of St. Paul), and Rewiring America (RWA). The following stakeholders submitted public comments: MN350 Action (MN350), Comunidades Organizando el Poder y la Acción Latina (COPAL), American Council for an Energy-Efficient Economy (ACEEE), the Midwest Building Decarbonization Coalition (MBDC), Leigh Pomeroy, and the American Lung Association (ALA).

There was significant overlap in stakeholders’ initial comments. We have organized our Reply Comments by topic.

¹ See Minn. Stat. § 216H.02, Subd. 1.

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I. LINE EXTENSION ALLOWANCE PROVIDES IMPORTANT BENEFITS TO NEW AND EXISTING CUSTOMERS

The Company believes that it is crucial for all customers to have equal access to the resource of natural gas, which heats homes more efficiently and cost-effectively than electric resistance as a source of supplemental heat during the coldest winter temperatures. Line extension allowance programs allow customers, especially those with low incomes, to affordably access natural gas heating without the barrier of substantial upfront costs. In addition, a line extension allowance based on average main and service lengths provides equitable access to natural gas – especially for suburban and rural customers who might be at the periphery of existing gas service territories, but also for new housing within the urban core – at a reasonable rate. This approach protects existing customers from bearing the entire cost of long extensions and allows the utility to recover its expenses.

Other stakeholders identified additional benefits to line extension allowance policies, such as playing a pivotal role in utilities’ ability to continue investing in their distribution systems which promotes safety and reliability for all customers,² facilitating local economic development and provision of key goods (e.g., grain drying),³ and maintaining a large and diverse base of customers which lowers customer costs and mitigates risk.⁴

II. A DUAL FUEL APPROACH, APPROPRIATE FOR MINNESOTA’S COLD CLIMATE, ACHIEVES SIGNIFICANT GHG REDUCTIONS

We agree with the comments of stakeholders that State and Company policy goals to reduce GHG emissions are most likely to result in throughput reduction on the gas system over time. However, that does not mean, as we pointed out in our Initial Comments, that the gas system is no longer needed today or in the future. Minnesota’s cold winter climate requires heating solutions that can provide efficient and affordable heating during the moderate portions of the heating season and during the coldest weeks of the year. Cold climate Air Source Heat Pumps (ASHPs) can be highly efficient in moderate temperatures, but even the most effective ASHPs available today have been shown to require supplemental heat during the coldest

² See MERC comments at 11.

³ See LiUNA comments at 2.

⁴ See LiUNA comments at 2.

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weeks of the year. Today, and for the foreseeable future, natural gas has been shown to be the most efficient and affordable supplemental heat option.⁵ This means that a natural gas distribution system will continue to be needed, even if throughput in that system declines and over time natural gas shifts from being a primary to largely a supplemental heating fuel. We agree with LiUNA that “[t]he more we learned about the operation of the gas utility system and the challenge of fully replacing gas with electricity . . . the clearer it became . . . that safe and reliable gas infrastructure capable of delivering fuel on the cold winter nights when it’s needed most will be used and useful for generations to come.”⁶

A number of stakeholders argued that reducing GHG emissions pursuant to Minnesota Statutes and achieving Minnesota’s Climate Action Framework goals requires elimination of line extension policies. The Company disagrees at this time.

First, Minnesota’s statutory goal to achieve net zero GHG emissions economy-wide by 2050 does not require the complete elimination of emissions from natural gas use, as discussed further below in Section III. In fact, a variety of measures will be needed to achieve these goals implemented over the long term. Weatherization and dual fuel approaches – advancing building electrification while keeping gas as a back up fuel – will be essential GHG reduction measures in cold climates like Minnesota. For example, a dual fuel approach towards new home decarbonization can reduce natural gas consumption by roughly 75 percent, while keeping electric system upgrades costs more manageable, relative to system upgrade costs that would be required using an all electric approach with electric resistance back up.⁷

⁵ See Housing First comments at 2 (“Given current technology limitations, electric heat pumps struggle to maintain necessary indoor temperatures during Minnesota’s coldest days. Efficiency begins to decline at 40°F and many models become ineffective between -5°F and -13°F.”).

⁶ See also LiUNA comments at 3 (“Further, in addition to helping to fund energy efficiency through ECO, extension of gas service brings customers into a regulatory framework that includes a gas resource planning process oriented to state climate goals, not to mention access and contributions to innovative decarbonization programs included in utility NGIA plans.”).

⁷ Internal modeling of a new single-family home with cold climate air source heat pump and gas furnace with switch over at 15 degrees Fahrenheit. There would be additional gas savings at a lower switchover point, however this would come with additional electric system capacity impacts and infrastructure investment requirements. A full-electrification approach to all new builds would require a very well thought out plan to address distribution, generation and transmission cost impacts to customers.

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Second, using a dual-fuel approach facilitates a thoughtful approach to decarbonization by allowing strategic electrification of building heating while still providing an affordable and reliable solution for the coldest winter temperatures. This allows customers to step into electrification choices that make sense for their budget and circumstances without forcing them to make an all-or-nothing commitment early on.

Extension of natural gas service brings customers into a regulatory paradigm that promotes energy efficiency and strategic electrification through the Natural Gas Innovation Act (NGIA), and a gas resource planning process that considers state climate goals⁸ along with top objectives for a reliable, safe, affordable gas system. As noted in our Initial Comments, the Commission's order in the Company's gas integrated resource (IRP) planning docket⁹ emphasizes GHG emission analysis, equity considerations, and the prioritization of cost-effective, low-emission resources as part of a planning process designed to determine the mix of resources that best protects customers and public interests; maintains safe, reliable, and affordable service; and advances Minnesota's state policy objectives. In this context, the Company's line extension allowance for new customers is grounded in the Commission's directive to evaluate all resources on a consistent and integrated basis. We do not believe that line extension policies should be changed until we have more information from this more robust and holistic IRP process about how the transition will unfold.

The benefit of a dual fuel approach to decarbonization in Minnesota is further supported by the stakeholder process and consensus recommendations report produced by Great Plains Institute and Center for Energy and Environment (G21 Report), which recognizes that the most cost-effective and reliable way to reduce emissions from the natural gas system in support of the state's net-zero greenhouse gas goal is weatherization with electric space heating adoption, while retaining gas service for back-up heat during cold temperatures.¹⁰ As LiUNA noted, "[t]he G21 report provided the initial evidence that a 'dual fuel' approach to decarbonization was not just more resilient and less risky than pursuit of either full electrification or full

⁸ See LiUNA comments at 3.

⁹ Order of October 23, 2025, Gas IRP Comprehensive Requirements at 1, in Docket No. G008, G-002, G011/CI-23-117.

¹⁰ See Great Plains Institute, Center for Energy and Environment, 2021. "Decarbonizing Minnesota's Natural Gas End-Uses." <https://e21initiative.org/wp-content/uploads/2021/07/Decarbonizing-NG-End-Uses-Stakeholder-Process-Summary.pdf>.

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reliance on clean fuels, but also likely to be the least-cost option *before* pricing in the benefits of resilience and risk mitigation.”¹¹

We note that CUB claimed that “the findings of the G21 Report support elimination of [line extension allowances] now,”¹² and that the G21 Report “agree[s] that eliminating gas expansion to new buildings is an immediate first step.”¹³ The Company disagrees with these assertions. The Consensus Recommendations listed on pages 3-6 of the G21 Report were discussed at length by the G21 participants, and the authors took care to include all Recommendations for which consensus existed. The 25 Consensus Recommendations do not include elimination of (in fact, do not even mention) line extension allowances.

