

December 2, 2024

PUBLIC DOCUMENT

Will Seuffert
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **PUBLIC** Comments of the Minnesota Department of Commerce
Docket Nos. G999/CI-21-135 and G002/CI-21-610

Dear Mr. Seuffert:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce (Department) in the following matter:

In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers

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

The annual compliance filing for 2024 was filed by Xcel Energy on August 1, 2024.

The Department recommends the Minnesota Public Utilities Commission **accept and approve** Xcel Energy's 2024 annual compliance filing and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Peter Wyckoff, Ph.D.
Deputy Commissioner, Division of Energy Resources

JK/ar
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket Nos. G999/CI-21-135 and G002/CI-21-610

I. INTRODUCTION

The Minnesota Department of Commerce, Energy Division (Department) appreciates the opportunity to provide comments on Xcel Energy's (Xcel, XE, the Company) annual compliance filing submitted August 1, 2024, for these two dockets. These two dockets can be thought of as two aspects of the Commission's response to the costs associated with the February 2021 Pricing Event (PE). Docket no. G002/CI-21-610 focused primarily on the recovery of the costs resulting from the February 2021 Pricing Event. Docket no. G999/CI-21-135 was more concerned with Xcel's efforts to improve its ability to mitigate the risk of price spikes on a forward-looking basis.¹

Xcel's 2024 annual compliance filing (ACF) introduced a new twist into the 2024 ACF. Natural gas wholesale prices spiked on January 13th through the 16th 2024 (January 2024 Pricing Event). The Company estimated its weighted average cost of gas (WACOG) to be \$3.15/Dth in its January 2024 Purchase Gas Adjustment (PGA) filing. Xcel paid on average \$25.57/Dth for daily gas between January 13th and 16th.² That average higher cost of gas was 8.1 times higher than the Company's monthly PGA estimate. This event triggered a reporting requirement that was included in the Commission's February 17th, 2023, Order.³ Xcel made that filing on January 26, 2024.

The Commission identified several reporting requirements to be included in each ACF. For clarity, the Department separated those reporting requirements two timeframes, short-term (up to 5 years) and long-term (beyond 5 years). The Department then further divided those reporting requirements into those related to the supply and those related to the demand of natural gas respectively for the different time periods.

The short-term supply related reporting requirements are primarily focused on the review of operational changes to the gas supply function that could provide ratepayers with better protection

¹ The Commission requirement for annual compliance filings for these two dockets was included in its ORDER REQUIRING ACTIONS TO MITIGATE IMPACTS FROM FUTURE NATURAL GAS PRICES SPIKE, SETTING FILING REQUIREMENTS AND INITIATING A PROCEEDING TO ESTABLISH GAS RESOURCE PLANNING REQUIREMENTS, issued February 17, 2023, at Order pt. 15 (February 17th Order).

² Compliance filing, January 26, 2024, at p 2.

³ Ibid at Order Pt. 3. If a gas utility in this docket pays prices on the daily spot market that exceed five times the average price of gas in the utility's filed purchased-gas adjustment for the current month when the gas was purchased, the utility shall make a filing to the Commission within 14 days identifying: A. Its costs for procuring gas for Minnesota customers while gas prices were inflated above this amount, B. What actions the utility took to account for or mitigate those costs, and C. Justifications for why its actions were prudent.

against short-term price spikes.⁴ The topics included are: 1) Availability and cost of contracting, hedging, and supply options to mitigate the risk of short-term price spikes; 2) Utilization of baseload purchases; 3) Optimization of Company-owned and third-party storage facilities; 4) Optimization of peak shaving facilities; 5) Potential for improvement of interstate pipeline supplier diversity; and 6) A monthly forecast of the upcoming winter heating season which includes demand minimum, average and maximum load requirements and the Company's planned mix of baseload, spot supply and storage by day.⁵ The short-term demand-related reporting requirements include: 1) Development of interruptible tariffs that contain an economic curtailment provision; and 2) Research and development concerning voluntary conservation efforts directed at the general public.⁶

The Commission didn't identify any long-term supply or demand reporting requirements. Rather, the Commission initiated a Gas Integrated Resource Plan (IRP) process that combined long term supply and demand issues.⁷

Regarding the questions included in the Commission's Notice of Comment in this proceeding, they include the following:

- Does the natural gas utilities annual compliance filings comply with the Commission's Orders?
- Should the compliance filings be accepted and approved?
- Should the Commission make any changes to future compliance filing requirements?
- Are there other issues or concerns related to this matter?

II. PROCEDURAL BACKGROUND⁸

February 12 through 22, 2021	A combination of significant disruptions in natural gas supply combined with a sharp rise in natural gas demand, led to an extraordinary increase in natural gas spot market prices in Minnesota. The effects of the price spike were amplified by the closure of the wholesale natural gas markets for the three-day Presidents Day holiday weekend (February 2021 Pricing Event).
February 23, 2021	The Commission held a Planning Meeting regarding the PE and authorized an investigation into the Pricing Event in Docket No. G999/CI-21-135.
March 2, 2021	The Commission issued an Order Opening Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers in Docket No. G999/CI-21-135.

⁴ Ibid at Order Pts. 5, 6, 7, 11, 12, and 14.

⁵ Topics 5 and 6 are to be filed in a company's demand entitlement and annual hedging filings respectively.

⁶ Ibid at Order Pt. 2 and 11.

⁷ Ibid at Order Pt. 16.

⁸ Attachment 1 provides a more detailed procedural background for this proceeding. The Department truncated this section of its comments for editorial purposes. This proceeding has been active for three and a half years and included a contested case hearing with four utilities and numerous interested parties participating. A complete table delineating the procedural background would take several pages.

March 10, 2021	The Commission issued a request for initial filings and notice of comments period with an initial date of April 9, 2021, in Docket No. G008/M-21-135.
March 22 through July 19, 2021	The Commission solicited comments from affected utilities and interested parties on the procedural, cost-recovery and policy issues identified in the wake of the February 2021 PE.
August 30, 2021	The Commission issued its ORDER GRANTING VARIANCES AND AUTHORIZING MODIFIED COST RECOVERY SUBJECT TO PRUDENCE REVIEW, AND NOTICE OF AND ORDER FOR HEARING. This Order created Docket No. G002/CI-21-610.
September 20, 2021, through May 24, 2022	The Office of Administrative Hearings (OAH) held a contested case hearing on the issue and provided its report on findings of fact, conclusions of law and recommendation.
October 19, 2022	The Commission issued its ORDER DISALLOWING CERTAIN NATURAL GAS COSTS AND REQUIRING FURTHER ACTION.
February 17, 2023	The Commission issued its ORDER REQUIRING ACTIONS TO MITIGATE IMPACTS FROM FUTURE NATURAL GAS PRICE SPIKES, SETTING FILING REQUIREMENTS, AND INITIATING A PROCEEDING TO ESTABLISH GAS RESOURCE PLANNING REQUIREMENTS.
August 1, 2023, through July 30, 2024	Xcel filed 2023 Annual Compliance Filing (ACF). The Department provided comments on that filing. The Commission issued an order accepting and approving the 2023 ACF.
January 26, 2024 August 2024	Xcel filed compliance on cost impacts due to extreme market conditions. Xcel filed its 2024 Annual Compliance Filing (ACF). The Commission issued a notice of comment period for Xcel's 2024 ACF.

III. DEPARTMENT ANALYSIS

The Department's analysis begins with its responses to the Commission's questions included in its Notice of Comment (NOC) Period in these proceedings dated August 29, 2024. Next, the Department summarizes Xcel's Gas Practices Compliance (GPC) filing. This filing discussed the Company's plans for modifying its internal processes to mitigate the risk of short-term price spikes.⁹ The Department reconciles the information in the Company's 2024 ACF with the ACF reporting requirements included in the Commission February 17, 2023 Order. The Department then develops an analysis to review XE's efforts to mitigate the short-term price spike resulting from the January 2024 PE relative to the Company's response during the February 2021 PE.

⁹ Xcel's Comments – Gas Practices was filed on September 15, 2022, in this proceeding (Comments – Gas Practices).

A. *RESPONSES TO COMMISSION'S QUESTIONS*

The Department provides its responses to the Commission's questions follow in the order presented in the NOC.

A.1. *Does the natural gas utilities annual compliance filings comply with the Commission's Orders?*

The Department believes that Xcel's 2024 Annual Compliance Filing (ACF) complies with the Commission's Orders related to this proceeding.

A.2. *Should the compliance filings be accepted and approved?*

The Department recommends the Commission accept and approve Xcel's 2024 ACF.

A.3. *Should the Commission make any changes to future compliance filing requirements?*

The Department did not identify any changes that it recommends the Commission implement regarding future compliance filing requirements.

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

The Department did not identify any issues or concerns at this time.

B. *SUMMARY OF XCEL'S GAS PRACTICES COMMENTS*

During its review of the prudence of the four utilities seeking the recovery of extraordinary gas costs in August 2022, the Commission required the gas utilities to file a plan that addressed the question of how those same utilities were modifying their practices to protect ratepayers from future extraordinary gas prices spikes.¹⁰

The Company filed its Gas Practices Comments (GPC) on September 15, 2022, in response to that Commission Notice of Comments. Xcel listed six supply-side and two demand-related modifications it had implemented since the February 2021 Pricing Event.

