

**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Joseph Sullivan	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions

DOCKET NO. G-008/M-21-138

In the Matter of the Petition by Great Plains Natural Gas Co. for Approval of Rule Variances to Recover High Natural Gas Costs from February 2021

DOCKET NO. G-004/M-21-235

In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy to Recover February 2021 Natural Gas Costs

DOCKET NO. G-002/CI-21-610

**OFFICE OF THE ATTORNEY
GENERAL’S ANSWER TO UTILITIES’
PETITION FOR RECONSIDERATION**

INTRODUCTION

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits the following Comments in response to the Petitions for Reconsideration by CenterPoint Energy (“CenterPoint”),¹ Northern States Power Company (“Xcel”),² and Great Plains Natural Gas Company (“Great Plains”)³ (collectively “Utilities”) in the above-entitled matters.⁴ The

¹ CenterPoint Energy Petition for Reconsideration [hereinafter “CenterPoint Petition”].

² Northern States Power Company Petition for Reconsideration, Rehearing and Clarification [hereinafter “Xcel Petition”].

³ Request for Reconsideration of Great Plains Natural Gas Co. [hereinafter “Great Plains Petition”].

⁴ The CenterPoint Petition, Xcel Petition, and Great Plains Petition will be referred to collectively as the “Petitions.”

Petitions seek to impose tens of millions of dollars of costs on captive ratepayers, despite the fact that the Utilities incurred those costs unnecessarily as a result of their unreasonable and imprudent conduct. With the benefit of a robust record, the Public Utilities Commission (“Commission”) correctly relieved ratepayers of the financial consequences of the Utilities’ unreasonable and imprudent conduct. The Petitions do not establish any justification for the Commission to depart from its thorough and well-reasoned orders. The Commission should decline the Utilities’ invitations to make ratepayers pay for the Utilities’ mistakes, and instead deny the Petitions.

BACKGROUND

During a period of cold weather in February, 2021, the spot price for natural gas spiked to abnormally high levels (“February Event”).⁵ Even after setting aside increases up to \$20 per dekatherm as “normal” fluctuations, the Utilities collectively incurred hundreds of millions of dollars of extra costs for natural gas. Specifically, CenterPoint incurred \$409 million, Xcel incurred \$179 million, and Great Plains incurred \$9 million (collectively, “Extraordinary Costs”).⁶ Some of these costs were avoidable. After a robust notice and comment process, an extensive contested case proceeding, detailed briefing, and multiple lengthy hearings, the Commission concluded that many of these costs did not need to be incurred, and thus should not be pushed onto ratepayers. Specifically, CenterPoint unnecessarily incurred \$16.0 million by acting unreasonably and imprudently with respect to its storage facilities, \$12.4 million by unreasonably and imprudently failing to deploy its peaking facilities, and \$7.3 million by unreasonably and imprudently failing to curtail its interruptible customers.⁷ Xcel unnecessarily incurred \$14.7

⁵ Ex. 802 at 20 (Cebulko Direct).

⁶ ORDER GRANTING VARIANCES AND AUTHORIZING MODIFIED COST RECOVERY SUBJECT TO PRUDENCE REVIEW, AND NOTICE OF AND ORDER FOR HEARING at 11 (Aug. 30, 2021).

⁷ *In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*, Docket No. G-008/M-21-138, ORDER DISALLOWING RECOVERY OF CERTAIN NATURAL GAS COSTS AND REQUIRING FURTHER ACTION (Oct. 19, 2022) [hereinafter “CenterPoint Order”].

million by unreasonably and imprudently maintaining its peaking plants and \$4.4 million by acting unreasonably and imprudently with respect to its load forecasting.⁸ Great Plains unnecessarily incurred \$0.4 million by unreasonably and imprudently failing to deploy its storage resources and \$0.4 million by unreasonably and imprudently failing to curtail its interruptible customers.⁹ All told, the Utilities recovered approximately 90 percent of the Extraordinary Costs.