III. RISK OF STRANDED ASSETS

Several commenters argue that the state’s current line extension allowance policy exposes customers to stranded asset costs. This line of argument appears premised on three linked assumptions:

- New gas infrastructure installed today will not be used for its full amortized life,¹⁴
- Wealthier customers will depart the gas system by fully electrifying their homes and operations, while lower-income customers continue to use gas as their primary fuel,¹⁵ and
- Gas rate structures in place today will remain unchanged, leaving customers who remain on the gas system to pay the full costs of that lower-throughput system in much higher volumetric rates.¹⁶

The Company agrees that if all three of those assumptions were borne out – in other words, if utilities and the Commission did nothing over the coming decades to avoid these outcomes – stranded cost issues would likely arise. However, each of these assumptions is unsubstantiated.

¹¹ LiUNA comments at 1.

¹² CUB comments at 12.

¹³ CUB comments at 14.

¹⁴ *See, e.g.*, CUB comments at 14.

¹⁵ *See* MN350 public comment at 1; MBDC public comment at 4; COPAL public comment at 2.

¹⁶ *See* Rewiring America comments at 13.

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First, the assertion that new gas infrastructure will not be able to be used until fully amortized is usually premised either on declarations of a climate “imperative” that gas cannot be used beyond mid-century, or on a misinterpretation of Minnesota’s GHG statutory goals to suggest that the State’s economy-wide net zero GHG goal means there can be no natural gas use past 2050. The statute does not require this, however; it sets a goal that “statewide greenhouse gas emissions across all sectors producing greenhouse gas emissions” be reduced to net zero by 2050.¹⁷ This means that *aggregate* (“across all sectors producing greenhouse gas emissions”) economy-wide GHG emissions should reach *net* zero by 2050. Remaining emissions in some economic sectors beyond 2050, including from natural gas use, would need to be offset by greater emission reductions in other sectors, and/or by sequestration in forests and agricultural lands, to achieve net zero economy-wide emissions.

Second, it is true that wealthier customers – primarily because they have greater home ownership rates and more up-front capital and/or access to financing than lower-income customers – are likely to have more ability to weatherize their homes and install electric heating alternatives. These options have high upfront costs. But the State of Minnesota, Xcel Energy, and other utilities are actively working to make electric and dual fuel heating systems more accessible to lower-income customers and renters as well. Additionally, there appears to be an adequate planning horizon as currently adoption rates of electrification technologies are not high at any income level. Accordingly, we do not believe there is basis to assume, as RWA appears to, that Minnesota will pursue an “unmanaged transition.”¹⁸

Third, the Commission has sufficient time to adjust rates as needed and has already expressed plans to “consider changes to rates needed to maintain affordable and equitable utility service.”¹⁹ That process – rather than the current comment period limited to line extension allowances – would be the appropriate venue for a robust discussion on how Minnesota might adjust its current rate structures to maintain affordable and equitable service, as well as avoid stranded costs borne by gas customers.

¹⁷ Minn. Stat. § [216H.02](#), Subd. 1.

¹⁸ Rewiring America comments at 2 (internal quotation omitted). *See id.* at 2-3.

¹⁹ Notice of January 17, 2025 in Docket No. G999/CI-21-565 at 2.

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IV. THE COMPANY'S LINE EXTENSION ALLOWANCE CALCULATION

A. Typical Line Extension Analysis

The Company provides an analysis of the typical Residential customer line extension allowance in Attachment A. It contains the costs and revenues for a single Residential customer. Costs include 80 feet of main, 75 feet of service, and the corresponding cost for labor and materials to tie into the main, plus costs for the riser, regulator, and meter set. Revenues are based on current Residential base rates. The analysis shows that by year 4, there is a revenue sufficiency.

The Company considered stakeholder concerns that line extension allowances drive up the cost of rates for other customers. Based on the Company's analysis in Attachment A, a single Residential customer extension provides a revenue deficiency of \$16 in year 1, dropping to \$12 in year 2, and \$2 in year 3. If the Company had 3,500 Residential line extensions in a year, that equates to approximately \$56,000 of revenue deficiency in year 1. Assuming the Residential class were to pay for this deficiency, the impact would be approximately 1 cent per month for the 454,000 Residential customers. The Company believes this to be a reasonable impact. Also of note, the new customers would be sharing in the cost of the Company's riders such as the Gas Utility Infrastructure Cost Rider, Conservation Improvement Program Rider, Gas Affordability Program Rider, and the Natural Gas Innovation Act Cost Rider. Therefore, system customers are likely to see a benefit earlier than year 4 when taking into account the downward pressure that new sales would put on the riders.

The OAG discussed different ways to measure the benefit to the system from a customer who takes service under a typical main and service extension, including 1) annual revenue versus revenue requirement, 2) cumulative net present value of the revenue versus revenue requirement, and 3) cash flow analysis. The Company agrees that it is appropriate to perform a periodic review of whether allowances for typical extensions are providing benefit to the system, and notes that measures 1 and 2 above are more typically used for this type of analysis. Attachment A shows measures 1 and 2 in columns 18 and 20, respectively.

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B. Critiques of the Company’s Line Extension Calculations

Several stakeholders had critiques of line extension allowance calculations, including the OAG, Rewiring America, and Fresh Energy.

1. Initial Amount of Gas New Customers will Use

The OAG hypothesized that “Minnesota gas utilities likely overstate the initial amount of gas new customers will use” because “[a]ssuming new residential gas customers will consume the same amount as an average residential customer is unreasonable because new buildings tend to be more energy efficient and use less gas.”²⁰ The Company, however, does not use an assumption of an average residential customer to determine the initial amount of gas a customer will use. Instead, the line or main extension allowances for residential customers are based on information from the builder or developer on size of equipment, total BTU loads, size of home, number of gas appliances, and hours of operation. This approach accounts for the increasing energy efficiency over time of residential buildings. Commercial services and main projects are justified based on the actual customer’s estimated loads and hours of use.

2. Customer Usage over Time

The OAG and Rewiring America hypothesized that new customer consumption of natural gas will decrease over time due to investments in energy efficiency technologies, which will cause utilities to under-recover the costs of line extensions, shifting the shortfall to existing customers.²¹ The Company disagrees. As discussed in Section IV.A, system customers begin to see a benefit in year 4 from new customers with typical line extensions. The Company believes it is a reasonable assumption that customers purchasing new construction homes will have new heating equipment which likely will maintain the same level of usage over this payback period..

3. Including the Cost of Meters in the Line Extension Allowance Calculation

The OAG argues that utilities should include the cost of meters in its line extension allowance calculation, and states that “Xcel appears not to include the cost of a meter

²⁰ OAGs comments at 25-26.

²¹ See OAG comments at 26-27; Rewiring America comments at 4.

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in its justification for its free footage allowance.”²² The Company clarifies that we include meter costs in our cost justification analysis. We have revised our response to Fresh Energy IR 2, and provide it as Attachment B.

4. Fresh Energy’s Comments

In its Javelina Energy Report, Fresh Energy asserts that Minnesota utilities’ line extension calculations underestimate the costs of adding customers to the system and overestimate new customers’ future gas usage, resulting in considerable cost increases for existing utility customers. As discussed below, the Company disagrees with several aspects of this analysis the Javelina Energy Report applied to the Company:

- Construction costs – The Javelina Energy Report claims that Minnesota’s gas utilities are not using up-to-date costs in their line extension calculations. To support this claim in regard to the Company, the report references the Company’s response to Fresh Energy’s Information Requests (IRs) 3 (service costs) and 4 (mains costs).

The mains and services costs addressed in these IR responses included costs for both new and replacement projects. Replacement projects may include costs for system reinforcements, reconstruction, and restoration work that is not and should not be included in the Company’s cost per footage of new construction for mains and service extensions. To the extent that system reinforcement, reconstruction or restoration costs are identified in a line extension project scope, those costs would be included as unusual costs in the cost justification modeling for the project. Additionally, the service line costs of \$21.38 per foot that the Javelina Energy Report states as the actual 2024 cost includes the total cost of all customer classes and not just the Residential class, and therefore is not directly comparable nor appropriate to use as a Residential Service cost.