¹⁰ See Commission Notice of Comments issued August 23, 2022, in Docket Nos. G999/CI-21-135, G008/M-21-138, G004/M-21-235, G002/CI-21-610 and G011/CI-21-611.

B.1. Modifications implemented since the February 2021 PE

The supply-related changes included:

- 1) Procuring new transportation service agreements that allow the Company to strengthen the geographic diversity of supply;
- 2) Reviewing the Company's baseload purchasing strategy;
- 3) Adding the Company's internal temperature forecast to the TELSA load forecasting model;
- 4) Advocating for changes to the North American Energy Standards Board (NAESB) standard contract for gas purchasing;
- 5) Regularly evaluating whether new or additional storage contracts can be added to the Company's portfolio; and
- 6) Entering a peaking supply deal during the 2021-2022 heating season, where the Company had the right to call on daily supply priced at the First of the Month index.¹¹

The demand-related changes included:

- 1) A continuation of the Communication Plan it filed on November 1, 2021, in this proceeding¹² and
- 2) An economic curtailment proposal the Company formulated with the three other rate-regulated gas utilities.¹³

These modified practices then formed the basis for the ACF reporting requirements.

B.2. Natural Gas IRP

The Company discussed Gas IRP in some detail. Given the amount of attention the Commission has given this process over the year or two, the Department doesn't see much value in summarizing Xcel's discussion of this topic in this proceeding.

C. UPDATE ON XCEL'S EFFORTS TO MITIGATE THE RISK OF SHORT-TERM NATURAL GAS PRICE SPIKES

The Department reconciles the Commission's ACF reporting requirements with the information the Company included in its 2024 ACF filed August 1, 2024. The Department then reviews the Company's performance during the January 2024 Pricing Event to determine if XE's modifications to lower ratepayers' risk from short-term price spikes has been successful.

¹¹ Comments – Gas Practices at p. 2.

¹² *Ibid* at 17. Xcel's proposed communication tactics were to use 1) news releases; 2) the Company's webpage and; 3) social media for the public. For commercial and industrial customers Xcel proposed using; 4) automated phone calls; 5) email (when possible) and; 6) text messages. The company would also include a recorded message on the customer service line for all callers to the call center and provide messaging to external-facing employees.

¹³ *Ibid* at 19.

C.1. Pipeline Transportation Contracts and Geographic Diversity of Supply - Update

The Department asked about this topic in Department IR #73 requesting a narrative that discussed the Company efforts since the February 2021 PE.¹⁴ Xcel responded:

The Company's gas supply strategy is to purchase baseload gas at geographically diverse locations from which we have firm transportation service to deliver to our system. Our strategy limits our exposure to a spike in spot market prices at any single location. On an average day, this also allows the Company the ability to choose optimal locations for purchase price for our customers.

In Department IR #78, the Department asked about Xcel's efforts to use transportation capacity on interstate or in-state pipelines to mitigate the risk of short-term price spikes during the winter heating season.¹⁵ The Company explained:

Transportation agreements provide the opportunity to mitigate price spikes by providing access to geographically diverse supply. . . . The Company builds its gas transportation and storage portfolio with a focus to deliver safe, reliable, geographically diverse, gas service at a reasonable cost for its customers. The Company's plan provides significant operational and cost benefits to its customers through access to a geographically diverse supply mix, storage services, baseload supplies, and spot market purchases.

The Company transports most of its natural gas supply on Northern Natural Gas (NNG), Viking Transmission (Viking) and WBI Transmission (WBI) pipelines, which are the only interstate pipelines directly connected to our distribution systems. The Company also relies on Northern Border pipeline, Great Lakes Gas Transmission (GLGT), and ANR Pipeline Company (ANR-P), which are not directly connected to our distribution systems. The Company holds storage services on NNG, ANR-P, and ANR Storage Company (ANR-S). This array of pipeline and storage services provides geographic diversity and strengthens the reliability of the Company's natural gas supply.

Of NSP's entire demand entitlements portfolio, approximately 31 percent is from storage (excluding peak shaving facilities), and the remainder from various receipt points. The three largest are NNG Ventura (18 percent), Emerson (17 percent), and Chicago (12.7 percent). No single supply source (after accounting for storage) accounts for more than approximately 15

¹⁴ Attachment 2 includes Department IR #73 as well as the Company's response.

¹⁵ **TRADE SECRET** Attachment 3 includes Department IR #78 as well as the Company's response.

percent of supply. This provides substantial geographic diversity and increases supply reliability.

Xcel noted the costs and benefits of the geographic diversity of supply associated with these various agreements are difficult to calculate. The Company also noted that currently transportation capacity in the Upper Midwest is fully subscribed.

Two examples of the benefits of geographic diversity are the two contracts for incremental pipeline capacity Xcel concluded with Viking which allowed the Company to purchase additional gas at Emerson and to hold storage on ANR-S.¹⁶ The Department appreciates Xcel's efforts in this regard. Both price spikes have occurred primarily on NNG. Any efforts to purchase more natural gas from Western Canada or the Eastern United States are helpful in the effort to diversify natural gas supply.

C.2. Baseload Purchasing and Gas Contracting

The Department's review is summarized in **TRADE SECRET** Tables 1 and 2 (following pages). Table 1 compares Xcel's winter heating season actuals for 2020-2021 and 2023-2024.

The information in **TRADE SECRET** Table 1 is interesting in that the actuals for the 2023-2024 heating season showed Xcel purchasing **[TRADE SECRET DATA HAS BEEN EXCISED]** Dths than it did during the 2020-2021 heating season. At the same time, the amount of **[TRADE SECRET DATA HAS BEEN EXCISED]** the Company purchased **[TRADE SECRET DATA HAS BEEN EXCISED]** Dths. In addition, the actual volumes of **[TRADE SECRET DATA HAS BEEN EXCISED]** Dths. These results suggest that Xcel **[TRADE SECRET DATA HAS BEEN EXCISED]**.

However, these results highlight the difference between forecasted volumes and actual volumes purchased. The Company explained in its response to Department IR 74:

First, NSPM considers baseload purchases to be a combination of multi-month or "term supplies" and single month "monthly deals". The Company has maintained its planned increase in baseload supplies over that of the 2020-2021 heating season. However, actual conditions have dictated a flexible approach to actual purchase levels. For example, while winter 2023-2024 baseload was planned to be approximately 12% higher than the 2020-2021 levels, actual baseload purchases ended only 8% higher than winter 2020-2021 . . . As a result of warmer than normal conditions most of the winter, the Company reduced its monthly baseload purchases to remain within storage contract requirements. . . For the 2024-2025 winter season the Company is again planning for approximately 12% higher baseload purchases than the 2020-2021 heating season. However, if the 2024-2025 winter continues its early season warmth, this year's baseload purchases will likely be like last winter's 8% levels.

¹⁶ Comments – Gas Practices at p. 4.

TRADE SECRET Table 1 - Comparison of Xcel's Actual Purchases for 2020-2021 and 2023-2024 Winter Heating Seasons¹⁷

Line No.	Purchases	2020-2021		2023-2024		Difference	
		Actuals		Actuals		Actuals	
		Dth	Percent	Dth	Percent	Dth	Percent
	[TRADE SECRET DATA HAS BEEN EXCISED]						
1.							
2.							
3.							
4.							
5.							
6.							

This example demonstrates that winter weather also plays a role in how a gas utility attempts to manage short-term price risk. In this instance the warm weather resulted in a lower demand for gas, so the Company displaced monthly baseload contracts with storage volumes and daily or spot gas.

The Department included the comparison of the 2020-2021 and 2023-2024 winter procurement strategies since the January 2024 Pricing Event occurred during that period.

In summary, Xcel planned to increase the amount of baseload gas purchased during the winter by 12% between 2020 and 2023. However, due to warmer winter weather in late 2023 early 2024, the Company only purchased 8% more baseload gas.

Table 2 compares the 2023-2024 and 2024-2025 winter heating season plans.

The information in **TRADE SECRET** Table 2 shows Xcel forecasting that it will increase baseload purchases and decrease the amount of daily or spot gas it purchases. Those plans are more consistent with the Department's expectations.

¹⁷ **TRADE SECRET** Attachment 4 includes Department IR 74 as well as the Company's response.

TRADE SECRET Table 2 - Comparison of Xcel's Actual Purchases for the 2023-2024 and Forecasted Purchases for the 2024-2025 Winter Heating Seasons

		2023-2024		2024-2025		Difference	
		Actuals		Forecast			
Line No.	Purchases	Dth	Percent	Dth	Percent	Dth	Percent
	[TRADE SECRET DATA HAS BEEN EXCISED]						
1.							
2.							
3.							
4.							
5.							
6.							

Order Point 6 of the Commission's February 17, 2023, Order requires affected utilities to discuss plans to incorporate more baseload purchases. It appears that Xcel has complied with that reporting requirement.

