



414 Nicollet Mall
Minneapolis, MN 55401

November 21, 2024

—Via Electronic Filing—

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

RE: PETITION
GAS AFFORDABILITY PROGRAM TRACKER BALANCE PROPOSAL
DOCKET NO. G002/M-24-____

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this filing regarding the Gas Affordability Program Tracker Balance in compliance with Order Point 13 in the Minnesota Public Utilities Commission's January 18, 2023 Order in Docket No. G002/M-22-257.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service lists.

Please contact Jennifer Roesler at jennifer.roesler@xcelenergy.com or me at nicholas.f.martin@xcelenergy.com or (612) 330-6255 if you have any questions regarding this filing.

Sincerely,

/s/

NICHOLAS MARTIN
DIRECTOR, STRATEGIC OUTREACH & ADVOCACY

Enclosures
cc: Service Lists

REQUIRED INFORMATION

I. SUMMARY OF FILING

A one-paragraph summary is attached to this filing pursuant to Minn. Rule 7829.1300, subp. 1.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Commission. Pursuant to Minn. Rule 7829.1300, subp. 2, the Company has served a copy of this filing on the Department of Commerce and the Office of the Attorney General. A summary of the filing has been served on all parties on Xcel Energy's miscellaneous gas service list and the service list for Docket No. G002/M-22-257.

III. GENERAL FILING INFORMATION

Pursuant to Minn. Rule 7829.1300, subp. 3, the Company provides the following information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company doing business as:
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Lauren Steinhäuser
Assistant General Counsel
Xcel Energy
414 Nicollet Mall, 401 – 8th Floor
Minneapolis, MN 55401
612-216-8274

C. Date of Filing and Proposed Effective Date of Rates

The date of this filing is November 21, 2024. The Company proposed the new rate be effective February 1, 2025.

REQUIRED INFORMATION

D. Statute Controlling Schedule for Processing the Filing

Minn. Stat. § 216B.16, subd. 1 prescribes general timelines for rate and tariff changes, including, but not limited to, a requirement of 60-days' notice prior to any rate or tariff change.

Commission Rules define this filing as a "miscellaneous filing" under Minn. Rule 7829.0100, subp. 11 since no determination of Xcel Energy's overall revenue requirement is necessary. Minn. Rule 7829.1400, subp. 1 and 4 permit comments in response to a miscellaneous filing to be filed within 30 days and reply comments to be filed no later than 10 days thereafter.

E. Utility Employee Responsible for Filing

Nicholas Martin
Director, Strategic Outreach & Advocacy
Xcel Energy
414 Nicollet Mall, 401 – 7th Floor
Minneapolis, MN 55401
612-330-6255

IV. MISCELLANEOUS INFORMATION

Pursuant to Minn. Rule 7829.0700, the Company requests that the following persons be placed on the Commission's official service list for this proceeding:

Lauren Steinhäuser
Assistant General Counsel
Xcel Energy
414 Nicollet Mall, 401 – 8th Floor
Minneapolis, MN 55401
lauren.steinhäuser@xcelenergy.com

Christine Schwartz
Regulatory Administrator
Xcel Energy
414 Nicollet Mall, 401 – 7th Floor
Minneapolis, MN 55401
regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to Ms. Schwartz at the Regulatory Records email address above.

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF NORTHERN STATES
POWER COMPANY'S GAS AFFORDABILITY
PROGRAM (GAP) TRACKER BALANCE AND
PROPOSAL TO INCREASE ITS ANNUAL GAP
FUNDING LEVEL AND SURCHARGE

DOCKET NO. G002/M-24-____

PETITION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Petition regarding our Gas Affordability Program (GAP or the Program) funding level and tracker balance, in compliance with Order Point 13 of the Commission's January 18, 2023 Order in Docket No. G002/M-22-257 (January 18 Order).

That Order Point requires the Company to monitor monthly spending from and income to the GAP. If the Program is on track to deplete its tracker balance within six months, the Company is required to make a filing that includes, at a minimum: (1) tracker balance, income, and spending on a monthly basis for the previous six months and projected six months into the future, (2) an evaluation of possible modifications to avoid closure of the program, including modifying the affordability benefit and arrearage forgiveness benefit amounts for participants, changing the program funding level/surcharge, and other options the Company has considered, and (3) a proposal to avoid the projected negative tracker balance.