The Company’s source for service and mains cost for new construction are shown in Table 1 below.

²² OAG comments at 29.

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**Table 1
Xcel Energy Mains and Service Costs – New Construction**

Cost Type	Cost	Source
Residential or Commercial Main	2 inch - \$12.09/foot 4 inch - [PROTECTED DATA BEGINS PROTECTED DATA ENDS] /foot	Derived from actual installation cost of new construction main extensions by size, including overheads, materials, and labor. Updated in Annual Cost Inputs Filing (Docket No. G002/GR-04-1511)
Residential Service	1 inch - \$9.10/foot >1 inch - determined individually	Derived from cost of new construction service extensions, including overheads, materials, and labor. Updated in rate cases. (Docket No. G002/GR-21-678)
Commercial Service	[PROTECTED DATA BEGINS PROTECTED DATA ENDS] /foot Labor, equipment, and transportation [PROTECTED DATA BEGINS PROTECTED DATA ENDS] /foot plastic pipe material cost \$1.15/foot Gopher sleeving various - meter costs	Derived from actual installation cost of new construction service extensions, including overheads, materials, and labor. Updated in Annual Cost Inputs Filing (Docket No. G002/GR-04-1511)

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- Inclusion of metering costs: As discussed above, the Company clarifies that we include meter costs in our cost justification analysis, as noted in our revised response to Fresh Energy’s IR 2, as provide in Attachment B.
- Inclusion of ongoing customer costs: The Javelina Energy Report claimed that some Minnesota utilities do not include ongoing customer costs. The Company includes ongoing operations and maintenance (O&M) costs for the line extension project in our cost justification analysis.
- Gas usage: The Javelina Energy Report indicates that utilities appear to overestimate new customers’ initial and ongoing gas usage. As noted above, the Company’s usage estimates are based on information from the builder or developer on size of equipment, total BTU loads, size of home, number of gas appliances, and hours of operation.
- Statutory compliance costs: The Company disagrees with the Javelina Energy Report’s contention that that line extension allowances calculations should include the cost of complying with GHG emission reduction statutes. There are at present no federal or State statutes that mandate a specific reduction in GHG emission from natural gas.²³ The use of CO₂ regulatory cost values in gas integrated resource planning is intended to account for the fact that there could in the future be such regulations, but none exist today. Moreover, as discussed in Section II, alignment of the Company’s gas plans with the State’s net zero vision is being addressed comprehensively in the Company’s integrated resource planning docket, which includes consideration of GHG emission analysis, equity considerations, and the prioritization of cost-effective, low-emission resources as part of a planning process designed to determine the mix of resources that best protects customers and public interests; maintains safe, reliable, and affordable service.
- Analysis time periods: Although the Javelina Energy Report took issue with analysis of longer time periods in the line extension allowance calculation, the Company’s Residential Extension Model (REM) includes 40 years to match the asset life, per the description in our approved tariff section 6 sheet numbers 18.02 through 18.04.

²³ Some stakeholders argued that the NGIA contains such a mandate. However, while there is an NGIA plan requirement to show that an approved portfolio results in a lower throughput of natural gas, participation in the NGIA is voluntary. Accordingly, this NGIA-specific requirement does not translate into an industry-wide mandate to reduce GHG emissions from natural gas.

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- Inclusion of fixed labor costs: The Company includes fixed labor costs. Please see Attachment B for a revised response to Fresh Energy's IR 2.

In summary, the Company includes the appropriate, updated costs for mains, services, meters, O&M, and fixed labor costs in its justification analysis. Our analysis is consistent with the cost justification analyses described in our approved tariff section 6, sheets 17.1 and 18.02 through 18.04.

The Javelina Energy Report provides an analysis of Xcel Energy's line extension allocation. The Company notes the following non-exhaustive list of issues with this analysis:

- Actual main, service, and meter costs – as noted above, the main and service costs used in the Javelina Energy Report include costs for replacement projects, which is not appropriate to include for new construction. The Residential service costs include costs for all classes and not just Residential costs.
- Tax depreciation – the Javelina Energy Report includes tax depreciation rates for 15 years. Per Xcel Energy's tariff section 6 sheet 18.03, the appropriate tax schedule is the 20 Year Property modified accelerated cost recovery system (MACRS) Method.
- Return on rate base – the Javelina Energy Report includes an incorrect assumption for the pre-tax weighted cost of capital. The correct assumption is 7.16 percent, provided below in Table 2, as authorized in our most recent rate case:²⁴

²⁴ Docket No. G002/GR-23-413.

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Table 2
Weighted Average Cost of Capital

	Cost	Weight	Pre-Tax Weighted Cost	After Tax Weighted Cost
Equity	9.60%	52.50%	5.04%	5.04%
Long-term Debt	4.46%	46.87%	2.09%	1.49%
Short-term Debt	5.01%	0.63%	0.03%	0.02%
Total		100.00%	7.16%	6.55%
Income Tax Rate				28.74%

As noted in the previous section, the Company provides a typical line extension allowance calculation as Attachment A.

V. IMPACT ON LOW-INCOME CUSTOMERS

Some commenters in this docket suggest that continuation of the line extension allowance policy will increase costs, energy burden, or energy insecurity for low-income customers. We address this contention in detail below, but here present our argument in brief.

At its core, the line extension allowance policy allows a portion of the cost of providing new gas service to any customer, including low-income customers – whether that is a resident on the edge of a utility’s gas service territory seeking to switch from expensive and volatile delivered fuels to natural gas, or the future resident of a new affordable housing complex in the urban core – to be spread across all customers rather than paid for upfront by that individual low-income customer. This is in recognition that it is in the public interest to provide service to all customers.

If the line extension allowance policy is eliminated and/or free footage allowance significantly reduced, that will mean the low-income customer in this example must either remain on delivered fuels, or pay significantly more to establish gas service. This would be less of a concern if the customer had accessible and affordable access to electric heating options, but in reality they often do not. Full-electric options have high up-front costs; loan financing may be unavailable or available only at a very high interest rate; the customer may not own the home, so be unable to make home modification decisions; electrifying home heating may require home weatherization that also has a high up-front cost; and, even if the customer has a way of covering the up-front equipment costs, all-electric operating costs may be higher. These are far

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more real and immediate obstacles to affordable heating for a low-income customer than hypothetical stranded costs some decades in the future. Considering this, eliminating the line extension allowance policy could increase energy burden and exacerbate current inequities.

There are potential solutions being developed to these challenges, particularly for new construction – solutions actively being discussed in the Energy Conservation & Optimization (ECO) portfolio, NGIA plans, and likely to be discussed in the forthcoming “Stakeholder Process for Affordable and Equitable Service” in the present docket. Those dockets are the appropriate place for a holistic discussion of how to keep heating energy affordable, improve access to electrification for customers who want it, ensure gas service remains available to those who want it, and avoid stranded costs. To attempt to shortcut that holistic discussion by simply eliminating gas line extension allowances seems like an overly blunt approach, and one that is likely in the near term to increase rather than decrease energy burden and energy insecurity for low-income customers wanting natural gas service.

A. Line Extension Allowances Benefit Low-Income Customers

CenterPoint Energy comments that the current line extension allowance policy supports low-income residents of Minnesota by providing access to affordable energy,²⁵ and MERC adds that line extension provides access to an economic fuel for home heating.²⁶

The Company broadly agrees. We are committed to serving all customers with the heating fuel they choose. For some, that may be fully electric or dual fuel options for space heating, water heating and appliances, and the Company seeks to enable those choices by providing rebates and incentives for electric and dual fuel options via our ECO program and NGIA plan. Other customers will choose natural gas as a primary heating and cooking fuel. For some customers this is a matter of preference and affordability. For low-income customers, it may be especially difficult to choose electric or dual fuel heating options due to their higher upfront costs, higher operating costs, inability to take full advantage of Inflation Reduction Act (IRA) tax credits, high-cost loan financing, or other factors. In fact, some of the IRA incentives

²⁵ See CenterPoint Energy comments at 11.