C.3. Supply Margin Reserve

This issue was initially discussed in the Direct Testimony of Matthew J. King from GDS Associates on behalf of the Department.¹⁸ Mr. King noted that it is typical practice for a gas utility to hold sufficient firm transportation rights and local resources to meet the utility's usage on the historically coldest day it has recorded and the corresponding forecasted demand on its distribution system. The difference between the supply and demand is defined as the Supply Reserve Margin. In its February 17, 2023 Order, the Commission included a requirement that utilities focus on improving their supply reserve margin efforts to minimize those quantities.

Xcel discussed its efforts to include a more accurate local weather forecast in its TELSA load forecasting model in its GPC. Improving a load forecasting tool by including local weather information is one example of how a utility can improve its supply reserve margin, assuming this change improves the accuracy of the Company's daily load forecasts. XE also discussed this topic in its 2024 ACF, noting: "The Company endeavors to continuously monitor, evaluate and improve the accuracy of its forecasts as a critical factor in providing a reasonable gas supply reserve margin."¹⁹

Significantly improving the accuracy of a daily load forecast is not an easy task. The Department notes Xcel's efforts and concludes the Company complied with the reporting requirement in the Commission's February 17, 2023, Order at Order Point 8.

¹⁸ Direct Testimony of Matthew J. King – Revised, Docket No. G002/CI-21-610, filed February 14, 2022, at p. 17.

¹⁹ Annual Compliance Filing, August 1, 2024, at p. 11-13.

C.4. NAESB Standard Gas Purchasing Contract

This reporting requirement is included in Order Point 4 of that same Commission Order. Xcel pursued beneficial reforms to the document but was unsuccessful in its efforts.²⁰ Specifically, a weighted vote by NAESB's participants rejected Xcel's proposal. The Department notes Xcel's efforts and concludes the Company complied with the reporting requirement in the Commission's February 17, 2023, Order at Order Point 4.

C.5. Contracting, Hedging and Supply Options

Xcel noted its efforts to pursue various supply options that may provide price protection against short-term price spikes. The Company noted FOM baseload contracts, underground storage, and financial hedges in this discussion. Xcel also noted that it had proposed to pilot several new or different financial hedging tools in its recent filing to extend the rule variances that allow for the recovery of the costs of financial instruments through the PGA.²¹ The Commission approved that request for variance and the piloting of the new or different financial hedging tools in an Order dated May 21, 2024, in this docket. Department IR #77 asked about the Company's financial hedging efforts.²² Xcel's response didn't identify any new efforts or information.

This reporting requirement was included in Order Point 5 in that same Order. The Department concludes that the Company has complied with this Order Point.

C.6. Underground Storage

Order Point 7 of the Commission's February 17, 2023, Order addressed the topic of Xcel exploring modifications to storage inventory management that could preserve withdrawal capabilities for later in the winter." Xcel provided a detailed discussion of its reasoning for using NNG's Four-Step Firm Deferred Delivery (FDD) Withdrawal Option in its 2024 ACF.²³

The Department reviewed the Company's discussion and considered it reasonable. The Department then asked IR #75 that relates to Xcel's efforts to expand third-party underground storage volumes.²⁴ The Company responded that it continues to its efforts to secure additional third-party storage. Xcel cited two opportunities it had worked on, but that didn't materialize.

The Department notes Xcel's efforts and concludes the Company complied with the reporting requirement in the Commission's February 17, 2023, Order at Order Point 7.

²⁰ *Ibid.* at p. 3.

²¹ Docket No. G002/23-521.

²² Attachment 5 includes a copy of Department IR no 77 and Xcel's response.

²³ Xcel Annual Compliance filing filed August 1, 2024, at p. 7-11.

²⁴ Attachment 6 includes a copy of Department IR #75 and Xcel's response.

C.7. Peak Shaving Update

Order Points 13 and 14 of the Commission's February 17, 2023, Order addressed this topic. The former addresses the factors the Company needs to consider regarding peak-shaving dispatch decisions. The latter focuses on the development of dynamic proposal for calling on peak-shaving facilities. Xcel noted in its 2024 ACF that it will evaluate the possibility of using peak-shaving resources during extreme pricing events for price mitigation. The Company also noted that it would use its Wescott LNG facility for this purpose and that it would do so for the 2023-2024 heating season. Hence, Xcel's adoption of this new protocol was in effect during the January 2024 PE.

The performance of Xcel's peaking facilities was an issue in the contested case aspect of this docket.²⁵ Department IR #76 focused on the topic of what improvements the Company had completed since the February 2021 PE.²⁶ Xcel noted that it had completed several investments that have been focused on improving the safe and reliable operation of those facilities. The Department also asked about economic dispatch of those facilities and Xcel responded that it had dispatched its peaking facilities during the January 2024 PE. That was an action the Company could not perform during the February 2021 PE.

The Department notes Xcel's efforts and concludes the Company complied with the reporting requirement in the Commission's February 17, 2023, Order at Order Points 13 and 14.

C.8. Supply Mix Across Different Load and Weather Conditions

Order Point #10 of the February 17, 2023, Order addresses this topic. Xcel provided this information in its 2024 ACF.²⁷ The Department reviewed the information and found it to be consistent with the Commission's preference for mitigating the risk of short-term prices spikes for ratepayers, particularly the Maximum Load scenario.

The Department notes Xcel's efforts and concludes the Company complied with the reporting requirement in the Commission's February 17, 2023, Order at Order Point 10.

C.9. Update on Customer Communications

The Department didn't identify a Commission Order Point included in its February 17, 2023, Order for this topic. The Department notes that Xcel did update its protocol for contacting customers when spot prices for natural gas have increased significantly since the February 2021 PE. The Company now initiates communications when the average price for all spot or swing purchased for the day (or weekend) ahead is greater than or equal to five times the cost of gas filed in the Purchased Gas

²⁵ ORDER DISALLOWING RECOVERY OF CERTAIN NATURAL GAS COSTS AND REQUIREING FURTHER ACTION, issued October 17, 2022, in Docket No. G002/CI-610, at Order Point 3.

²⁶ **TRADE SECRET** Attachment 7 includes a copy of Department IR #76 and Xcel's response.

²⁷ 2024 ACF, filed August 1, 2024, at p. 14-15.

Adjustment for the current month (PGA).²⁸ Xcel contacts customers by way of the communication channels outlined in its GPC. The Company did activate its communications efforts on Friday January 12, 2024, the day before the 2024 January PE began.

C.10. Interruptible Customers Curtailment

The Commission rejected the Joint Utilities Economic Dispatch Proposal (EDP) in its February 17, 2023, Order at Order Point #1. The Commission did include a requirement that all the affected utilities file updates to their existing interruptible tariffs to address economic interruptions. The Commission also noted the affected utilities could also propose new or alternative interruptible tariffs.²⁹

The Company noted that it had included updates to its interruptible tariffs in Scott S. Hults' Direct Testimony and Gerald E. Traut's Rebuttal Testimony in Docket No. G002/GR-23-413 (23-413 docket), the Company's 2023 gas rate case. Parties reached a global settlement in that proceeding and it is awaiting regulatory action by the Commission.³⁰

Assuming the Commission approves the settlement 23-413 docket, Xcel will have complied with the Commission's requirement included in Order Point 2 of its February 17, 2023, Order.

Turning to the January 2024 PE, Xcel curtailed all its interruptible customers beginning at midnight January 14, 2024.³¹ Two hundred eighty-three of the interruptible customers out of a total of three hundred twenty-seven complied with the order to curtail their gas usage.

Department IR #72 asked for the potential interruptible load, the actual interruptible load and the percentage of Xcel's Minnesota interruptible customers load that was curtailed on January 13 through 16, 2024.³² Over the four-day event, the Company estimated that 60% of its interruptible customers curtailed their usage thereby avoiding the use of 118,964 Dths of natural gas.

Xcel has been diligent in pursuing the Commission's directives regarding the economic dispatch of interruptible customers. The Department recognizes the Company's efforts and concludes the Company has complied with the Commission's direction in this proceeding.

²⁸ This topic is discussed in Department IR #80. Attachment 8 includes Department IR #80 as well as the Company's response.

²⁹ February 17, 2023, Order at Order Pt. 2.

³⁰ Compliance filing, January 26, 2024, at p. 2.

³¹ The Office of the Attorney General – Residential Utilities Division (OAG-RUD) issued information request #29 on this topic. The information included is taken from the Company's response to that IR. Attachment 9 includes a copy of that IR and Xcel's response. Some of this information was also included in the Company's January 26, 2024, Compliance filing at page 3.

³² Attachment 10 includes a copy of Department IR #72 and Xcel's response.

C.11. Gas IRP Update

The Department didn't identify any specific information regarding this topic in the Company's 2024 ACF. The Company had discussed this topic in the GPC filing.³³

*D. COMPARISON OF XCEL'S RESPONSES TO THE JANUARY 2024 AND
FEBRUARY 2021 PRICING EVENTS*

The Department planned to provide the Commission with an analysis that tested the Company 2024 portfolio using the conditions and gas prices like those experienced during the February 2021 PE. Xcel declined to provide this analysis noting: "the parameters of the "stress test" are not defined, and the Company has not developed tools for conducting such a test."³⁴ As a result, the Department had to develop another approach to attempt to compare Xcel's gas practices for the two pricing events.