LEGAL STANDARD

Minnesota law instructs that, in response to a petition for rehearing, the Commission may “grant or hold a rehearing . . . if in its judgment sufficient reason therefor exists.”¹⁰ In prior cases, the Commission has declined to reopen matters where the petition “does not raise new issues, does not point to new and relevant evidence, does not expose errors or ambiguities in the [order], and does not otherwise persuade the Commission that it should rethink the decisions set forth in its Order.”¹¹ In the event that the Commission does grant a rehearing, Minnesota law permits the Commission to revisit its decision when it appears that the original decision was “unlawful or unreasonable.”¹²

The Utilities have not raised any new issues or pointed to any new or relevant evidence in these dockets. Furthermore, the Commission (1) applied the correct legal standards, (2) made determinations supported by evidence, and (3) correctly interpreted CenterPoint and Great Plains’ interruptible tariffs. Accordingly, the Commission should deny the Petitions.

⁸ *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy to Recover February 2021 Natural Gas Costs*, Docket No. G-002/M-21-610, ORDER DISALLOWING RECOVERY OF CERTAIN NATURAL GAS COSTS AND REQUIRING FURTHER ACTION (Oct. 19, 2022) [hereinafter “Xcel Order”].

⁹ *In the Matter of the Petition by Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities Co., for Approval of Rule Variances to Recover High Natural Gas Costs from February 2021*, G-004/M-21-235, ORDER DISALLOWING RECOVERY OF CERTAIN NATURAL GAS COSTS AND REQUIRING FURTHER ACTION (Oct. 19, 2022) [hereinafter “Great Plains Order”].

¹⁰ Minn. Stat. § 216B.27, subd. 1.

¹¹ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-002/GR-13-868, ORDER DENYING RECONSIDERATION at 1 (Oct. 16, 2015).

¹² Minn. Stat. § 216B.27, subd. 3.

ANALYSIS

Reconsidering the Commission's Orders would inappropriately burden ratepayers with tens of millions of dollars of costs that the Utilities incurred as a result of their unreasonable and imprudent decisions. Such an outcome would be unjust, not in the public interest, and contrary to Minnesota law. The Commission's Orders are thoughtful and well-reasoned. Those Orders apply the correct legal standards and, contrary to the Utilities' arguments, do not rely on hindsight or fail to consider a possible range of reasonable conduct. The Commission's determinations are all supported by credible and substantial evidence in the record. The Orders also correctly interpret CenterPoint and Great Plains' interruptible tariffs. Accordingly, the Commission should deny the Petitions for Reconsideration and affirm its Orders.

I. THE COMMISSION APPLIED THE CORRECT LEGAL STANDARDS.

In ordering appropriate disallowances, the Commission applied the correct legal standards. The Utilities' arguments that the Commission impermissibly relied on hindsight and did not consider the possibility of a range of reasonable conduct are contradicted by the Orders. Thus, the Commission should not credit these arguments and instead it should deny the Petitions.

A. The Orders Do Not Rely on Hindsight.

The Utilities argue that the Orders impermissibly rely on hindsight.¹³ This is simply untrue. The Orders explicitly acknowledge that prudence is not evaluated on the basis of hindsight.¹⁴ In addition to accurately articulating that prudence is not evaluated on the basis of hindsight, the Commission's analysis demonstrates that its decisions were not based on hindsight. For example, the Commission explicitly based its disallowance for CenterPoint's failure to preserve Ventura swing supply after February 16, 2021, on information available to the utility *before* 8:00 a.m. on

¹³ CenterPoint Petition at 4; Great Plains Petition at 2.

¹⁴ CenterPoint Order at 5; Xcel Order at 5; Great Plains Order at 5.

February 12, 2021.¹⁵ Similarly, the Commission found that, for Xcel, by the morning of February 16, 2021 “circumstances demanding extraordinary action were known and unequivocal,”¹⁶ and that, for Great Plains, it was unreasonable to assume that gas prices would moderate based on knowledge as of the morning of February 16, 2021.¹⁷ Far from being based on hindsight, the Commission’s analysis explicitly considered what the Utilities knew or should have known at the time of their decisions, and there is no basis to ask the Commission to reconsider its Orders.