²⁶ See MERC comments at 10.

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designed for low-income customers have recently become more uncertain, and the State’s IRA-funded rebate program has yet to launch.²⁷ Other customers may currently heat with propane, fuel oil, or other delivered fuels, which can have high and volatile pricing. For them natural gas may be a more affordable option, and more feasible than full electrification for the reasons mentioned above.

The line extension allowance policy in effect spreads across all customers a portion of the cost of providing gas service to new customers, including low-income customers. As we note above in Section IV.A, providing this benefit to new customers comes at an estimated cost to all of the Company’s Minnesota residential customers of approximately 1 cent a month. Eliminating or significantly curtailing this policy would mean low-income customers who wish to add gas service, and may not be able to electrify, must pay the full cost of extending lines, which would increase the cost to them of what is today the most affordable option.

MERC also notes that low-income households often face greater energy insecurity and are more vulnerable to rising energy costs, and are especially vulnerable at a time when federal funding for the Low Income Home Energy Assistance Program (LIHEAP) and other safety net programs is highly uncertain.²⁸ We agree; the increased need for assistance is illustrated in the Company’s most recent Gas Affordability Program (GAP) annual report, which shows that enrollment in that program roughly doubled from 2022 to 2024.²⁹ LIHEAP and GAP are key sources of assistance – but so is a policy that reduces the upfront costs of receiving gas service. While the Company will continue to encourage our customers to choose electric or dual fuel heating options, for those who choose gas, eliminating the line extension allowance policy would increase their costs in the short term at a time when they are already facing greater vulnerability and insecurity.

²⁷ See [Home Energy Rebates / Minnesota Department of Commerce - Energy](#).

²⁸ See MERC comments at 10.

²⁹ Northern States Power Company, doing business as Xcel Energy. March 31, 2025 ANNUAL REPORT – GAS AFFORDABILITY PROGRAM. Docket No. G002/M-25-26. See also November 21, 2024 PETITION - GAS AFFORDABILITY PROGRAM TRACKER BALANCE PROPOSAL. Docket No. G002/M-22-257.

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B. Claims that Eliminating Line Extension Allowances Would Benefit Low-Income Customers

A number of stakeholders argued that line extension policies create a risk of stranded assets which would be especially burdensome for low-income customers. The Company disagrees with the premise that line extension allowances necessarily result in stranded asset costs; this premise is based on three linked and potentially flawed assumptions, as discussed above in Section III. In any case, the forthcoming “Stakeholder Process for Affordable and Equitable Service” in the present docket will provide a holistic opportunity to discuss changes to rates needed to maintain affordable and equitable utility service – including specifically how to avoid stranded costs. A decision in this comment period to eliminate or significantly reduce line extension allowances would shortcut that more holistic discussion.

Several commenters present evidence of the greater energy burden and energy insecurity faced by many low-income, rural, and Black, Indigenous, and People of Color (BIPOC) communities in Minnesota. The Company does not dispute that evidence. We disagree, however, that eliminating the line extension allowance policy is the best way to reduce energy burden and energy insecurity. In fact, we believe eliminating line extension allowances could increase energy burden and energy insecurity in the near-term for low-income, rural, and BIPOC customers seeking new heating service. Such measures would also contravene Consensus Recommendation 15 adopted in the G21 process:

Develop policies, programs, and actions to reduce and maintain energy burden below 6 percent for all Minnesota households, to both lessen existing inequities in energy burden and ensure that the costs of the transition are not borne disproportionately by the most under-resourced Minnesotans.³⁰

Eliminating line extension allowances is inconsistent with this recommendation in the near term, since it would increase the cost to new customers who choose to be served by gas of receiving gas service – including under-resourced Minnesotans, who tend to already have high energy burden and greater barriers to purchasing and installing electric heating.

³⁰ G21 Report at 5.

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COPAL notes that:

Many low-income, rural, and BIPOC communities in Minnesota face disproportionate barriers to participating in the clean energy transition. Although the state offers rebates and incentives through programs like the Weatherization Assistance Program, Energy Assistance Program, and utility-sponsored electrification programs, access remains deeply unequal. Residents in these communities may be unable to take advantage of such programs due to: [1] income constraints and high upfront costs, [2] geographic exclusion, including limited service availability in rural or tribal areas, [3] language and digital literacy barriers [that] make applications difficult to navigate, and [4] fear or distrust of sharing personal data with government agencies.³¹

COPAL also presents evidence of high energy burdens falling “disproportionately on residents earning less than \$75,000 annually, who make up three-quarters of those struggling with energy costs and particularly on Black and Hispanic households, who report energy insecurity at rates two to three times higher than white households.”³²

We agree that low-income, rural, and BIPOC customers may face disproportionate energy burden, and may struggle to access full electrification due to the barriers COPAL identifies, and others. However, when those are new customers seeking heating service, line extension allowances significantly lower the cost to them of their cheapest option; eliminating this policy seems contrary to the goal of equitable energy service for such customers. So the question before the Commission, with respect to low-income and other disadvantaged customers, is how to ensure existing low-income customers do not face unreasonable burdens while still keeping gas service affordable for new low-income customers if that is their chosen heating option.³³ Discarding an existing tool that reduces costs to new low-income customers, rather than focusing on existing and new tools to mitigate cost increases to existing low-income customers, seems to us inadvisable.

³¹ COPAL public comment at 3.

³² COPAL public comment at 3.

³³ The OAG expressed a similar sentiment: “[T]he Commission should balance impacts to both existing low-income customers, who may be burdened by rate increases from line-extension policies that unreasonably favor new customers, and new low-income customers, who may face excessive costs to connect to the gas system if line extension allowances are eliminated.” OAG comments at 41.

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COPAL, meanwhile, proposes to “redirect subsidies toward community-based programs that offer hands-on assistance and clear, accessible paths to electrification, weatherization, customer support, and education.”³⁴ Line extension allowances, however, are not a “subsidy” that the Company can “redirect” to other programs and incentives to support electrification.

Fresh Energy adds that the Commission should prioritize “utility programs that support low-income households and communities with weatherization and beneficial electrification”³⁵ We agree with Fresh Energy on the need to provide programs and incentives to support low-income households with weatherization and electrification, and are actively providing such options through ECO and NGIA. Other partners are as well – for example, the State of Minnesota, through new tax credit and rebate programs,³⁶ and many cities, through new pilot programs for low-income weatherization and electrification.³⁷ The Company fully supports such programs, but they are incremental, currently small in scale, and will take time to scale up. They are not a justification today for eliminating a tool that reduces costs for low-income customers not yet able to access full electrification.

Finally, the OAG – in discussing how to balance impacts to existing low-income customers vs. new low-income customers – asserts that:

1. Customers building new single-family homes, and who will feel direct impact of a change in line extension policies, are likely not low-income customers.
2. Where the line and main extensions are serving new housing developments, lowering the free footage allowance would likely increase the cost for developers to build new apartments. While the costs may be passed on to homeowners or renters in these developments, the relationship of the increase is not as direct.

³⁴ COPAL public comment at 4.

³⁵ Fresh Energy comments at 19.

³⁶ [Home Energy Rebates / Minnesota Department of Commerce - Energy](#).

³⁷ *See, e.g.,* [Healthy Homes & Power of Home Saint Paul Programs | Saint Paul Minnesota](#). Healthy Homes provides pre-weatherization (health and safety) and weatherization (insulation and air-sealing) services for households with income at or below 80 percent of Area Median Income, located in a pre-approved geographic area, or enrolled in another income-qualified program. Power of Home uses franchise fees collected from Xcel Energy customers to fund electrification for households with income at or below 50 percent of State Median Income, located in pre-approved geographic area, or enrolled in another income-qualified program.