D.1. Gas Delivered During the January 2024 Pricing Event - Volumes and Prices

Xcel provided a preliminary estimate of total costs it incurred during the January 2024 four-day pricing event. That amount was **[TRADE SECRET DATA HAS BEEN EXCISED]** million.³⁵ Department IR # 85 asked Xcel to provide summary information regarding the Company's purchases, storage and peak shaving facilities utilized during the January 2024 PE. **TRADE SECRET** Table 3 (following page) summarizes the information XE provided in its response to that information request.

The Department notes that Xcel did dispatch its peak shaving facilities during the January 2024 PE, unlike its response to the February 2021 PE. The Company also appears to have maximized its storage withdrawals during the January 2024 PE. Both those decisions are consistent with the Commission's directives in these dockets.

Xcel noted in its January 26, 2024, Compliance filing that the Company had:

- Purchased **[TRADE SECRET DATA HAS BEEN EXCISED]** per day of gas for the balance of the month beginning on January 10, at a fixed price of **[TRADE SECRET DATA HAS BEEN EXCISED]**. This transaction removed that amount from the daily spot total purchases.
- Purchased **[TRADE SECRET DATA HAS BEEN EXCISED]** of gas at fixed prices in the daily market on January 12 as opposed to purchasing all daily supplies at the daily market index price. The average price of those purchases was **[TRADE SECRET DATA HAS BEEN EXCISED]**. The reported Northern Ventura daily index price over that four-days was **[TRADE SECRET DATA HAS BEEN EXCISED]**. Those fixed price purchases appear to have avoided \$3.2 million in additional costs ratepayers would have incurred if Xcel had not completed the purchases.

³³ GPC filing submitted September 15, 2022, at p. 23.

³⁴ Attachment 11 includes Department IR #82 and the Company's response.

³⁵ Compliance filing in Docket No. G002/CI-21-610, filed January 26, 2024, at page ?.

TRADE SECRET Table 3 – Summary of Volumes Delivered by Supply Type, Percentage of Supply, Average Cost and Total Cost January 2024 Pricing Event³⁶

Line No.	Description	Total Vols (Dths)	Percent of Total Supply	Avg. Price/Dth.	Total Cost
	[TRADE SECRET DATA HAS BEEN EXCISED]				
1.					
2.					
3.					
4.					
5.					
6.					

The Company also noted that its average purchase price for gas on the daily market was **[TRADE SECRET DATA HAS BEEN EXCISED]** and Xcel’s overall average cost of gas during the event was **[TRADE SECRET DATA HAS BEEN EXCISED]**. Both those resulting costs of gas compare favorably to the NNG-Ventura January 2024 weighted average cost of gas which was noted above.

The Department used previously submitted information provided in this proceeding to estimate the percentages of total supply the Company had called upon during the four coldest days of the February 2021 Pricing Event.³⁷ The Department then replaced the actual percentage of the different supply options used in the January 2024 Pricing Event with those it had calculated for that four-day period during the February 2021 Pricing Event. Trade Secret Table 4 contains this information.

³⁶ **TRADE SECRET** Attachment 12 includes Department IR #85 and the Company’s response.

³⁷ Report filed April 9, 2021, p. 36, Table 5.

**TRADE SECRET Table 4 – Summary of Volumes Delivered by Supply Type, Average Cost and Total Cost
Substituting Supply Percentages from February 2021 Pricing Event**

Line No.	Description	Total Vols (Dths)	Percent of Total Supply	Avg. Price/Dth.	Total Cost
1.	[TRADE SECRET DATA HAS BEEN EXCISED]				
2.					
3.					
4.					
5.					
6.					

The percentage of supply provided by baseload gas increased from **[TRADE SECRET DATA HAS BEEN EXCISED]** in 2021 and 2024 respectively. The percentage of supply sourced from storage increased from **[TRADE SECRET DATA HAS BEEN EXCISED]**. The percentage of supply provided by peak shaving resources increased from **[TRADE SECRET DATA HAS BEEN EXCISED]**. All those increases are consistent with Xcel’s efforts to mitigate the risk of short-term price spikes. As for the percentage of supply provided by Daily Supply it decreased from **[TRADE SECRET DATA HAS BEEN EXCISED]**.³⁸ This movement away from the use of daily contracts is also consistent with the Company’s efforts to mitigate the risks of short-term price spikes.

Trade secret Table 5 (following page) compares the costs Xcel incurred during the January 2024 PE and the costs the Company would have incurred if it had used the same percentages of supply as it had used during the February 2021 PE.

The Department estimates that the changes Xcel has implemented to its gas practices since the February 2021 PE avoided **[TRADE SECRET DATA HAS BEEN EXCISED]** in gas commodity costs during the January 2024 PE. This analysis suggests that the Company’s efforts to mitigate short-term price risk since 2021 lowered the gas costs ratepayers would have incurred during the January 2024 PE by approximately 30% had the practices not been updated.

³⁸ The Department couldn’t locate the figures for Firm Swing Peaking purchases in the 2021 information. Hence, it used the 2024 information as a proxy.

TRADE SECRET Table 5 – Difference in Volumes and Costs for the Two Pricing Events

Line No.	Description	Difference Vols	Total Cost - Actual	Total Cost - Using 2021 Info	Difference
	[TRADE SECRET DATA HAS BEEN EXCISED]				
1.					
2.					
3.					
4.					
5.					
6.					

D.2. Curtailment of Interruptible Customers and Voluntary Conservation Efforts

The Department reviewed Xcel’s efforts regarding these two topics in a previous section. The Department notes that Xcel curtailed interruptible customers and initiated a customer communication effort during the January 2024 PE.

E. EXTRAORDINARY GAS COST-RECOVERY AND MISCELLANEOUS

E.1. Recovery of Extraordinary Gas Costs

The Department provided an update on the Company’s efforts to recover the Extraordinary Gas Costs (EGCs) resulting from the February 2021 PE in its comments on Xcel’s 2023 ACF. The Department includes a similar update for the Company’s 2024 ACF. In Department IR #83 the Department asked about the status of the recovery of the \$159,251,324 of EGCs and how the actual rate of cost recovery is, compared to what the Company had forecasted.³⁹

Xcel explained in its response that as of October 1, 2024, the EGUs were \$42,572,552 under-recovered. The Company noted that \$4,666,143 of that amount related to the under-recovery of the expenses for the non-Residential classes at the end of the initial 27-month recovery period. Xcel incorporated this \$4.7 million under-recovery into its 2024 Annual Purchased Gas Adjustment (PGA) True-up filing.⁴⁰ Thus, the Company proposed to recover that \$4.7 million as part of its monthly PGA true-up factors which have been in place since September 2024 and will be in place until August 2025.

In support of this approach, Xcel referenced Order Point 5 of the Commission’s October 19, 2022, Order in this docket which states: “Xcel shall incorporate any remaining true-up into its next annual automatic adjustment report following the 27-month and 63-month recovery periods. “

³⁹ Attachment 13 contains a copy of Department IR #83 and Xcel’s response.

⁴⁰ 2024 Annual Purchased Gas Adjustment (PGA) True-up filing, docket no. G002/AA-24-304, filed September 3, 2024.

The Department also asked if the Company is under-recovered as of the end of its Commission approved 63-month recovery period in November 2026, would Xcel incorporate the under-recovered amount into the next Annual PGA filing in September of 2027. The Company noted that it would and that its most recent estimate is that it will be roughly \$764,000 under recovered as of December 31, 2026, and that it would attempt to recover any under-recovered amount in its September 2027 Annual PGA filing.

The Department has no concerns relative to this matter. CenterPoint's proposal appears to be consistent with the Commission's directions.

E.2. Recovery of January 2024 PE Gas Costs

The Department assumes that Xcel will propose to recover the **[TRADE SECRET DATA HAS BEEN EXCISED]** million in the Company's September 2027 PGA Annual Automatic Adjustment filing. The basis for this conclusion is that Xcel has not requested a variance to the PGA rules that would allow it to employ an approach like that which it used for the February 2021 PE. If the Department's reasoning is not correct, the Department asks that Xcel explain how it proposes to recover those gas costs in reply comments.

IV. RECOMMENDATIONS

Based on analysis of Xcel's 2024 ACF and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. RESPONSE TO COMMISSION QUESTIONS

The Department recommends the Commission:

- A.1. - conclude Xcel's 2024 ACF complies with the Commission's Orders in this proceeding.
- A.2. – accept and approve Xcel's 2024 ACF.
- A.3. – not make any changes to future compliance filing requirements.
- A.4 – conclude no issues or concerns at this time

B. SUMMARY OF XCEL'S GAS PRACTICES COMMENTS

The Department has no recommendations regarding this section.

C. UPDATE ON XCEL'S EFFORTS TO MITIGATE THE RISK OF SHORT-TERM NATURAL GAS PRICE SPIKES

The Department recommends the Commission accept and approve the Company's 2024 Annual Compliance filing as being compliance with the Commission's reporting requirements regarding that filing included in its February 17, 2023, Order.

*D. COMPARISON OF XCEL'S RESPONSES TO THE JANUARY 2024 AND
FEBRUARY 2021 PRICING EVENTS*

The Department notes that its comparison of the Company's purchasing strategies during the two pricing events suggests that changes to Xcel's contracting and purchasing strategies as well as increased use of its peaking and storage facilities mitigated some of the short-term risk of price spikes.