B. The Commission Appropriately Considered a Range of Reasonable Utility Conduct.

CenterPoint argues that the Commission failed to consider that a range of possible conduct could be found to be reasonable.¹⁸ These allegations are also unfounded. The Commission’s analysis clearly evaluated whether CenterPoint’s actions fell within a range of reasonable conduct. This is true both for issues where the Commission concluded that CenterPoint acted reasonably, and for issues where the Commission concluded that CenterPoint acted unreasonably. For example, the Commission determined that “CenterPoint’s decision not to maximize Ventura swing volumes for February 14 fell *within the range* of acceptable conduct”¹⁹ and that CenterPoint’s “financial hedging strategy leading up to the event was *within the range* of prudent conduct.”²⁰ Conversely, where the Commission found that CenterPoint acted unreasonably, it concluded that CenterPoint’s “decision not to plan for curtailment at that level was *outside the range* of prudent conduct”²¹ and “that CenterPoint’s decision to reserve its peaking plants to address potential

¹⁵ CenterPoint Order at 14.

¹⁶ Xcel Order at 37.

¹⁷ Great Plains Order at 16.

¹⁸ CenterPoint Petition at 5–6.

¹⁹ CenterPoint Order at 14 (emphasis added).

²⁰ *Id.* at 28 (emphasis added).

²¹ *Id.* at 25 (emphasis added).

reliability issues on February 13–16 fell *outside of the wide range of reasonable conduct.*”²² Given the Commission’s explicit consideration of a range of possible reasonable utility conduct, it is unclear in what respect CenterPoint believes the Commission did not consider a range of reasonable conduct. The Commission clearly considered such a range, and CenterPoint has failed to establish that the Commission should reconsider its Orders.

II. THE COMMISSION’S ORDERS ARE SUPPORTED BY SUBSTANTIAL EVIDENCE IN THE RECORD.

The Utilities conclude that the Commission’s Orders were not supported by substantial evidence in the record.²³ These allegations are unfounded. The Commission’s thorough and well-reasoned Orders chronicle in extensive detail the evidence upon which it based its disallowances. For example, when considering CenterPoint’s Waterville/Medford storage facility, the Commission evaluated both the possibility of withdrawing additional gas, and the availability of other resources to preserve system reliability even if extra gas was not available from that facility.²⁴ The Commission also extensively analyzed how Xcel could have avoided substantial costs by deploying its peaking plants (had they been available) and how Xcel could have appropriately balanced cost and reliability concerns in doing so.²⁵ Furthermore, the Commission explained in detail how it determined that a two percent supply reserve margin was the appropriate basis for calculating a disallowance for Great Plains’ unreasonable and imprudent failure to utilize its storage.²⁶ The other disallowances in these matters were supported by similarly robust consideration of the record and relevant evidence.

²² *Id.* at 19 (emphasis added).

²³ CenterPoint Petition at 3; Xcel Petition at 15–16; Great Plains Petition at 2.

²⁴ CenterPoint Order at 10.

²⁵ Xcel Order at 37–38.

²⁶ Great Plains Order at 16–17.

One aspect of Xcel's critique of the adequacy of the evidence supporting disallowances bears additional reply. Xcel faults the Commission for relying on the analysis of a consultant hired by the Department.²⁷ Xcel points out that the Department witness' experience comes from work with a consulting firm and criticizes his lack of experience purchasing gas and his lack of prior testimony on natural gas issues, while touting the experience of its own witnesses.²⁸ These arguments ignore the Department witness's impressive credentials and experience. The Department witness has worked for a national energy consulting firm for more than a decade and has provided analysis on a wide variety of utility issues.²⁹

In prudence reviews, it is almost always the case that intervenors will not have the financial resources to employ as many experts with such narrow specializations as utilities are able to. Xcel's argument is basically that the Commission should disregard intervenor testimony if it comes from witnesses who do not have experience on a utility's payroll or have not previously testified on the same precise issue in the past. If accepted, this argument would spell the end of effective prudence review in Minnesota. Intervenors will almost always need to employ internal or external experts who will analyze a broader range of issues than the utilities' specialists, and these experts will sometimes need to research and analyze an issue upon which they have never provided testimony. Indeed, if having previously testified on the same topic was a prerequisite to testifying on that issue, then no one could ever testify because every witness will have a first time testifying on any given issue. Xcel's unwarranted attack on the Department witness' experience is a red herring designed to distract from the substantial evidence supporting the disallowances. As the

²⁷ Xcel Petition at 8.