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3. The Commission should consider low-income gas customers in existing homes that may wish to connect to a gas system that is being extended. Natural gas service provides many consumer protections and more rate stability over delivered fuels like propane and fuel oil. These consumer protections will benefit new low-income customers seeking to connect to the system.³⁸

Regarding OAG's points 1 and 2, the Company questions these assertions. Neither Xcel Energy nor the OAG are housing developers, and expert input from a developer of affordable housing could be valuable here. Some developers are building single-family homes for low-income customers, and others multi-family affordable housing. If those developers face a significantly higher cost to extend gas service, and/or significantly higher cost to install all-electric heating, we assume they will pass this cost increase on, resulting in higher costs to purchase or rent the new housing.

Regarding OAG's point 3, we agree that Minnesota statute and Commission rules provide consumer protections and affordability for gas service – for example, the Company's Gas Affordability Program, which limits gas energy burden to 3 percent of household income and pays down arrears – and that similar protections do not exist for delivered fuels like propane and fuel oil. We believe this is a sound reason not to make it more difficult for low-income customers to switch from delivered fuels to natural gas by eliminating or significantly reducing gas line extension allowances.

VI. OTHER ISSUES

Stakeholders provided comments on a variety of other issues which we briefly address here.

A. Other States

A number of stakeholders urged the Commission to follow the lead of other states³⁹ which have eliminated line extension allowance policies. We do not believe this is a prudent course of action for Minnesota. As stated in our Initial Comments, other states undertaking review of and changes to their line extension allowance programs have different climates and different policy landscapes, making direct comparisons

³⁸ OAG comments at 42-43.

³⁹ California, Washington, Oregon, Colorado, Illinois, New York, Massachusetts, and Connecticut.

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problematic. Moreover, line extension policy changes are often part of a multi-year process predicated by broader policy initiatives. The Company also notes that the impacts and outcomes of line extension policy changes in other states are not yet clear, as implementation is relatively recent. As MERC noted,⁴⁰ reports or findings on the outcomes of other states' line extension policy modifications would be critical information to analyze before concluding that those paths are right for Minnesota.

B. Fairness

Some stakeholders took the position that it would be fairer for new customers to bear the cost of their line extensions because they will cause new costs,⁴¹ they should face the true costs⁴² and because they choose to connect now when there are other electrification options⁴³ (a view which the Company believes fails to take into account the realities of Minnesota's cold climate).

We, however, believe that that it is the opposite of fair to substantially disadvantage future customers by denying them a benefit that existing customers were given.⁴⁴ Moreover insisting on the protection of existing customers' interests at the expense of new customers runs contrary to the Commission's 1995 Order. As the OAG points out, per the 1995 Order, extension policies should balance "the interests of existing customers with new customers so that both groups are able to receive reasonably priced services."⁴⁵ The Company also notes that if line extension allowances are eliminated, new customers would need to pay for their own line extension costs up front, while also paying for costs for line extensions that are currently in base rates for those customers who received the line extension allowances.

C. Proposed Elimination of Contribution-in-Aid of Construction (CIAC) Caps and Waivers

The OAG recommended that utilities remove their caps on excess footage costs and that the Commission remove the discretion that utilities have to apply CIAC waivers

⁴⁰ MERC comments at 9.

⁴¹ CUB comments at 19.

⁴² Department comments at 5.

⁴³ MBDC public comment at 2.

⁴⁴ See LiUNA comments at 3-4.

⁴⁵ OAG comments at 1 (internal quotation omitted).

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based on ad hoc factors.⁴⁶ The Company is using actual costs based on previous years' costs and has not applied waivers for several years. Accordingly, the Company does not object to these recommendations.

D. Eliminating Line Extension Allowances to Encourage Electrification Measures over Gas End Uses

Several stakeholders urged elimination of line extension allowances as a strategy for encouraging full electrification instead of gas end uses. This position, however, does not account for the Minnesota climate where very cold temperatures currently require a different solution than full electrification to heat homes effectively and affordably. As provided in CEE's comments, CEE modeled and analyzed a variety of new construction home types across the state to compare the post-construction operational costs of an all-electric home compared to a standard gas appliance home and concluded:

[D]ue to higher installation costs of cold climate heat pumps with back-up electric heat compared to high-efficiency natural gas equipment, and higher operating costs in many all-electric homes, CEE is concerned that eliminating the free footage allowance in today's conditions will not meaningfully move the market toward electrification, and risks simply increasing costs to new customers without tangible benefit.⁴⁷

We note that Housing First reached a similar conclusion; "Studies show that all-electric homes in cold-climate regions like Minnesota cost significantly more to build and operate, particularly when factoring in grid infrastructure upgrades and current technological limitations."⁴⁸

In addition, as noted by MERC,⁴⁹ some of the substantial incentives and tax benefits anticipated for electrical equipment may not be forthcoming, or available but for lesser amounts than originally anticipated, due to recent changes at the federal level. This development could affect the claims made by some stakeholders about the relative affordability and anticipated increased adoption rates of electrification

⁴⁶ OAG comments at 32-35.

⁴⁷ CEE comments at 15.

⁴⁸ Housing First comments at 2.

⁴⁹ See MERC comments at 7-8.

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technologies.⁵⁰ We note that current line extension allowance policies do not prevent the Company from working with developers and builders to implement electrification options, which we will continue to do where it makes sense.

VI. STAKEHOLDER RECOMMENDATIONS AND REQUESTS

The Company agrees with those stakeholders who recommended allowing line extension allowance policies to continue, including those making this recommendation at least for the near future: the OAG, CenterPoint Energy, MERC, CEE, LiUNA, and Housing First. We disagree with those stakeholders who recommended eliminating the line extension allowance policy: the Department, CUB, Fresh Energy, MBDC, Rewiring America, ACEEE, MN350, the American Lung Association,⁵¹ and COPAL.

Some stakeholders made additional recommendations or requests which we address as follows:

A. The OAG's Recommendations

The OAG recommended that utilities periodically be required to address the following questions:⁵²

1. Whether the utility's free footage or service extension allowance included the majority of all new extensions with only the extremely long extensions requiring a CIAC.

The Company agrees with this recommendation.

⁵⁰ See, e.g., Rewiring America comments at 6: "Additionally, Minnesota's forthcoming Home Electrification and Appliance Rebate (HEAR) and Home Efficiency Rebates (HER) programs represent a major investment opportunity in energy efficiency and building electrification for Minnesota's homeowners. The implementation of these rebates - currently slated for Q4 2025 - will substantially accelerate customer adoption of high-efficiency electric technologies, particularly in space and water heating." These programs depend on funding from the Inflation Reduction Act which recently underwent a reconciliation process.

⁵¹ The American Lung Association did not explicitly call for ending line extension allowance policies, but the Company infers that the American Lung Association supports that position based on statements made in its comments. See American Lung Association comments at 3.

⁵² OAG comments at 36-37.

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2. Whether the utility's free footage or extension allowance ensures that existing customers will benefit from new customers additions to the system within a reasonable time period. Utilities should include a determination that:
 - a. The assumed revenues from the new customer include a reasonable estimate of use per customer that accounts for potential declining customer usage from energy efficiency and electrification of heating and appliances.

The Company does not agree with the recommendation. As discussed in Sections IV.A and IV.B.2, system customers begin to see a benefit in year 4 from new customers with typical line extensions. The Company believes it is a reasonable assumption that customers purchasing new construction homes will have new heating equipment which likely will maintain the same level of usage over this payback period.

- b. All costs of serving the new customer are included in the calculation.

The Company believes that we are including the costs to serve the new customer in our methodology, and therefore we agree with this recommendation.

- c. The length of the payback period and the methodology used to calculate it are reasonable.

The Company agrees that it is appropriate to perform a periodic review of whether allowances for typical extensions are providing benefit to the system.

3. If offered, whether the utility's extension charge refund policy is appropriate.

The Company does not object to this recommendation.

