



November 10, 2021

VIA ELECTRONIC FILING

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

RE: In the Matter of the Petition Approval of Deferrals Related to Depreciation, Distribution O&M, and Property Tax For 2022

Docket No. G-002/M-21-750

Dear Mr. Seuffert:

Please find the attached Comments of the Energy CENTS Coalition in the above-referenced matter. If you have questions about these comments, please call me at 651-280-7427. Thank you for your consideration.

Sincerely,

Sara Lopez
Associate Director
Energy CENTS Coalition

**State of Minnesota
Before the Public Utilities Commission**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

**In the Matter of Northern States Power Company
d/b/a Xcel Energy's Petition for Approval of Deferrals
Related to Depreciation, Distribution O&M, and Property
Tax for 2022.**

Docket Number: G-002/M-21-750

Comments of the Energy CENTS Coalition

The Energy CENTS Coalition (ECC) appreciates the opportunity to provide comments regarding Xcel Energy's ("Xcel" or "the Company") "stay out" proposal as an alternative to a contested rate case proceeding filed in Docket No. G002/GR-21-678. Previously, ECC has supported similar proposals brought forward by the company, most recently in the electric rate case stay-out approved by the Commission in 2020.¹ Considering the persistent economic effects of the ongoing COVID-19 pandemic and the highly variable levels of financial recovery that consumers have been able to achieve in the past year, ECC believes that maintaining base rates at 2010 approved test year levels would provide relief for ratepayers. Protecting ratepayers from increased natural gas prices is particularly important given the projected increase in the commodity cost of gas and rising prices for food and other essential items.

ECC supports the present stay out proposal brought forward by Xcel Energy, primarily because \$31.6 million in projected incremental depreciation, distribution O&M, and property tax expenses for the year 2022 is deferred. Furthermore, the present stay out proposal will provide stakeholders with the opportunity to closely examine the actual expenditures (incremental depreciation, distribution O&M, and property tax expenses for the year 2022) incurred by Xcel in the next rate case. Residential ratepayers, particularly lower-income ratepayers, are experiencing economic hardship caused by the pandemic and

¹ Docket Nos. E002/GR-20-723, E002/M-20-743.

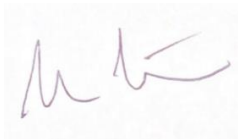
most Xcel Energy residential customers are currently paying for the costs of the February 2021 natural gas price spike. In addition, “nearly half of U.S. households that heat primarily with natural gas will spend 30 percent more than they spent last winter on average -50 percent more if the winter is 10 percent colder-than-average and 22 percent more if the winter is 10 percent warmer-than-average.”²

Finally, as of September 2021, 13.4 percent of Xcel residential customers are past-due, the highest monthly number reported in 2021. The average past due amount is \$471.³ Adding an 8.6 percent natural gas rate increase will worsen households’ current financial strain.

ECC respectfully requests, therefore, the Commission approve the Company’s deferral proposal.

Respectfully submitted,

Date: November 10, 2021

A handwritten signature in purple ink, appearing to read 'Sara Lopez', is positioned above the contact information.

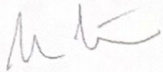
Sara Lopez
Energy CENTS Coalition
823 Seventh St.
St. Paul, MN 55106
sara@energycents.org
651-280-7427

² U.S. Energy Information Administration, Short-Term Energy Outlook, October 13, 2021.

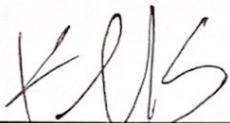
³ Xcel Energy Monthly Compliance Report, September 2021, Docket #20-375.

AFFIDAVIT OF SERVICE

Sara Lopez certifies that on the 10th day of November 2021, she served, by electronic filing, Comments on behalf of the Energy CENTS Coalition in the Matter of Northern States Power Company d/b/a Xcel Energy's Petition for Approval of Deferrals Related to Depreciation, Distribution O&M, and Property Tax for 2022, DOCKET NO: G-002/M-21-750, to the individuals on the attached service list.

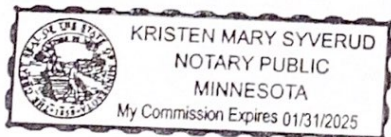


Sara Lopez



Kristen Syverud

Subscribed and sworn to before me
this 10th day of November 2021



Notary Public

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_21-750_M-21-750
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-750_M-21-750
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-750_M-21-750
Robert S.	Carney, Jr.			4232 Colfax Ave. S. Minneapolis, MN 55409	Paper Service	No	OFF_SL_21-750_M-21-750
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_21-750_M-21-750
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-750_M-21-750
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-750_M-21-750
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-750_M-21-750
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-750_M-21-750
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-750_M-21-750

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-750_M-21-750
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_21-750_M-21-750
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-750_M-21-750
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-750_M-21-750
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-750_M-21-750
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-750_M-21-750
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-750_M-21-750

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Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-750_M-21-750
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-750_M-21-750
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-750_M-21-750
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David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-750_M-21-750
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-750_M-21-750
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-750_M-21-750
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-750_M-21-750
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-750_M-21-750

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-750_M-21-750
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-750_M-21-750
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-750_M-21-750