²⁸ *Id.* at 8.

²⁹ Ex. 506 at 1–2 and Schedule MJK-D-1 (King Direct).

Commission did in its Orders, it should continue to consider the substance of the parties' arguments and deny the Petitions.

III. CENTERPOINT AND GREAT PLAINS' TARIFFS ALLOW FOR ECONOMIC CURTAILMENT.

CenterPoint and Great Plains both invoke their tariffs in asking the Commission to reconsider disallowances for failing to curtail interruptible customers.³⁰ As the interruptible tariffs do allow for economic curtailment, the Commission should deny the Petitions.

CenterPoint argues that its tariff “lacks any criteria such as a threshold gas price that would trigger price-based curtailment.”³¹ This argument ignores the fact that its tariff also does not provide this type of specific criteria for reliability curtailments. Indeed, the tariff does not even define “reliability.”³² Far from narrowly restricting CenterPoint’s discretion to economically curtail, the tariff broadly authorizes CenterPoint to curtail for “other appropriate reasons.”³³ Surely, protecting customers from the economic consequences of a historic price spike would be an “appropriate” reason.

Great Plains argues that it is “clear” that its tariff does not allow for economic curtailment³⁴ and that it was “not reasonable” to interpret its tariff to the contrary.³⁵ This claim of clarity is undermined by Great Plains’ *own interpretation* of its tariff. Great Plains’ tariff allows for curtailments for “operational reasons,” and during the February Event, a Great Plains employee stated, “[t]here could be an argument made that ‘operational reasons’ is gas prices and it would be harmful to all customers and that is why we have requested curtailments. . . . [W]e can make the case if curtailments is your intended route.”³⁶ Great Plains’ position that its tariff does not allow

³⁰ CenterPoint Petition at 23; Great Plains Petition at 2–6.

³¹ CenterPoint Petition at 23.

³² Ex. 819 at 37 (Nelson Surrebuttal).

³³ Department Reply Br. at 12 (internal citations omitted).

³⁴ Great Plains Petition at 6.

³⁵ *Id.* at 3.

³⁶ Ex. 300 at 8–10 (Jacobson Direct).

for economic curtailment is a *post hoc* rationalization that is contradicted by its own employees' understanding of the tariff at the time the decision not to curtail was made.

As CenterPoint and Great Plains' tariffs do allow for economic curtailment, the Commission should deny the Petitions.

CONCLUSION

The Commission's Orders apply the correct legal standards, are supported by substantial record evidence, and accurately interpret interruptible tariffs. For the foregoing reasons, the Commission should affirm its decisions and deny the Petitions.

Dated: November 18, 2022

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

/s/ **Joseph C. Meyer**

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November 18, 2022

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

Re: *In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*
MPUC Docket No. G-008/M-21-138

In the Matter of the Petition by Great Plains Natural Gas Co. for Approval of Rule Variances to Recover High Natural Gas Costs from February 2021
MPUC Docket No. G-004/M-21-235

In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy to Recover February 2021 Natural Gas Costs
MPUC Docket No. G-002/CI-21-610

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matters please find the Office of the Attorney General's Answer to Utilities' Petition for Reconsideration.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ **Joseph C. Meyer**

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CERTIFICATE OF SERVICE

Re: *In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions*
MPUC Docket No. G-008/M-21-138

In the Matter of the Petition by Great Plains Natural Gas Co. for Approval of Rule Variances to Recover High Natural Gas Costs from February 2021
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In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy to Recover February 2021 Natural Gas Costs
MPUC Docket No. G-002/CI-21-610

I, JUDY SIGAL, hereby certify that on the 18th day of November, 2022, I e-filed with eDockets the *Office of the Attorney General's Answer to Utilities' Petition for Reconsideration*, and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal
JUDY SIGAL

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