4. Whether the utility's extension allowance should be measured in number of feet (i.e. free footage) or be based on an estimate of the customer's estimated usage (taking into account square footage, number of gas appliances, non-gas heating equipment, etc.).

The Company does not object to this recommendation.

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5. Whether offering free footage or an extension allowance continues to be reasonable in light of current and forecasted gas-system utilization, advances in technology, state and federal policy, and risks to ratepayers of stranded assets or an overbuilt system.⁵³

The Company does not object to this recommendation.

B. CEE's Recommendations

CEE recommended that the Commission require rate-regulated natural gas utilities filing new or modified line extension tariffs to demonstrate that the proposed tariff has considered the following questions:⁵⁴

1. How does the tariff support and serve Minnesota's greenhouse gas emission reduction goals?
2. How does the tariff consider actions taken by the Commission and the Department in other proceedings, including but not limited to Gas Integrated Resource Plans, Natural Gas Innovation Act Plans, Energy Conservation and Optimization Plans, and other utility pilots, programs, and rate design offerings?
3. How does the tariff consider affordability and ratepayer protections related to both existing and new customers?
4. How does the tariff consider the differences in serving different customer types, such as whether service is being extended to new structures or existing structures without gas service?
5. How does the tariff consider the viability and affordability of alternative heating methods?

The Company supports this recommendation.

CEE also recommended that the Commission require rate-regulated gas utilities offering a free footage allowance for new Residential service to propose a comprehensive single-family new construction ECO program with the Department by

⁵³ We note that there are different definitions of "overbuilt," which could refer to the actual design/material/construction methodologies relative to a "minimum system," or to sufficient capacity through the sizing of the pipe or other methods to determine current and future capacity needs.

⁵⁴ CEE comments at 8-9.

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June 1, 2026, the filing date for the 2027–2029 ECO Triennial Plans, that includes the following components:

1. Require homes to achieve minimum energy savings of 10 percent better than Minnesota’s residential building code requirements.
 - a. Require installation of an ASHP in lieu of a central air conditioner (CAC) to be eligible for the program.
 - b. Do not require installation of natural gas appliances to be eligible for the program and do not make rebate levels contingent on installation of natural gas appliances.
 - c. Provide a bonus rebate, or rebate tiers, for homes with a UA threshold that is better than Minnesota’s residential building code requirements

The Company appreciates CEE’s recommendation regarding our future 2027-2029 ECO Triennial plan set to be filed on June 1, 2026. As indicated in CEE’s Comments, the Company’s existing Efficient New Home Construction and Affordable Efficient New Home Construction programs already have a “better than code” requirement.⁵⁵ In addition, our program provides an additional incentive to increase the efficiency of building shell improvements.

As with all of our programs, the Company reviews cost-effectiveness and market conditions as part of our planning for future triennials. We agree that dual-fuel homes should continue to be built in Minnesota. Of further consideration for new construction homes, however, is the affordability of these homes when put into market and the ability to meet a percent over code requirement as codes become more stringent in Minnesota. Simply put, it will be important for the future of our ECO programs to find ways to increase home builder participation rather than detract from that participation. The Company believes that the best way to encourage the adoption of new technologies is to avoid requiring specific ones (such as requiring the installation of a natural gas appliance). Accordingly, we do not support requiring the installation of an air source heat pump in order to receive a new construction rebate, but rather feel additional incentives and bonus opportunities for air source heat pumps better meet the objectives outlined by CEE.

⁵⁵ CEE comments at 16.

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The Company supports CEE's proposed ECO program (with the exception of a requirement to install ASHP) and believes that it could be beneficial. The Company supports a requirement that utilities *consider* adding the program CEE recommends (without requiring installation of ASHPs). The Company does not, however, agree with the recommendation to require that CEE's program be implemented in the Company's 2027-2029 ECO Triennial. There are numerous potentially beneficial programs that could be included in ECO, and a limit on available resources, so the Company believes potential options should be considered together to determine the right mix and priorities, with input from stakeholders, in that docket.

C. CUB's Request

In its comments, CUB requested that each utility file in its reply comments the following information regarding its line extension allowance policy:

1. Each utility's free-footage allowance policy.

This information was provided in our Initial Comments.⁵⁶

2. An overview of the step-by-step process used to determine required customer contribution amount, if any, when:
 - a. A customer's request for service includes an extension of service and/or main line within the free-footage allowance.
 - b. A customer's request for service includes an extension of service and/or main line that exceeds the free-footage allowance.
3. When a customer cost feasibility model is employed to determine potential CIAC costs.
4. How the utility determines the excess footage charge for customers and whether the *actual* incremental cost is calculated and charged.
 - a. If the actual incremental cost is not calculated, how are any disparities in actual construction costs recovered.
 - b. What is the actual average per-foot cost of service and main lines.
5. How the utility's free-footage allowance is determined.
6. What pay-back options, if any, the utility offers to customers required to pay a CIAC.

⁵⁶ See Company Initial Comments at 3.

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7. Any other rules or considerations relevant to the utility's LEP.

The following is a description of our process, which includes information regarding requests 2-7.

When a customer requests gas service, Company personnel perform a site visit to scope the line extension project in order to determine the measurement of main and service length as well as to determine if there any unusual construction is required. An engineering analysis is completed to determine if there is capacity available on the existing main using the line extension project details, potential customer usage, and existing system attributes.

Residential main extension requests are treated as follows:

- Extensions of less than 80 feet per home that receive natural gas service within 12 months of the start of construction are not charged for the extension. They would be charged upfront for any estimated unusual construction costs.
- Extensions of less than 80 feet per home, where home is not receiving service within 12 months are charged a refundable CIAC based on an excess footage charge for size of main installed. Currently these charges are \$12.09 per foot for 2-inch main and **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** per foot for 4-inch main, based on 2024 actual cost data in our annual cost inputs filing.⁵⁷ CIAC is refunded for customers who receive service within 5 years of the start of construction.⁵⁸
- Extensions of more than 80 feet per home but less than 4,000 feet from existing Company infrastructure require a REM analysis.
- Extensions of 4,000 feet or more are at Company discretion, and would require a REM analysis.

Residential service extension requests are treated as follows:

- Extensions of up to 75 feet are not charged for the extension. They would be charged upfront for any estimated unusual construction costs.

⁵⁷ Docket No. G002/GR-04-1511.

⁵⁸ The Company's tariff section 6 sheet 18 states that the charge is \$5 per foot, but also states that the price per foot will be determined each year in March. Our filing in G002/GR-04-1511 show the price per foot by size of main. This is the cost we charge customers and accordingly is reflected in the text above.

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- Extensions of more than 75 feet are assessed an excess footage charge. Currently these charges are \$9.10 per foot based on actual costs as authorized in the most recent rate case. This cost is defined on tariff section 6 sheet 18.2.
- Excess footage charges for gas are waived if gas and electric service extension are installed jointly.

Commercial gas service extensions are cost justified based on the formula for maximum expenditures as noted on tariff section 6 sheet 17.1. Costs for the extension are calculated using actual average costs from the prior year for mains, services, meters, and regulators. These costs are filed with the Commission in our annual cost input filing.⁵⁹

As noted above, estimates for Residential and Commercial line extensions are created based on average costs from the prior year or the most recently approved tariff sheets. Differences between actual costs and estimated costs are not trued-up and are therefore incorporated into the Company's next rate case.

The Company's Residential line extension allowance of 80 feet of main was set and the 75 feet of service was affirmed in the Company's 2022 test year rate case in Docket No. G002/GR-21-678. Please see Attachments A and B for analyses that show that these allowances are justified by the estimated revenue from the customer.

Commercial customers are required to pay any cost of unusual construction or required excess footage. Our tariff provides the option to pay for additional installation costs through a one-time payment, a special monthly charge, and/or an annual minimum charge.