The Department has no recommendations regarding this section.

E. EXTRAORDINARY GAS COST RECOVERY AND MISCELLANEOUS

The Department has no recommendations regarding this section.

ATTACHMENTS

Attachment 1 – Detailed Procedural Background for Docket No. G002/CI-21-610

February 12 through 22, 2021	A combination of significant disruptions in natural gas supply combined with a sharp rise in natural gas demand, led to an extraordinary increase in natural gas spot market prices in Minnesota. The effects of the price spike were amplified by the closure of the wholesale natural gas markets for the three-day Presidents Day holiday weekend (February 2021 pricing event).
February 19, 2021	CenterPoint filed a letter with the Commission in Docket No. G008/M-21-138 noting the severity of its gas cost under-recovery and indicating a concern that the existing Annual Automatic Adjustment (AAA) might be inadequate to address an under-recovery of this magnitude.
February 23, 2021	The Commission held a Planning Meeting regarding the PE and authorized an investigation into the Pricing Event in Docket No. G999/CI-21-135.
March 2, 2021	The Commission issued an Order Opening Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers in Docket No. G999/CI-21-135.
March 10, 2021	The Commission issued a request for initial filings and notice of comments period with an initial date of April 9, 2021, in Docket No. G008/M-21-135.
April 9, 2024	Northern States Power of Minnesota d/b/a Xcel Energy (Xcel, XE) filed comments in response to the Commission Notice dated March 10, 2021, in Docket No. G999/CI-21-135.
May 13, 2021	The Commission discussed procedural issues regarding the two dockets at its weekly Agenda Meeting.
May 19, 2021	The Commission issued a notice of comment period which included questions related to the prudence and potential recovery of costs associated with the February 2021 PE.
June 9, 2021	The OAG-RUD filed a letter requesting an extension for filing comments until July 8, 2021 in response to the Commission's May 19, 2021 notice of comment.
June 14, 2021	The Commission issued a notice of extension variance for comments on prudence but maintaining previous comment periods for other topics until July 6, 2021.
July 6 - 16, 2021	CUB/ECC, CenterPoint, City of Minneapolis (Minneapolis) and OAG-RUD filed comments. The Gas Utilities (CenterPoint, Great Plains, MERC and Xcel) filed joint comments in response to the Commission's May 10 th NOC.

July 19, 2021	CenterPoint, CUB/ECC, the Department, the Gas Utilities, the Suburban Rate Authority (SRA), and Minneapolis filed reply comments.
August 2, 2021	OAG-RUD filed a letter correcting the disallowances it had proposed.
August 30, 2021	The Commission issued its ORDER GRANTING VARIANCES AND AUTHORIZING MODIFIED COST RECOVERY SUBJECT TO PRUDENCE REVIEW, AND NOTICE OF AND ORDER FOR HEARING. This Order created Docket No. G002/CI-21-610.
September 20, 2021	The OAH issued its first prehearing Order.
October 22, 2021	CenterPoint, Xcel, and the Joint Gas Utilities filed direct testimony.
November 1, 2021	CPE, Great Plains, MERC and Xcel filed a joint communication plan compliance filing.
December 22, 2021	CUB, the Department, and OAG-RUD filed direct testimony.
January 21, 2022	CenterPoint, Xcel and the Joint Utilities filed rebuttal testimony.
February 11, 2022	CUB, the Department and OAG-RUD filed surrebuttal testimony.
February 17, 18, and 23, 2022	The OAH held evidentiary hearings.
March 15, 2022	CenterPoint, CUB, the Department, the Joint Utilities, and OAG-RUD filed briefs.
March 25, 2022	CenterPoint, the Department and OAG-RUD filed reply briefs.
May 24, 2022	OAH filed its report on findings of fact, conclusions of law and recommendation.
June 3 and 6 2022	CPE, CUB, the Department, LIUNA/Minnesota/North Dakota and Minneapolis filed exceptions to the Administrative Law Judges Report.
August 23, 2022	The MPUC issued a notice of comment on forward-looking issues.
September 15, 2022	Joint Commenters filed comments.
October 14, 2022	CUB, the Department and the OAG-RUD filed reply comments.
October 19, 2022	The Commission issued its ORDER DISALLOWING CERTAIN NATURAL GAS COSTS AND REQUIRING FURTHER ACTION.
November 8, 2022	Xcel filed a petition for reconsideration of the Commission's October 19, 2022 Order.
November 18, 2022	The Department filed an answer to XE's request for reconsideration.
January 6, 2023	The Commission issued its ORDER DENYING PETITION FOR RECONSIDERATION.
February 17, 2023	The Commission issued its ORDER REQUIRING ACTIONS TO MITIGATE IMPACTS FROM FUTURE NATURAL GAS PRICE SPIKES, SETTING FILING REQUIREMENTS, AND INITIATING A PROCEEDING TO ESTABLISH GAS RESOURCE PLANNING REQUIREMENTS.
August 1, 2023	Xcel filed its 2023 annual compliance filing.

October 6, 2023	The Commission issued a notice of comments on XE's annual compliance filing.
November 1, 2023	The Department filed comments.
November 13, 2023	Xcel filed reply comments.
January 26, 2024	Xcel filed compliance on cost impacts due to extreme market conditions.
March 28, 2024	The Commission approved Xcel's 2023 compliance filing.
July 30, 2024	The Commission issued order accepting and approving Xcel's 2023 Annual Compliance Filing.
August 1, 2024	XE filed its 2024 Annual Compliance Filing (ACF).
August 29, 2024	The Commission issued a notice of comment period for Xcel's 2024 ACF.

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Xcel Energy Information Request No. 73
Docket No.: G002/M-21-610
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: October 31, 2024

Question:

Topic: Geographic Diversity of Supply
Reference(s): Customer Protection Plan filed September 15, 2022, at p. 2

1. Please provide a narrative that explains the Company's efforts since 2021 to increase the geographic diversity of its gas supply contracting and purchasing efforts.
2. Please include estimates of the costs and benefits of that effort to ratepayers.

Response:

The Company's gas supply strategy is to purchase baseload gas at geographically diverse locations from which we have firm transportation service to deliver to our system. Our strategy limits our exposure to a spike in spot market prices at any single location. On an average day this also allows the Company the ability to choose optimal locations for purchase price for our customers. A detailed discussion of how the Company diversifies its contracting and purchasing efforts, including costs and benefits, is provided in DOC Information Request No. 78.

Preparer: Justin Holstein
Title: Manager, Gas Resource Planning
Department: Gas Planning
Telephone: 303-571-2750
Date: November 7, 2024

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Xcel Energy Information Request No. 78
Docket No.: G002/M-21-610
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: October 31, 2024

Question:

Topic: Pipeline Capacity Contracts

1. Please provide a narrative that explains the Company's efforts since 2021 to use its transportation capacity on interstate or in-state pipelines (gas purchased during the heating season using different contract terms) to mitigate the risk of short-term price spikes.
2. Please include an estimate of the costs and benefits of the Company's effort referenced in (1) to ratepayers.

Response:

Transportation agreements provide the opportunity to mitigate price spikes by providing access to geographically diverse supply. The Company provides a discussion of the geographic diversity of its transportation portfolio annually as part of its Contract Demand Entitlement filing.

The Company builds its gas transportation and storage portfolio with a focus to deliver safe, reliable, geographically diverse, gas service at a reasonable cost for its customers. The Company's plan provides significant operational and cost benefits to its customers through access to a geographically diverse supply mix, storage services, baseload supplies, and spot market purchases.

The Company transports the majority of its natural gas supply on Northern Natural Gas (NNG), Viking Transmission (Viking), and WBI Transmission Inc. (WBI) pipelines, which are the only interstate pipelines directly connected to our distribution systems. The Company also relies on Northern Border Pipeline, Great Lakes Gas Transmission (GLGT), and ANR Pipeline Company (ANR-P), which are not directly connected to our distribution systems. The Company holds storage services on NNG, ANR-P, and ANR Storage Company (ANR-S). This array of pipeline and storage

services provides geographic diversity and strengthens reliability of the Company's natural gas supply.

Of NSP's entire demand entitlements portfolio, approximately 31 percent is from storage (excluding peak shaving facilities), and the remainder from various receipt points. The three largest are NNG Ventura (18 percent), Emerson (17 percent), and Chicago (12.7 percent). The result is a well-balanced, geographically diverse access to supply. The capacity portfolio provides access to five major price hubs (NNG Ventura, NNG Demarc, Emerson, Chicago, and ANR SW). No single supply source (after accounting for storage) accounts for more than approximately 15 percent of supply. This provides substantial geographic diversity and increases supply reliability.

Benefits of supply diversity are difficult to generically calculate. The benefit of a diverse supply is that the risk of a coincident spike at all locations concurrently is less likely. Therefore, it is difficult to forecast a cost benefit from a price spike at one location and not others. However, as an example of the benefits of supply diversity, had the Company purchased all its Emerson index priced spot supplies at Ventura prices over the MLK weekend event, gas costs would have been **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** higher.