The GAP tracker balance is currently projected to be depleted in August 2025. While this is greater than the six months noted in Order Point 13 of the January 18 Order, we submit the filing now in order to implement a new rate, if approved, starting February 1, 2025. This would include some winter months when greater volumetric sales would be expected to help replenish the tracker balance. Delaying the implementation of a new rate to later in 2025 would necessitate a larger increase in the surcharge to avoid

depletion in August 2025. If the Commission approves the proposed surcharge rate, the estimated surcharge for a typical residential customer will increase by \$3.87 annually or \$0.32 monthly. We are forecasting the average monthly credit for participating customers to be \$36.

The Company provides in this filing the required tracker balance reporting and evaluation of modifications to avoid closure of the Program. Our proposal to increase the surcharge is necessitated by the success of the program in doubling of the number of customers receiving GAP assistance since the beginning of 2023. After evaluating possible modifications to the program design, the Company proposes to increase the current surcharge from \$0.00445 per therm to \$0.00875 per therm, effective February 1, 2025, to avoid the projected negative tracker balance and to keep the Program funded through 2025 and beyond. This will be our first increase to the monthly surcharge since 2017. In addition, we propose to increase the total Program budget from \$2.5 million to \$5.6 million to sustain the Program going forward.

I. BACKGROUND AND PAST ORDERS

GAP is designed to lower the percentage of income that low-income households use to pay current gas bills (referred to in this filing as “gas energy burden”), increase the number of customer payments, and provide a mechanism to assist customers in paying off arrearage balances. The Company partners with Energy CENTS Coalition (ECC) on outreach and administration of the Program.

We first proposed our Program in November 2006 in our natural gas general rate case in compliance with Minn. Stat. § 216B.16, subd. 15. The GAP was approved by the Commission in the September 10, 2007 Order in Docket No. G002/GR-06-1429, and the Program was implemented on February 1, 2008 in conjunction with final rates. That same Order set the Program budget at \$2.5 million annually, as the Company had proposed. The Program design has been updated several times, including adjustments to the surcharge to levelize the tracker balance, while keeping the overall Program budget consistent since it was originally approved.

In December 2009, we reduced the gas energy burden threshold to qualify for GAP from six to four percent, in accordance with the Commission’s November 18, 2009 Order in Docket No. G002/GR-06-1429. This allowed the Company to provide benefits to more customers.

The Commission’s January 20, 2012 Order in Docket No. G002/GR-06-1429 approved the use of excess tracker funds to supplement benefits in that year unless

otherwise ordered by the Commission, and we updated our GAP tariff to specifically allow for use of excess tracker funds in future Program years.

In its October 26, 2012 Order in Docket No. G002/GR-06-1429, the Commission approved a reduction in the GAP surcharge from \$0.00445 per therm to \$0.00400 per therm, effective January 1, 2013, to reduce the excess GAP tracker balance.

The Commission's May 22, 2017 Order (2017 Order) in Docket No. G002/M-16-493, regarding our four-year Evaluation Report, approved our request to return the monthly GAP surcharge to its former level of \$0.00445 per therm, since the tracker balance surplus had been sufficiently reduced. The monthly surcharge has remained at the \$0.00445 rate since the 2017 Order.

On October 1, 2021, the Company reduced the gas energy burden threshold of our Program a second time, this time from four to three percent, as approved by the Commission's September 15, 2021 Order in Docket No. G002/M-21-220. This change allowed the Company to provide benefits to more customers and to continue our efforts to reduce the tracker balance.

The Commission's January 18, 2023 Order in Docket No. G002/M-22-257 required the Company to develop an automatic enrollment process to place all customers that are Low Income Home Energy Assistance Program (LIHEAP) recipients on the GAP. In its April 19, 2023 Order in that same docket, the Commission accepted our auto-enrollment process and associated tariff modifications. We began auto-enrollment of all LIHEAP customers in the GAP on July 15, 2023. As we stated in our last Annual Report in Docket No. G002/M-24-36, GAP disbursements in 2023 increased from 2022, which was a direct result of the auto-enrollment process.

We submit this Petition to adjust both the Program surcharge and the Program budget in compliance with the January 18 Order. Our proposal will support the continued success of the Program as we have begun to provide benefits to more customers resulting from recent Program modifications approved by the Commission. As described further below, our proposal to increase the surcharge is necessitated by a doubling of the number of customers receiving GAP assistance since the beginning of 2023.