D. LiUNA's Recommendation

LiUNA recommended that the threshold for approval of line extensions be changed from current requirement that each line extension must be at least cost-neutral to customers to a requirement that a utility's overall extension program be cost-neutral, given the substantial public benefits associated with extension of service.⁶⁰

⁵⁹ Docket No. G002/GR-04-1511.

⁶⁰ LiUNA comments at 4.

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The Company is interested in LiUNA's recommendation but would like to understand better what would be required to demonstrate that the overall program is cost-neutral.

CONCLUSION

The Company thanks the Commission for this opportunity to submit Reply Comments on the issue of modifying existing gas line extension policies for rate regulated gas utilities. Consistent with our position in our Initial Comments, the Company does not believe that changes are advisable at this time.

Dated: August 8, 2025

Northern States Power Company

Typical Line Extension Allowance

	footage	rate	cost
2 inch Main	80	\$12.09	\$967
Project contingency - Main		5%	\$48
Service	75	\$9.10	\$683
Meter/regulator/labor/materials/etc.			\$815
<u>Project contingency - Service</u>		<u>5%</u>	<u>\$75</u>
Total Capital Investment			\$2,587

Final Authorized			
Docket No G002/GR-23-413			
	Cost	Weight	Pre-Tax Wtd. Cost
Equity	9.60%	52.50%	5.0400%
LTD	4.46%	46.87%	2.0900%
STD	5.01%	0.63%	0.0320%
		100.00%	7.1600%
Income Tax Rate		28.74%	

Time Period	Year	Plant				Equity Return	Debt Return	Book Dep'n	Tax Dep'n	Deferred Taxes	Salvage
		Service Additions	Customer Surcharge Billings	Total Capital Investment	Net EOY Investment Rate Base						
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
0	2025	2,513	0	2,513	2,472	62	26	19	94	21	0
1	2026	75	0	75	2,438	124	52	78	184	30	0
2	2027	0	0	0	2,331	120	51	80	173	27	0
3	2028	0	0	0	2,228	115	48	80	160	23	0
4	2029	0	0	0	2,129	110	46	80	148	20	0
5	2030	0	0	0	2,033	105	44	80	137	16	0
6	2031	0	0	0	1,939	100	42	80	127	14	0
7	2032	0	0	0	1,849	95	40	80	117	11	0
8	2033	0	0	0	1,759	91	38	80	115	10	0
9	2034	0	0	0	1,669	86	36	80	115	10	0
10	2035	0	0	0	1,579	82	34	80	115	10	0
11	2036	0	0	0	1,489	77	33	80	115	10	0
12	2037	0	0	0	1,399	73	31	80	115	10	0
13	2038	0	0	0	1,309	68	29	80	115	10	0
14	2039	0	0	0	1,219	64	27	80	115	10	0
15	2040	0	0	0	1,129	59	25	80	115	10	0
16	2041	0	0	0	1,039	55	23	80	115	10	0
17	2042	0	0	0	949	50	21	80	116	10	0
18	2043	0	0	0	859	46	19	80	115	10	0
19	2044	0	0	0	769	41	17	80	116	10	0
20	2045	0	0	0	695	37	16	80	59	(6)	0
21	2046	0	0	0	638	34	14	80	2	(22)	0
22	2047	0	0	0	581	31	13	80	0	(23)	0
23	2048	0	0	0	524	28	12	80	0	(23)	0
24	2049	0	0	0	468	25	11	80	0	(23)	0
25	2050	0	0	0	411	22	9	80	0	(23)	0
26	2051	0	0	0	354	19	8	80	0	(23)	0
27	2052	0	0	0	297	16	7	80	0	(23)	0
28	2053	0	0	0	240	14	6	80	0	(23)	0
29	2054	0	0	0	183	11	4	80	0	(23)	0
30	2055	0	0	0	127	8	3	80	0	(23)	0
31	2056	0	0	0	70	5	2	80	0	(23)	0
32	2057	0	0	0	13	2	1	80	0	(23)	0
33	2058	0	0	0	(44)	(1)	(0)	80	0	(23)	0
34	2059	0	0	0	(101)	(4)	(2)	80	0	(23)	0
35	2060	0	0	0	(157)	(7)	(3)	80	0	(23)	0
36	2061	0	0	0	(214)	(9)	(4)	80	0	(23)	0
37	2062	0	0	0	(271)	(12)	(5)	80	0	(23)	0
38	2063	0	0	0	(328)	(15)	(6)	80	0	(23)	0
39	2064	0	0	0	(385)	(18)	(8)	80	0	(23)	0
40	2065	0	0	0	1	(10)	(4)	60	0	156	(601)
Project Totals		2,587	0	2,587				3,189	2,587	0	(601)

Typical Line Extension Allowance

<u>Time Period</u>	<u>Year</u>	<u>Income Taxes</u>	<u>Property Taxes</u>	<u>Operating Expenses</u>	<u>Total Rev Req</u>	<u>Retail Revenues</u>	<u>Revenue Deficiency (Excess)</u>	Cumulative	
								<u>Deficiency or (Excess)</u>	<u>Present Value of Revenue Deficiency or (Excess)</u>
(1)	(2)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
0	2025	(4)	53	69	248	(232)	16	16	16
1	2026	5	55	69	414	(398)	16	15	30
2	2027	8	55	69	409	(398)	12	10	41
3	2028	10	55	69	400	(398)	2	2	42
4	2029	12	55	69	391	(398)	(6)	(5)	38
5	2030	14	55	69	383	(398)	(15)	(10)	27
6	2031	15	55	70	375	(398)	(23)	(15)	12
7	2032	17	55	70	367	(398)	(30)	(19)	(7)
8	2033	16	55	70	359	(398)	(38)	(22)	(29)
9	2034	15	55	70	352	(398)	(46)	(25)	(53)
10	2035	13	55	70	344	(398)	(54)	(27)	(80)
11	2036	12	55	70	336	(398)	(61)	(29)	(109)
12	2037	11	55	70	329	(398)	(69)	(30)	(139)
13	2038	9	55	70	321	(398)	(77)	(31)	(170)
14	2039	8	55	70	313	(398)	(85)	(32)	(203)
15	2040	7	55	70	306	(398)	(92)	(33)	(235)
16	2041	5	55	70	298	(398)	(100)	(33)	(268)
17	2042	4	55	70	290	(398)	(107)	(33)	(301)
18	2043	3	55	71	283	(398)	(115)	(33)	(334)
19	2044	1	55	71	275	(398)	(123)	(33)	(368)
20	2045	16	55	71	268	(398)	(130)	(33)	(400)
21	2046	32	55	71	262	(398)	(135)	(32)	(432)
22	2047	32	55	71	258	(398)	(140)	(31)	(462)
23	2048	31	55	71	253	(398)	(145)	(29)	(492)
24	2049	30	55	71	248	(398)	(150)	(28)	(520)
25	2050	29	55	71	243	(398)	(155)	(27)	(548)
26	2051	28	55	71	238	(398)	(160)	(26)	(574)
27	2052	28	55	72	234	(398)	(163)	(25)	(600)
28	2053	27	55	72	229	(398)	(168)	(24)	(624)
29	2054	26	55	72	224	(398)	(173)	(23)	(647)
30	2055	25	55	72	219	(398)	(178)	(22)	(670)
31	2056	24	55	72	215	(398)	(183)	(21)	(691)
32	2057	24	55	72	211	(398)	(187)	(20)	(711)
33	2058	23	55	72	206	(398)	(192)	(20)	(731)
34	2059	22	55	73	201	(398)	(197)	(19)	(750)
35	2060	21	55	73	196	(398)	(202)	(18)	(768)
36	2061	20	55	73	191	(398)	(207)	(17)	(785)
37	2062	19	55	73	186	(398)	(212)	(16)	(801)
38	2063	19	55	73	182	(398)	(216)	(16)	(817)
39	2064	18	55	73	177	(398)	(220)	(15)	(832)
40	2065	(158)	55	74	172	(398)	(225)	(14)	(846)
Project Totals			2,237	2,909	11,407	(16,142)	(4,735)	(846)	

- Not-Public Document – Not For Public Disclosure**
 Public Document – Not-Public Data Has Been Excised
 Public Document

Xcel Energy Information Request No. 2
Docket No.: G999/CI-21-565 **SECOND REVISED**
Response To: Clean Energy Organizations
Requestor: Amelia Vohs
Date Received: May 12, 2025

Question:

In a live excel spreadsheet with all formulae and links intact, provide the Company's most recent calculation(s) used to justify its residential free footage allowances. Provide all supporting workpapers underlying the calculation(s).