For costs, the Company adds transportation entitlement to serve forecasted design day, and does so by balancing the cost of construction, ability to meet the load, and the desire for geographic diversity. As of today, there are no new, incremental costs directly associated with capacity acquired to further regionally diversify its supply portfolio. Generally, transportation capacity in our region is fully subscribed.

A portion of this response is marked "Non-Public" as it contains information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). The information derives independent economic value from not being generally known or readily ascertainable by others who could obtain a financial advantage from their use. Thus, Xcel Energy maintains this information as a trade secret pursuant to Minn. Rule 7829.0500.

Preparer: Justin Holstein
Title: Manager, Gas Resource Planning
Department: Gas Planning
Telephone: 303-571-2750
Date: November 7, 2024

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Xcel Energy Information Request No. 74
Docket No.: G002/M-21-610
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: October 31, 2024

Question:

Topic: Increased Baseload Purchases
Reference(s): Customer Protection Plan filed September 15, 2022, at p. 5 and 6.

Xcel noted in that document that the Company has purchased 12% more baseload purchased for the 2021-2022 heating season than it had for the 2020-2021 heating season.

1. Has the Company continued to purchase more baseload each heating season since 2021-2022?
2. Please complete the following tables 1 and 2.

Table 1

Line No.	Purchases	2020-2021		2023-2024		Difference	
		Winter Plan		Winter Plan		Winter Plans	
		DTH	Percent	DTH	Percent	DTH	Percent
1.	Baseload	-	0.0%	-	0.0%	-	0%
2.	Daily or Spot	-	0.0%	-	0.0%	-	0%
3.	Firm Swing	-	0.0%	-	0.0%	-	0%
4.	Storage Supply	-	0.0%	-	0.0%	-	0%
5.	Peaking Supply	-	0.0%	-	0.0%	-	0%
6.	Total System Purchases	-	0%	-	0%	-	
7.	Transport (3rd Party)	-		-		-	0%
8.	Total System Supply	-		-		-	0%

Table 2

Line No.	Purchases	2023-2024		2024-2025		Difference	
		Winter Plan		Winter Plan		Winter Plans	
		DTH	Percent	DTH	Percent	DTH	Percent
1.	Baseload	-	0.0%	-	0.0%	-	0%
2.	Daily or Spot	-	0.0%	-	0.0%	-	0%
3.	Firm Swing	-	0.0%	-	0.0%	-	0%
4.	Storage Supply	-	0.0%	-	0.0%	-	0%
5.	Peaking Supply	-	0.0%	-	0.0%	-	NA
6.	Total System Purchases	-	0%	-	0%	-	0%
7.	Transport (3rd Party)	-		-		-	0%
8.	Total System Supply	-		-		-	0%

3. Please include estimates of the costs and benefits of that effort to ratepayers.

Response:

1. First, NSPM considers baseload purchases to be a combination of multi-month or “term supplies” and single month “monthly” deals. The Company has maintained its planned increase in baseload supplies over that of the 2020-2021 heating season. However, actual conditions have dictated a flexible approach to actual purchase levels. For example, while winter 2023-2024 baseload was planned to be approximately 12 percent higher than 2020-2021 levels, actual baseload purchases ended only 8 percent higher than winter 2020-2021 as shown in Tables 1 and 2 below. As a result of warmer than normal conditions most of the winter, the Company reduced its monthly baseload purchases to remain within storage contract requirements (see our August 1, 2024 Annual Report in Docket Nos. G999/CI-21-135 and G002/CI-21-610, pages 5-6 for more information). For the 2024-2025 heating season the Company is again planning for approximately 12 percent higher baseload than the 2020-2021 heating season. However, if the 2024-2025 winter continues its early season warmth, this year’s baseload purchases will likely be similar to last winter’s 8 percent levels.

2. Please see below tables reporting planned quantities for an average winter day. Please note that values for “Transport (3rd Party)” have been left blank as the Company does not purchase supply for those customers and those costs are not paid for by our customers. Quantities for “Peaking Supply” have also been left blank. The Company interprets these values to represent gas from our LNG and propane Peak Shaving facilities, and such quantities are reserved for meeting design day conditions, reliability events, and economic dispatch for price mitigation. As such, those quantities are not included in the represented plan for an average day during the heating season.

Table 1

Line No.	Purchases	2020-2021		2023-2024		Difference	
		Winter Plan		Winter Plan		Winter Plans	
		DTH	Percent	DTH	Percent	DTH	Percent
		[PROTECTED DATA BEGINS]					
1	Baseload						
2	Daily or Spot						
3	Firm Swing						
4	Storage Supply						
5	Peaking Supply						
6	Total System Purchases						
7	Transport (3rd Party)						
8	Total System Supply						
						PROTECTED DATA ENDS]	

Table 2

Line No.	Purchases	2023-2024		2024-2025		Difference	
		Winter Plan		Winter Plan		Winter Plans	
		DTH	Percent	DTH	Percent	DTH	Percent
		[PROTECTED DATA BEGINS]					
1	Baseload						
2	Daily or Spot						
3	Firm Swing						
4	Storage Supply						
5	Peaking Supply						
6	Total System Purchases						
7	Transport (3rd Party)						
8	Total System Supply						
					PROTECTED DATA ENDS]		

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Preparer: Craig Rozman
Title: Manager
Department: Gas Supply
Telephone: 303-571-2844
Date: November 7, 2024

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Xcel Energy Information Request No. 77
Docket No.: G002/M-21-610
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: October 31, 2024

Question:

Topic: Financial Hedging
Reference(s): Customer Protection Plan, filed September 15, 2022, at p. 10.

1. Please provide a narrative that summarizes the Company's efforts since 2021 to optimize the use of financial hedging products.
2. Please provide a narrative that explains the Company's efforts since 2021 to increase the diversity of hedging products to include additional delivery points.
3. Please provide a narrative that explains the Company's efforts since 2021 to enter longer-term hedges.
4. Please include separate estimates of the costs and benefits of the Company's efforts referenced in (1) through (3) to ratepayers.

Response:

The Company employs financial hedges against monthly natural gas commodity price volatility to protect customers from high market prices for baseload gas. These hedges are designed to provide protection against longer-term trends in rising gas prices rather than spikes in the daily market. This hedging activity is annually reviewed and approved by the Commission. The currently approved hedging plan limits the Company to hedging no more than 50 percent of our annual expected winter requirements (through either physical storage or financial hedging), and no more than 25 percent of our annual expected winter requirements can be hedged with financial instruments. The 50 percent level has been determined to be a prudent target level when balancing costs and benefits of financial hedging programs. These financial instruments have proven to be quite costly in the past and, in many years, there is not enough gas price market volatility to make them beneficial.

In its recent Petition for an extension of rule variances to recover the costs of financial instruments through the purchased gas adjustment clause (PGA) in Docket No. G002/M-23-521, the Company proposed to pilot new or different tools for hedging. These included the incorporation of physical fixed price deals and a new financial product of gas daily (GD) swap agreements. The incorporation of these tools

into our hedge plan may provide additional measures to mitigate the impact of an extreme price spike. The Company continues to explore financial hedging (such as the GD swap agreements), or other solutions that would provide protection from daily price spikes, such as occurred during Winter Storm Uri. However, hedge products for this type of supply are extremely limited as suppliers do not want to take on the added risk of significant quantities under these type of supply arrangements. The Company was able to secure one physical swing supply arrangement for the winter of 2021-2022 for up to 10,000 Dth per day priced at the FOM Index to test the use of such options. For winter 2022-2023 and 2023-2024, suppliers were not willing to offer this type of supply option due to the high price uncertainty in the marketplace. The Company continues to survey the market for financial hedging products that would protect against daily price swings. However, while the Company may test some newer financial products, these products are not offered by the market at price levels or at quantity levels that would significantly offset cost risk.

Preparer: Craig Rozman
Title: Manager
Department: Gas Supply
Telephone: 303-571-2844
Date: November 7, 2024

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Xcel Energy Information Request No. 75
Docket No.: G002/M-21-610
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: October 31, 2024

Question:

Topic: Underground Storage
Reference(s): Customer Protection Plan filed September 15, 2022, at p. 13.

1. Please provide a narrative that explains the Company's efforts since 2021 to expand third-party underground storage.
2. Please include separate estimates of the costs and benefits of the Company's efforts referenced in (1) to ratepayers.

Response:

1. The Company has explored several options to expand its access to third-party underground storage since the 2020-2021 heating season. Unfortunately, storage services directly connected to our systems (i.e. storage from Northern Natural Gas) are completely full, and the pipeline has indicated that an expansion would either be unfeasible or uneconomic. Additional storage service from further away, mainly ANR Pipeline Co. or ANR Storage Co. are limited by pipeline capacity to bring additional daily withdrawal capacity to our service area. The Company did work with ANR Pipeline to put together a project that would make 75,000 dth/day of existing storage withdrawal capacity available at the Northern Border interconnect at NNG Ventura. The Company had a signed precedent agreement for the project and was classified as an anchor shipper for the open season which was posted on August 11, 2023. Unfortunately, the Company was outbid on the initial contract term for the entire capacity on offer. We continue to explore opportunities to expand our firm storage service.
 2. The benefits of underground storage services remain significant, however as no change has been able to be made to the portfolio there are no incremental cost or benefit impacts to customers of our efforts to report at this time.
-

Preparer: Justin Holstein
Title: Manager, Gas Resource Planning
Department: Gas Planning
Telephone: 303-571-2750
Date: November 7, 2024

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Xcel Energy Information Request No. 76
Docket No.: G002/M-21-610
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: October 31, 2024

Question:

Topic: Peak Shaving
Reference(s): Customer Protection Plan, filed September 15, 2022, at p.14.