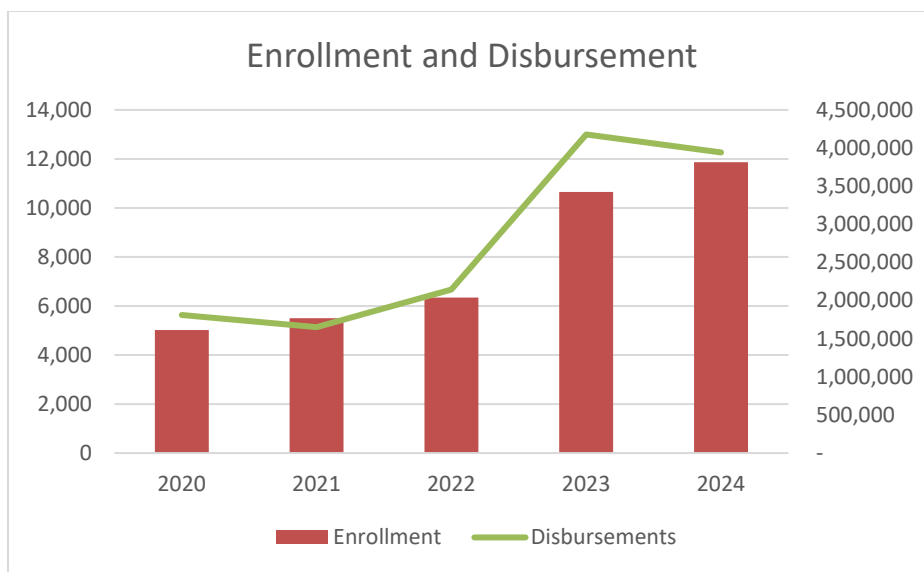
II. TRACKER BALANCE, INCOME, AND SPENDING

GAP spending for a given year is the product of several variables, including the differences between expected and actual natural gas bills (often driven by variances in usage, which can be caused by changes in the weather), the wholesale price of natural

gas, the arrearage level of GAP participants, and participants' LIHEAP participation rates. In practice, it is often not possible to maintain a target tracker balance given the variability in both spending and collections inherent in a volumetric rate, combined with factors outside the Company's control including weather, natural gas pricing, and broader economic challenges that affect the number of participants needing assistance.

The Company continually monitors monthly spending from and income to the GAP. Our evaluation of the forecast shows the tracker balance will be depleted by August of 2025. Auto-enrollment has led to increased Program benefits for more customers, resulting in a high Program participation rate and higher benefit disbursements, with a tracker balance that is expected to run a deficit by the middle of next year. Figure 1 below illustrates how both enrollment and disbursement have approximately doubled in the past two years (2024 values represent actuals through October and forecasts for November and December).

Figure 1



Attachments 1 and 2 show the tracker balance, income, spending, participants and administrative costs on a monthly basis for 2024 and 2025. The attachments show actuals through October 2024 and forecasts for November 2024 through December 2025. Attachment 1 depicts the status quo: no change to the GAP surcharge, which results in a predicted negative tracker balance in August 2025. Attachment 2 portrays implementation of the new surcharge proposed in this filing starting February 1, 2025, which avoids a negative tracker balance in 2025.¹

¹ Note that the tracker balance lines of Attachments 1 and 2 depict a negative balance as liability to the Company, which is the same as a positive balance within the Program. This is identical to the format of our annual reports.

The main driver of the substantial increase in GAP disbursements in 2023 and 2024 is the large increase in customers participating in the Program, primarily due to auto-enrollment beginning in July 2023. The Program has more than doubled in participants since the beginning of last year. While auto-enrollment increases participation and therefore costs, it also indicates the Company has been successful in reaching more customers who need assistance, an area in which the Company had not had significant success prior to 2023.

For broader perspective on this enrollment question, in the Company's outreach to community-based organizations and low-income advocates, we frequently hear the message that many more customers are eligible for, and in need of, assistance than are receiving it. We have also heard a consistent message that the Company should do what we can to lower barriers to enrollment in order to increase participation in our affordability programs. This was in particular a theme of our discussions with the Equity Stakeholder Advisory Group in 2022-2024.² Auto-enrollment is one important mechanism: once a customer has gone through the LIHEAP enrollment process, auto-enrollment removes the requirement for a separate application for the GAP. The marked increase in GAP participants – from about 6,400 households at the start of 2023 to 11,868 as of October 2024, an 85 percent increase – in part reflects this success. As the program participants have grown in number, GAP costs and disbursements have also increased, necessitating this filing.