Response:

Please see Attachments A and B to this response. Attachments A and B are marked "Not-Public" in entirety as they contain information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). The information is Trade Secret Information because it derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use. Pursuant to Minn. Rule 7829.0500, subp. 3, the Company provides the following description of the excised material:

1. **Nature of the Material:** Residential Free Footage Allotment
2. **Author(s):** Gas Business Development
3. **Importance:** Contains not-public, proprietary information
4. **Date the Information was Prepared:** May 2025

REVISED

The Company's original response designated Attachments A and B to this response as Not Public. Attachments A and B are being resubmitted as Public documents.

SECOND REVISED

The Company provides second revised Attachments A and B, which includes the following updates:

- Distribution Charge per therm rate updated to tariffed rate effective June 1, 2025

- Addition of allowance cost for labor and materials to tie into the main, plus costs for the riser, regulator, and meter set. These costs were unintentionally omitted in our prior responses.

Preparer:	Gerold Traut	
Title:	Manager Gas Business Deve	
Department:	NSPM Gas Business Deve	
Telephone:	218-825-2305	REVISED June 27, 2025
Date:	May 22, 2025	SECOND REVISED August 8, 2025

Current Residential Free Footage Allotment for Gas Main Extensions
80 Feet Per Home

Cost:	80 ft of main
	<u>\$12.09 per foot Main Gas Plastic <=2"</u>
	\$967.20

Current Revenue:	\$ 9.00	Customer Charge/mo.
		12 Months
	\$ 108.00	Customer Charge/year
	\$ 0.380239	Distribution Charge/Therm
	840.56	average Therm usage/year
		Annual Res DKT sales/Res Cust
	<u>\$ 319.61</u>	average Distribution Charge revenue
	\$ 427.61	average annual revenue

	0.14398	LARR Factor
\$	2,969.95	average Justifiable Expense
\$	2,002.75	Available for service justification

	\$967.20	Main Cost
	<u>\$1,497.00</u>	Service Cost
	\$2,464.20	Main-Service cost

\$	2,969.95	Avg Justifiable Expense
\$	505.75	Justification sufficiency

Current Residential Free Footage Allotment for Gas Service Extensions
75 Feet Per Home

Cost:	\$9.10	Incremental Cost Per Foot
	75	allowance feet per home for service line extensions
	<u>\$ 682.50</u>	Allowance cost for 75' based on incremental cost per foot
	<u>\$814.50</u>	Allowance cost for Labor and materials to tie into main plus riser, regulator, meter set
	<u>\$1,497.00</u>	Total service Cost
Revenue:	\$ 9.00	Customer Charge/mo.
		12 Months
	\$ 108.00	Customer Charge/year
	\$ 0.380239	Distribution Charge/Therm
	840.56	average Therm usage/year
	\$ 319.61	average Distribution Charge revenue
	\$ 427.61	average annual revenue
	0.14398	LARR Factor
	\$ 2,969.95	average Justifiable Expense
	\$ 1,472.95	Available for main justification

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. G999/CI-21-565

Dated this 8th day of August 2025

/s/

Christine Schwartz
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	21-565Official Service List
2	Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource		15669 WATERLOO CIR TRUCKEE CA, 96161 United States	Electronic Service		No	21-565Official Service List
3	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	21-565Official Service List
4	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
5	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	21-565Official Service List
6	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
7	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	21-565Official Service List
8	Randall	Beck	rbeck3@wm.com	Waste Management Renewable Energy, L.L.C.		1021 Main St Houston TX, 77002 United States	Electronic Service		No	21-565Official Service List
9	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	21-565Official Service List
10	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	21-565Official Service List
11	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
12	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
13	Tim	Brinkman	tim.brinkman@gvtel.com	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	21-565Official Service List
14	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21-565Official Service List
15	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN,	Electronic Service		Yes	21-565Official Service List

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16	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	21-565Official Service List
17	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
18	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	21-565Official Service List
19	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
20	Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org			Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
21	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
22	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	21-565Official Service List
23	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	21-565Official Service List
24	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	21-565Official Service List
25	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	21-565Official Service List
26	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
27	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	21-565Official Service List
28	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
29	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis	Electronic Service		No	21-565Official Service List

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						MN, 55401 United States				Service List
30	Tom	Dicklich	tdicklich@mntrades.org	Minnesota Building & Construction Trades Council		353 W. 7th St Rm 105 Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
31	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
32	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
33	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	21-565Official Service List
34	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	21-565Official Service List
35	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	21-565Official Service List
36	Mark	Foster	mark@housingfirstmn.org	Housing First Minnesota		2960 Centre Pointe Drive Roseville MN, 55113 United States	Electronic Service		No	21-565Official Service List
37	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	21-565Official Service List
38	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	21-565Official Service List
39	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
40	Debbie	Goettel	debbie.goettel@hennepin.us	Partnership on Waste and Energy		2785 White Bear Ave N Ste 350 Maplewood MN, 55109 United States	Electronic Service		No	21-565Official Service List
41	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	21-565Official Service List
42	Laura	Haight	lhaight@pfpi.net	Partnership for Policy Integrity		POB 2513 Amherst MA, 01004 United States	Electronic Service		No	21-565Official Service List
43	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55415 United States				
44	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	21-565Official Service List
45	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	21-565Official Service List
46	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St. Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
47	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	21-565Official Service List
48	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
49	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-565Official Service List
50	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
51	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21-565Official Service List
52	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
53	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
54	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	21-565Official Service List
55	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	21-565Official Service List
56	D	Kalmon	dkalmon@mwwmo.org	Mississippi Watershed Management Organization		2522 Marshall St NE Minneapolis MN, 55418-3329 United States	Electronic Service		No	21-565Official Service List
57	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL,	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						60603 United States				
58	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21- 565Official Service List
59	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	21- 565Official Service List
60	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	21- 565Official Service List
61	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21- 565Official Service List
62	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	21- 565Official Service List
63	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21- 565Official Service List
64	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	21- 565Official Service List
65	Robert	Lems	administration@dm-t-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	21- 565Official Service List
66	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	21- 565Official Service List
67	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	21- 565Official Service List
68	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401- 1993 United States	Electronic Service		No	21- 565Official Service List
69	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21- 565Official Service List
70	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21- 565Official Service List
71	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400	Electronic Service		No	21- 565Official

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72	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	21-565Official Service List
73	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
74	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	21-565Official Service List
75	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	21-565Official Service List
76	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-565Official Service List
77	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	21-565Official Service List
78	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	21-565Official Service List
79	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-565Official Service List
80	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
81	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
82	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
83	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
84	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
85	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light		200 1st Street SE PO Box	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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87	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	21-565Official Service List
88	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
89	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
90	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	21-565Official Service List
91	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	21-565Official Service List
92	Bret	Pence	bretpence@mnipl.org	Minnesota Interfaith Power and Light		106 Waverly Place Duluth MN, 55803 United States	Electronic Service		No	21-565Official Service List
93	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List
94	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	21-565Official Service List
95	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	21-565Official Service List
96	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	21-565Official Service List
97	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	21-565Official Service List
98	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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100	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	21-565Official Service List
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115	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
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