1. Please provide a narrative that explains the Company's efforts since 2021 to upgrade Company's peak-shaving LNG facility at Wescott and its propane peak shaving facilities in Maplewood and Sibley.
2. Please provide a narrative that explains the Company's efforts since 2021 to economically dispatch those peak shaving facilities.
3. Please include separate estimates of the costs and benefits of the Company's efforts referenced in (1) and (2) to ratepayers.

Response:

1.
 - a. Since 2021, the Company has invested significant capital across all three peak-shaving plants. Investments have been focused on improving the safe and reliable operation of these facilities by upgrading aging components and the addition of operation and engineering headcount that support the plants.
 - b. Upgrades at the Wescott LNG Facility
 - i. Replacement of the fire water suppression system and gas detection equipment
 - ii. Routing of all process safety relief valves to the impoundment area
 - iii. Complete pipe integrity assessments of both vaporization and liquefaction process equipment
 - iv. Updated control system for both liquefaction and vaporization processes
 - v. Adding additional field instrumentation to increase control room visibility
 - vi. Installation of variable frequency drives for both LNG pumps and liquefaction heat exchangers

- vii. Construction of a new control room/administration building to provide plant operators with the latest technology to operate the plant.
- c. Significant investment is ongoing at both Sibley and Maplewood LPG sites.
 - i. New vaporization buildings and associated equipment has been 100% replaced at both locations
 - ii. Fire suppression and gas detection systems have been 100% replaced
 - iii. Replacement of all valves, LPG pumps, instrumentation and piping throughout both tank farms
 - iv. New propane truck unloading facilities at both locations
- 2. The Company has detailed its plans for economic dispatch of our peak shaving facilities in its annual compliance report (see response to DOC Information Request (IR) No. 79 and our Annual Report filed August 1, 2024 in Docket Nos. G999/CI-21-135 and G002/CI-21-610, pages 16-18). In addition, the Company covered the performance of the peak shaving plants during the Martin Luther King Jr. holiday weekend in our 14-Day report filed on January 26, 2024 in these same dockets.
- 3. Specific benefits to customers of economic dispatch would be gas supplies not purchased at the market price. As such it is impossible to estimate those future benefits. However, as an example, NSPM dispatched **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** over the MLK weekend event from its peak shaving plants. Assuming that those quantities would have been purchased from sellers at the NNG Ventura Hub, it saved customers **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]**. See response to DOC IR No. 81 for additional details.

Portions of this response are marked “Non-Public” as they contain information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). The information derives independent economic value from not being generally known or readily ascertainable by others who could obtain a financial advantage from their use. Thus, Xcel Energy maintains this information as a trade secret pursuant to Minn. Rule 7829.0500.

Preparer:	Kevin Joyce (part 1)	Justin Holstein (parts 2 & 3)
Title:	Senior Director	Manager, Gas Resource Planning
Department:	Gas Plants	Gas Planning
Telephone:	612-366-3184	303-571-2750
Date:	November 7, 2024	November 7, 2024

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Xcel Energy	Information Request No.	80
Docket No.:	G002/M-21-610	
Response To:	Minnesota Department of Commerce	
Requestor:	John Kundert	
Date Received:	October 31, 2024	

Question:

Topic: Customer Communications

Reference(s): Customer Protection Plan, filed September 15, 2022, at p. 19.

1. Please provide a narrative that explains the Company's efforts since 2021 to use its customer communications to persuade customers to use less natural gas voluntarily during price spikes,
2. Can the Company estimate the amount of load voluntarily curtailed during the 4-day January 2024 pricing event?
 - a. If so, please provide that estimate and any relevant support.

Response:

1. As part of the Winter Storm Uri-related proceedings, Xcel Energy developed a protocol for notifying customers of significant increases in spot market natural gas prices. At a minimum, communications are initiated when NSPM's estimated average price for all spot or swing gas purchased for the day (or weekend) ahead is greater than or equal to five times the cost of gas forecast for the month at issue in the Gas Utility's filed PGA for that month. The Company may also initiate customer communications where it believes it would be beneficial to notify customers even if prices are expected to be below such threshold.

The communications aim to raise awareness of the price increase and to provide energy conservation tips for customers who choose to decrease their energy usage in response. Messaging is shared through emails to natural gas customers, a news release, social media, xcelenergy.com, Customer Care phone line messages, and automated phone calls to commercial and industrial customers. Information is also shared with employees who conduct outreach to stakeholders, customers, and others.

Most recently, the Company's communications to customers related to spot market natural gas price increases were activated on Friday, January 12, 2024,

when wholesale natural gas prices increased ahead of the Martin Luther King Jr. holiday weekend.

When spot market natural gas prices increased above the price trigger on January 12, 2024, the Company initiated its planned conserving messaging to customers the same day. The communications explained that extreme cold across much of the U.S. had led to increased wholesale natural gas prices, and those costs are ultimately paid by customers. Communications noted that higher natural gas prices would last a few days, encouraged customers to consider conserving during that time, and provided energy-savings tips for customers so they could conserve if they chose to do so.

In addition to these communications activated by significant increases in natural gas prices, throughout the winter, the Company frequently provides messaging to customers about conservation. This includes using social media to encourage customers to follow easy tips to save energy during the cold season, as well as sharing safety and winter weather readiness messages through both social media and media.

2. Please see the Company's August 1, 2024 Annual Report in Docket Nos. G999/CI-21-135 and G002/CI-21-610, pages 15-16 for a discussion of Conservation Calls, and customer responses.

Preparer:	Matt Laible (part 1)	Justin Holstein (part 2)
Title:	Director, Jurisdictional Comm.	Manager, Gas Resource Planning
Department:	Strategic Communications	Gas Planning
Telephone:	612-337-2394	303-571-2750
Date:	November 7 2024	

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Date Received: August 8, 2024

Question:

Reference: Xcel Energy's August 1, 2024 Compliance Filing in Docket No. G-999/CI-21-135

- C. If the response to part B above is negative, explain why it was prudent for the utility to not call a curtailment order in light of the facts known at the time during the period of January 11 through January 18, 2024.

Response:

2. Interruptible customers in North Dakota and our service areas immediately adjacent to North Dakota (East Grand Forks, Moorhead, etc.) were released from the event at 6 p.m. on January 15, 2024. All

remaining interruptible customers were released on January 17, 2024 at 9 a.m.

3. The Company requested curtailments from a total of 327 interruptible customers. Eighty-four customers in North Dakota and bordering areas, and 243 customers in the rest of the service territory.
4. 283 of the 327 interruptible customers “complied” with the order. This is calculated based on the 44 customers who were charged penalties for unauthorized usage. Total unauthorized gas use was 4,751 Dth. The Company notes that the presence of a penalty (here used to indicate non-compliance) is a blunt measurement and may not capture, for instance, if a customer was late shutting off gas but otherwise fully complied for the duration of the event.
5. Since we did not plan to purchase gas for interruptible customers, we do not have a record of avoided purchases on these days. Going into the holiday weekend, the Company was projecting a peak load of 803,426 Dth (including all classes) on Sunday, January 14, 2024. This projected load was above our firm upstream transportation rights, consistent with our expectations given the forecasted weather. It is impractical to purchase and/or withdraw from storage more gas than our transportation rights during these conditions, as the gas will likely not move to market. In these situations, we buy gas to match our upstream transportation rights less planned storage withdrawal. As a result, we called a curtailment of our interruptible customers and expected the dispatch of our peak shaving facilities to ensure reliable service to firm customers.

C. Not Applicable.

Preparer:	Jon Gill	Justin Holstein (B5)
Title:	Sr. CIP DSM Load Mgmt Analyst	Manager
Department:	Demand Management	Gas Planning
Telephone:	605-339-8202	303-571-2750
Date:	August 20, 2024	

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Xcel Energy Information Request No. 72
Docket No.: G002/M-21-610
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: October 31, 2024

Question:

Topic: Interruptible Curtailment
Reference(s): Annual Compliance Filing, Exhibit 2, page 4 of 15

1. What was the potential interruptible load each day on January 13, 14, 15 and 16, 2024 for Xcel's Minnesota interruptible customers?
2. What was the actual interruptible load each day on January 13, 14, 15 and 16, 2024 for Xcel's Minnesota interruptible customers?
3. What percentage of Xcel's Minnesota interruptible customers load was curtailed on January 13, 14, 15 and 16, 2024?

Response:

Please see the below table.