III. PROPOSAL TO AVOID PROJECTED NEGATIVE TRACKER BALANCE

A. Program Surcharge

As a result of the forecasted deficit of funds, and in order to continue to reach the same customers currently benefiting from the GAP, the Company proposes to increase its current surcharge from \$0.00445 per therm to \$0.00875 per therm, an increase of \$0.00430, effective February 1, 2025 to avoid the projected negative tracker balance. The rate has been calculated to apply to all Residential customers, Commercial Demand Billed Service customers, and Commercial Firm Service customers. We are forecasting the average monthly credit for participating customers to be \$36.

² See *In the Matter of Efforts to Advance Workforce Diversity, Inclusive Participation, and Equitable Access to Utility Services for Xcel Energy*, Docket Nos. E002/M-22-266 and E002/RP-19-368 2023 ANNUAL REPORT (December 29, 2023). See also *In the Matter of Xcel Energy's Petition for an Automatic Bill Credit Pilot*, Docket No. E002/M-24-173, PETITION (April 23, 2024).

We have calculated the rate to begin in February 2025 in order to begin higher collections during some of the winter months that have higher volumetric gas sales. If the surcharge rate is not implemented to capture some of these winter months, the rate would need to be higher in order to collect the necessary amount to keep the tracker funded. This timing issue is discussed further in section IV.

Attachment 2 shows the calculation of the proposed increase of GAP funding and the resulting proposed GAP surcharge of \$0.00875 per therm. If the Commission approves the proposed surcharge rate, the estimated surcharge for a typical residential customer will increase from \$4.01 to \$7.88 annually.

B. Annual Program Funding

In order to maintain funding for the Program going forward to account for the increased enrollment, an increase to the overall Program budget is also needed. In 2023, we did not yet have a full calendar year to evaluate the impact of auto-enrollment. Now that more time has passed and we have additional data, we are able to provide a more complete analysis of the impact of increased enrollment on Program spend. That analysis shows that the success of the auto-enrollment Program and resulting increased disbursements now requires more Program funding.

As discussed above, the Program budget has been \$2.5 million dating back to the Program's start in 2006. For many years, the Company experienced low enrollment and therefore had a higher tracker balance than we had expected when designing the Program and setting the Program budget. The doubling of participation following auto-enrollment has succeeded in reducing the tracker balance to the point where we expect it to be depleted. We have therefore calculated a new Program budget to be \$5.6 million in order to provide the same level of benefits to qualified customers through the Program.

IV. EVALUATION OF POSSIBLE MODIFICATIONS TO AVOID CLOSURE OF THE PROGRAM

After identifying that the GAP tracker balance was on track for depletion, we evaluated possible Program modifications to avoid closure of the program, including modifying the gas energy burden threshold for eligibility and increasing the surcharge.

The Company first considered the impact of modifying the gas energy burden threshold from its current three percent to four percent, as it was prior to late 2021. For context, it is helpful to understand the impact of changing the gas energy burden threshold to its current level in 2021. With the late 2021 decrease to the threshold, we saw a six percent

increase in benefits to households compared to 2020 (September through December 2021). The 2021 change allowed customers with a lower gas energy burden to qualify for the Program. This change took effect only two years ago and was an effort to assist more families that were struggling to pay their bills. At that time, we also had a surplus in our GAP tracker balance and were looking at ways to increase participation which would reduce the tracker balance. Ultimately, while the change did allow us to reach new customers, it did not increase overall program participation and therefore did not reduce the tracker balance.³

As it became apparent in October 2024 that we needed to make adjustments to Program funding, the Company partnered with ECC to determine the impact of increasing the gas energy burden threshold level from three percent back to four percent. This would reduce Program disbursements, and thus the surcharge rate needed to keep the tracker balance positive, but fewer households would be eligible for assistance. Returning the gas energy burden threshold to four percent would result, we estimate, in 2,230 households who would no longer be eligible for an affordability credit. This scenario would also reduce the affordability benefit paid to those who remain eligible for assistance. Together, this would be a hardship for many income-qualified families currently in the Program.

If we reinstate the four percent gas energy burden threshold, the necessary increase in the surcharge to avoid a negative tracker balance would be smaller: \$0.00722 per therm, compared to our proposed \$0.00875 per therm. As a result, the average non-participant residential customer would realize a savings of \$1.38 per year, or approximately \$0.12 per month (with actual savings varying by month). While this alternative would save non-participants a very small amount per month, it would remove assistance for 2,230 households as well as reduce the benefits paid to households that remain in the Program.

The Company also looked at how to accommodate the current level of participants. In order to serve the number of customers now enrolled in the GAP, we would need to increase the overall budget of the program. We would do this by increasing the surcharge rate sufficiently to maintain credits at the current participation level.

Table 1 below summarizes the two scenarios the Company analyzed. The first option is increasing the surcharge to accommodate the current level of participants. The second option is implementing a smaller surcharge increase while increasing the gas energy

³ We noted in our annual report that this was attributed, at least in part, to impacts of the pandemic. *See* Docket No. G002/M-22-152.

burden threshold for eligibility to four percent, resulting in both a decrease in benefits paid out and fewer households served by the Program.

Table 1
Scenario Impacts

Scenario	Participating Customers	Participating Customer Benefit	Cost to Typical Non-Participating Customers
Surcharge increase and current (3%) gas energy burden threshold	18,000 households served at peak Change: No change	No change	Cost of \$7.88 annually (\$0.66 per month) Change: Increase of \$3.87 annually (\$0.32 per month)
Smaller surcharge increase and increase gas energy burden threshold to 4%	15,770 customers served at peak Change: 2,230 fewer households served at peak	Average reduction of \$10 per month	Cost of \$6.50 annually (\$0.54 per month) Change: Increase of \$2.49 annually (\$0.21 per month)

The Company also considered the timing of this proposal during our analysis. We are submitting the filing now in order to implement a new surcharge rate February 1, 2025 so that the surcharge will be in effect during winter months with greater volumetric gas sales. Delaying the implementation of a new rate later in the year would necessitate a significantly higher surcharge rate to keep the tracker balance positive. For example, if the Company delayed this filing to six months prior to depletion of the tracker, we estimate that a new surcharge rate could go into effect no sooner than April 1. At that time, gas volumetric sales would be significantly lower in the spring and summer months, and in order to collect sufficient funds to keep the Program funded, the surcharge per therm would therefore need to be significantly higher – at least \$0.012 per therm, or an approximately 170 percent increase from the current surcharge. This would not only have a more dramatic impact on non-participants’ bills, but the higher surcharge would also over-collect once volumetric sales increased again the following winter, collecting approximately \$8 million on an annual basis – \$2.4 million greater than our current forecast. The surcharge would then need to be reduced again in 2026 to avoid a tracker surplus. Rather than this dramatic fluctuation between shortfall and surplus, we propose to implement a new surcharge in February 2025 at the level currently forecasted to be sufficient to maintain a positive tracker balance.

V. PROPOSED TARIFF REVISION AND CUSTOMER NOTICE

Attachment 3 includes the proposed update to the Company’s Gas Affordability Program Tariff in its Minnesota Gas Rate Book, Sheet No. 5-69. We update both the GAP surcharge and the annual Program cost.

The Company proposes to provide the following message to customers as a notice on their February 2025 gas bills:

Effective February 1, 2025, the Gas Affordability line item on your bill, which provides energy assistance as part of our Affordability programs, has increased from \$0.00445 to \$0.00875 per therm.

Consistent with past practice, we will work with the Department of Commerce and the Consumer Affairs Office regarding our proposed customer notice.

VI. REPORTING

The Company's next Annual Report is due at end of March 2025. Considering this is only a short time after our proposed implementation of the new surcharge rate, the Company will not have much actual data by the time of the Annual Report to provide significant analysis at the new rate. We will provide as much supporting detail in our Annual Report as we are able at that time. The Company will provide a full analysis in the Annual Report to be filed in March 2026.

CONCLUSION

Xcel Energy respectfully requests the Commission approve our proposed Gas Affordability Program surcharge increase and overall Program budget increase to ensure the Program continues uninterrupted and maintains the current benefit to customers who currently qualify for the Program.