MN Customers Only				
	MSP Temperature	Estimated Curtable Qty (Dth)	Penalty Qty (not Curtailed) (Dth)	% Curtailed
1/13/2024	5.25	27,528	9,893	64.06%
1/14/2024	-3.75	30,008	16,502	45.01%
1/15/2024	-3.25	31,391	11,504	63.35%
1/16/2024	1.63	30,037	9,614	67.99%
Total		118,964	47,513	

Preparer: Justin Holstein
Title: Manager, Gas Resource Planning
Department: Gas Planning
Telephone: 303-571-2750
Date: November 7, 2024

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Xcel Energy Information Request No. 82
Docket No.: G002/M-21-610
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: October 31, 2024

Question:

Topic: Winter Storm Uri Stress Test
Reference(s): Docket No. G999/CI-23-117 CUB Integrated Resource Planning
Proposal, filed October 24, 2023, at page 33.

In the filing listed, the Citizens Utilities Board recommended that the Gas Utilities stress test the resource portfolios performance and costs with, at a minimum, the following condition;

1. A winter storm screening: an analysis that tests portfolios during the conditions and gas prices similar to those experienced during Winter Storm Uri.
2. Please provide an analysis that tests the Company's January 2024 portfolio using the conditions and gas prices like those experienced during Winter Storm Uri.

Response:

The recommendation referenced above is not a part of the Company's gas resource planning processes, the parameters of the "stress test" are not defined, and the Company has not developed tools for conducting such a test. As a result, the Company is unable to provide the requested information at this time.

Preparer: Justin Holstein
Title: Manager, Gas Resource Planning
Department: Gas Planning
Telephone: 303-571-2750
Date: November 7, 2024

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Xcel Energy Information Request No. 85
Docket No.: G002/M-21-610
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: October 31, 2024

Question:

Topic: Gas Costs during January 13-16 Pricing Event
Reference(s): **TRADE SECRET VERSION** of the January 26, 2024,
Compliance Filing, at page 2

1. Please provide support for the average price of [**TRADE SECRET BEGINS**
TRADE SECRET ENDS].
2. The Company states in the ACT that the pricing event lasted four days.
 - a. Is the correct interpretation of that statement that gas prices were spiking on January 13, 14, 15 and 26, 2024?
3. Please provide support for the [**TRADE SECRET BEGINS**
TRADE SECRET ENDS] million for purchases made in the daily gas market over the 4-day period by day.
4. Please provide support for the total of [**TRADE SECRET BEGINS**
TRADE SECRET ENDS] Dth. for purchases made in the daily gas market over the 4-day period by day.
5. Please complete the table on the following page:

Supply Volume per Dth	12-Feb	13-Feb	14-Feb	15-Feb	16-Feb	17-Feb
Baseload	-	-	-	-	-	-
Daily Spot	-	-	-	-	-	-
Firm Swing	-	-	-	-	-	-
Storage	-	-	-	-	-	-
Peaking - LNG & Propane	-	-	-	-	-	-
Est. Total Supply (Dth./day)	-	-	-	-	-	-
Supply Cost \$ per Dth	12-Feb	13-Feb	14-Feb	15-Feb	16-Feb	17-Feb
Baseload	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Daily Spot	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Firm Swing	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Storage	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Peaking - LNG & Propane	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost (\$/day)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Forecasted Degree Days	0	0	0	0	0	0
Actual Degree Days	0	0	0	0	0	0

Response:

For Parts 1, 3 and 4 above, please see the table below.

Date	1/13/2024	1/14/2024	1/15/2024	1/16/2024	Total
	[PROTECTED DATA BEGINS]				
Daily Spot/Peaking Volumes					
Spot/Peaking Gas Costs					
Spot/Peaking Gas Costs \$/Dth					
				PROTECTED DATA ENDS]	

For Part 2 above, yes, the pricing event where gas prices spiked lasted four days from January 13-16, 2024 inclusive (January “26” should be “16” in the question above).

For Part 5, please see the table below. The Forecasted Degree Days and Actual Degree Days in the table below are calculated as the heating degree days based on the average of the 24 hourly forecasted and actual temperatures experienced during January 13-16. The forecasted temperatures were those forecasted on Friday morning, January 12 for the following four days. Since the daily gas market trades on Friday for all days of the weekend including holiday weekends, the Friday morning forecast was used as the basis for buying spot and peaking gas supplies for January 13-16.

Supply Volume in Dth	1/13/2024	1/14/2024	1/15/2024	1/16/2024	Total
	[PROTECTED DATA BEGINS]				
Baseload					
Daily Spot					
Firm Swing - Peaking					
Storage Withdrawals					
Peaking - LNG/Propane					
Total Supply in Dth					
				PROTECTED DATA ENDS]	
Supply Cost	1/13/2024	1/14/2024	1/15/2024	1/16/2024	Total
	[PROTECTED DATA BEGINS]				
Baseload					
Daily Spot					
Firm Swing - Peaking					
Storage Withdrawals					
Peaking - LNG/Propane					
Total Supply Cost					
				PROTECTED DATA ENDS]	
Supply Cost per Dth	1/13/2024	1/14/2024	1/15/2024	1/16/2024	Total
	[PROTECTED DATA BEGINS]				
Baseload					
Daily Spot					
Firm Swing - Peaking					
Storage Withdrawals					
Peaking - LNG/Propane					
Total Supply Cost \$/Dth					
				PROTECTED DATA ENDS]	
Forecasted Degree Days	61	70	69	62	
Actual Degree Days	67	69	66	61	

Portions of this response are marked “Non-Public” as they contain information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). The information derives independent economic value from not being generally known or readily ascertainable by others who could obtain a financial advantage from their use. Thus, Xcel Energy maintains this information as a trade secret pursuant to Minn. Rule 7829.0500.

Preparer: Jeff Unrau
Title: Sr. Gas Resource Planning Analyst
Department: Gas Supply and Planning
Telephone: 303-571-7344
Date: November 7, 2024

☒ Public Document

Date Received: October 31, 2024

Question:

Topic: Extraordinary Gas Cost Recovery

Reference(s): Quarterly Compliance and Tracking Filing, filed September 27, 2024

- c. If not, please provide an estimate of the additional amount of time that would be required to recover the full amount.

Response:

- a. The Company showed an under-recovery of \$42,572,552 as of the end of August 2024, per the tracker filed September 27, 2024 in this docket. Of this total, \$4,666,143 related to the under-recovery of the expenses for the non-Residential classes at the end of the 27-month recovery period. Order point 5 of the October 19, 2022 Commission Order in this docket states that “Xcel shall incorporate any remaining true-up into its next annual automatic

adjustment report following the 27-month and 63-month recovery periods.” We included this \$4.7 million in our September 3, 2024 Annual Purchased Gas Adjustment (PGA) True-up Filing (Docket No. G002/AA-24-304). This \$4.7 million is being recovered as part of the monthly PGA true-up factors in place from September 2024 through August 2025.

For the remaining \$37.9 million under-recovery, the Company is currently forecasting to be approximately \$764,000 under-recovered as of December 31, 2026 (the end of the 63-month recovery period).

- b. Not-applicable
- c. Per order point 5 of the October 19, 2022 Commission Order in this docket (as shown in part a to this response), the Company plans to incorporate the recovery balance from the 63-month recovery period into the PGA True-up Filing due September 1, 2027. The balance will be included in the PGA true-up factor in place from September 1, 2027 through August 31, 2028.

Preparer: Lisa Peterson
Title: Director, Regulatory Pricing and Analysis
Department: Regulatory Affairs
Telephone: 612-330-7681
Date: November 7, 2024

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Public Comments**

Docket No. G999/CI-21-135and G002/CI-21-610

Dated this 3rd day of **December 2024**

/s/Sharon Ferguson

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37	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
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39	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-135Official Service List
40	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General -	Bremer Tower, Suite 1400	Electronic Service		No	21-135Official

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42	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-135Official Service List
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47	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-135Official Service List
48	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-135Official Service List
49	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-135Official Service List
50	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	21-135Official Service List
51	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	21-135Official Service List
52	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
53	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney	Suite 1400 445	Electronic Service		No	21-135Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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55	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	21-135Official Service List
56	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	21-135Official Service List
57	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-135Official Service List
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60	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-135Official Service List
61	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List
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63	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-135Official Service List
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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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68	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-135Official Service List

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6	Barbara	Case	barbara.case@state.mn.us		Office of Administrative Hearings	600 N. Robert St. St. Paul MN, 55101 United States	Electronic Service		No	21-610Official Service List
7	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	21-610Official Service List
8	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-610Official Service List
9	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	21-610Official Service List
10	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21-610Official Service List
11	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	21-610Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
12	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-610Official Service List
13	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		Yes	21-610Official Service List
14	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-610Official Service List
15	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-610Official Service List
16	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	21-610Official Service List
17	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-610Official Service List
18	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	21-610Official Service List
19	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	21-610Official Service List
20	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-610Official Service List
21	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-610Official Service List
22	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN,	Electronic Service		No	21-610Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55164 United States				
23	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-610Official Service List
24	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		Yes	21-610Official Service List
25	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	21-610Official Service List
26	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstein, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-610Official Service List
27	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	21-610Official Service List
28	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-610Official Service List
29	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	21-610Official Service List
30	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	21-610Official Service List
31	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-610Official Service List
32	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-610Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
33	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-610Official Service List
34	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-610Official Service List
35	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	21-610Official Service List
36	Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts		700 K St NW Washington DC, 20001 United States	Electronic Service		Yes	21-610Official Service List