Dated: November 21, 2024

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF NORTHERN STATES
POWER COMPANY'S GAS AFFORDABILITY
PROGRAM TRACKER BALANCE AND
PROPOSAL TO INCREASE ITS 2025 GAP
FUNDING LEVEL AND SURCHARGE

DOCKET NO. G002/M-24-____

PETITION

SUMMARY OF FILING

Please take notice that on November 21, 2024, Northern States Power Company doing business as Xcel Energy filed with the Minnesota Public Utilities Commission a Petition requesting approval to increase its Gas Affordability Program (GAP) funding to \$5.6 million annually, and increase the GAP surcharge to \$0.00875 per therm.

	2024												Total
	January	February	March	April	May	June	July	August	September	October	November	December	
	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Forecast	Forecast	
Collections	\$ (442,234)	\$ (410,129)	\$ (335,153)	\$ (288,868)	\$ (145,347)	\$ (71,798)	\$ (64,678)	\$ (56,337)	\$ (56,925)	\$ (79,956)	\$ (315,393)	\$ (477,190)	\$ (2,744,009)
Participants	10,296	10,326	10,627	10,881	11,427	11,675	17,043	16,193	13,237	11,868	11,096	10,815	
Disbursements	\$ 323,012	\$ 322,844	\$ 336,624	\$ 368,006	\$ 359,048	\$ 286,468	\$ 348,857	\$ 362,233	\$ 308,341	\$ 334,228	\$ 299,598	\$ 292,003	\$ 3,941,262
Administrative Program Costs	\$ 7,452	\$ 1,348	\$ 79,167	\$ 702	\$ 1,505	\$ 1,837	\$ 1,686	\$ 1,084	\$ 3,650	\$ 1,563	\$ 3,500	\$ 3,500	\$ 106,995

Tracker Balance

Asset/(Liability)¹ \$ (2,697,287) \$ (2,783,224) \$ (2,702,586) \$ (2,622,747) \$ (2,407,541) \$ (2,191,034) \$ (1,905,169) \$ (1,598,189) \$ (1,343,122) \$ (1,087,288) \$ (1,099,583) \$ (1,281,269)

	2025												Total
	January	February	March	April	May	June	July	August	September	October	November	December	
	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	
Collections	\$ (541,843)	\$ (472,503)	\$ (379,104)	\$ (203,788)	\$ (118,113)	\$ (75,701)	\$ (54,847)	\$ (59,322)	\$ (74,142)	\$ (178,296)	\$ (315,393)	\$ (477,190)	\$ (2,950,243)
Participants	10,455	10,486	10,792	11,050	11,604	11,856	18,000	17,102	13,980	13,030	12,183	11,874	
Disbursements	\$ 376,396	\$ 377,493	\$ 388,497	\$ 397,783	\$ 417,743	\$ 426,809	\$ 648,000	\$ 615,682	\$ 503,290	\$ 469,093	\$ 438,588	\$ 427,470	\$ 5,486,844
Administrative Program Costs ²	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 108,000

Tracker Balance

Asset/(Liability)¹ \$ (1,437,716) \$ (1,523,725) \$ (1,505,333) \$ (1,302,339) \$ (993,709) \$ (633,600) \$ (31,448) \$ 533,912 \$ 972,060 \$ 1,271,857 \$ 1,404,052 \$ 1,363,332

¹ Based on 2024 actual and forecast expenses.

² A negative balance is a liability to the Company which is the same as a positive Program balance.

	2024												Total
	January	February	March	April	May	June	July	August	September	October	November	December	
	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Forecast	Forecast	
Collections	\$ (442,234)	\$ (410,129)	\$ (335,153)	\$ (288,868)	\$ (145,347)	\$ (71,798)	\$ (64,678)	\$ (56,337)	\$ (56,925)	\$ (79,956)	\$ (315,393)	\$ (477,190)	\$ (2,744,009)
Participants	10,296	10,326	10,627	10,881	11,427	11,675	17,043	16,193	13,237	11,868	11,096	10,815	
Disbursements	\$ 323,012	\$ 322,844	\$ 336,624	\$ 368,006	\$ 359,048	\$ 286,468	\$ 348,857	\$ 362,233	\$ 308,341	\$ 334,228	\$ 299,598	\$ 292,003	\$ 3,941,262
Administrative Program Costs	\$ 7,452	\$ 1,348	\$ 79,167	\$ 702	\$ 1,505	\$ 1,837	\$ 1,686	\$ 1,084	\$ 3,650	\$ 1,563	\$ 3,500	\$ 3,500	\$ 106,995

Tracker Balance

Asset/(Liability)¹ \$ (2,697,287) \$ (2,783,224) \$ (2,702,586) \$ (2,622,747) \$ (2,407,541) \$ (2,191,034) \$ (1,905,169) \$ (1,598,189) \$ (1,343,122) \$ (1,087,288) \$ (1,099,583) \$ (1,281,269)

	2025												Total
	January	February	March	April	May	June	July	August	September	October	November	December	
	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	
Collections	\$ (541,843)	\$ (929,078)	\$ (745,430)	\$ (400,708)	\$ (232,245)	\$ (148,850)	\$ (107,846)	\$ (116,645)	\$ (145,784)	\$ (350,582)	\$ (620,155)	\$ (938,295)	\$ (5,277,461)
Participants	10,455	10,486	10,792	11,050	11,604	11,856	18,000	17,102	13,980	13,030	12,183	11,874	
Disbursements	\$ 376,396	\$ 377,493	\$ 388,497	\$ 397,783	\$ 417,743	\$ 426,809	\$ 648,000	\$ 615,682	\$ 503,290	\$ 469,093	\$ 438,588	\$ 427,470	\$ 5,486,844
Administrative Program Costs ²	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 9,000	\$ 108,000

Tracker Balance

Asset/(Liability)¹ \$ (1,437,716) \$ (1,980,301) \$ (2,328,234) \$ (2,322,159) \$ (2,127,661) \$ (1,840,702) \$ (1,291,548) \$ (783,511) \$ (417,005) \$ (289,494) \$ (462,061) \$ (963,886)

¹ Based on 2024 actual and forecast expenses.

² A negative balance is a liability to the Company which is the same as a positive Program balance.

Redline

TERMS AND CONDITIONS OF SERVICE

1. Enrollment participation is limited to a first come first served basis until the estimated Rider program dollar cap is reached.
2. Qualified Customer must maintain an active Company account in said customer's name at said customer's permanent primary residence to be eligible for this Rider.
3. Eligible LIHEAP customers that meet program criteria may opt-in to the program at any time during the year. During the annual auto-enrollment period, the Company will mail information on the Rider, a notice of benefits, and invitation to participate in the Rider to targeted current LIHEAP customers whose income and consumption data result in an affordability credit amount. The program Terms and Conditions for participation must be refused by the customer before the close of the enrollment period or the customer will be auto-enrolled in the program.
4. Qualified Customer agrees to notify Company of any changes in address, income level, or household size. Such changes may result in removal from the Rider as they may disqualify a customer from eligibility under the provisions of the Availability section above.
5. If Qualified Customer fails to pay two consecutive monthly payments in full under the Rider, the customer will be terminated from the Rider and will be subject to Company's regular collection practices including the possibility of disconnection.
6. Regardless of arrears balances, Company agrees to maintain service and suspend collection activities to Qualified Customer if the customer remains current with the payment schedule.

PROGRAM COST & COST RECOVERY

1. A tracking mechanism ("Tracker") will be established to provide for collection of actual Rider program costs as compared to the recovery of Rider program costs through rates. Company will track and defer Rider program costs with regulatory approval. The prudence of the Rider costs is subject to a regulatory review. The recovery of these Rider program costs through rates will begin with the implementation of final rates in Docket No. G002/GR-06-1429.
2. Rider program costs shall be recovered as a separate line item on customer billing statements for all customers receiving firm service under the following tariffs: Residential Firm Service, Commercial Firm Service, and Commercial Demand Billed Service. The rate is ~~\$0.004450~~^{0.00875} per therm. Company may petition the Commission to adjust this rate in order to true-up the Rider Program Year balance in the Tracker in its next general rate case.
3. Total Rider costs, which include start-up costs, Affordability component, Arrearage Forgiveness component, and incremental administration costs incurred by Company, shall not exceed ~~\$2.55.6~~ million per year. However, if there is an over-recovered balance in the Tracker in a given year, the over-recovered balance may be used to supplement benefits in that year unless the Minnesota Public Utilities Commission orders otherwise. Company shall make best efforts to limit administrative costs included in the tracker to 5% of the total Rider costs. Administrative costs will include, but are not limited to, the costs to inform customers of the Rider and costs to process and implement enrollments.

(Continued on Sheet No. 5-70)

Date Filed: ~~02-07-23~~¹¹⁻²¹⁻²⁴ By: ~~Christopher B. Clark~~^{Ryan J. Long} Effective Date: ~~04-19-23~~
President, Northern States Power Company, a Minnesota corporation
Docket No. G002/M-~~22-25724-~~ Order Date: ~~04-19-23~~

Clean

TERMS AND CONDITIONS OF SERVICE

1. Enrollment participation is limited to a first come first served basis until the estimated Rider program dollar cap is reached.
2. Qualified Customer must maintain an active Company account in said customer's name at said customer's permanent primary residence to be eligible for this Rider.
3. Eligible LIHEAP customers that meet program criteria may opt-in to the program at any time during the year. During the annual auto-enrollment period, the Company will mail information on the Rider, a notice of benefits, and invitation to participate in the Rider to targeted current LIHEAP customers whose income and consumption data result in an affordability credit amount. The program Terms and Conditions for participation must be refused by the customer before the close of the enrollment period or the customer will be auto-enrolled in the program.
4. Qualified Customer agrees to notify Company of any changes in address, income level, or household size. Such changes may result in removal from the Rider as they may disqualify a customer from eligibility under the provisions of the Availability section above.
5. If Qualified Customer fails to pay two consecutive monthly payments in full under the Rider, the customer will be terminated from the Rider and will be subject to Company's regular collection practices including the possibility of disconnection.
6. Regardless of arrears balances, Company agrees to maintain service and suspend collection activities to Qualified Customer if the customer remains current with the payment schedule.

PROGRAM COST & COST RECOVERY

1. A tracking mechanism ("Tracker") will be established to provide for collection of actual Rider program costs as compared to the recovery of Rider program costs through rates. Company will track and defer Rider program costs with regulatory approval. The prudence of the Rider costs is subject to a regulatory review. The recovery of these Rider program costs through rates will begin with the implementation of final rates in Docket No. G002/GR-06-1429.
2. Rider program costs shall be recovered as a separate line item on customer billing statements for all customers receiving firm service under the following tariffs: Residential Firm Service, Commercial Firm Service, and Commercial Demand Billed Service. The rate is \$0.00875 per therm. Company may petition the Commission to adjust this rate in order to true-up the Rider Program Year balance in the Tracker in its next general rate case. R
3. Total Rider costs, which include start-up costs, Affordability component, Arrearage Forgiveness component, and incremental administration costs incurred by Company, shall not exceed \$5.6 million per year. However, if there is an over-recovered balance in the Tracker in a given year, the over-recovered balance may be used to supplement benefits in that year unless the Minnesota Public Utilities Commission orders otherwise. Company shall make best efforts to limit administrative costs included in the tracker to 5% of the total Rider costs. Administrative costs will include, but are not limited to, the costs to inform customers of the Rider and costs to process and implement enrollments. R

(Continued on Sheet No. 5-70)

Date Filed: 11-21-24

By: Ryan J. Long

Effective Date:

President, Northern States Power Company, a Minnesota corporation

Docket No. G002/M-24-

Order Date:

CERTIFICATE OF SERVICE

I, Joshua DePauw, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET NOS. G002/M-22-257
Xcel Energy Misc. Gas Service List

Dated this 21st day of November 2024

/s/

Joshua DePauw
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	22-257M-22-257
2	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	22-257M-22-257
3	Brandon	Crawford	brandonc@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	22-257M-22-257
4	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	22-257M-22-257
5	Bridget	Dockter	bridget.dockter@xcelenergy.com			null null, null United States	Electronic Service		No	22-257M-22-257
6	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	22-257M-22-257
7	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	22-257M-22-257
8	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St. Paul MN, 55101 United States	Electronic Service		No	22-257M-22-257
9	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	22-257M-22-257
10	Martha	Hoschmiller	martha.e.hoschmiller@xcelenergy.com	Xcel Energy		414 Nicollet Mall 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	22-257M-22-257
11	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	22-257M-22-257
12	Sarah	Johnson Phillips	sphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	22-257M-22-257
13	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	22-257M-22-257

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	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	22-257M-22-257
15	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	22-257M-22-257
16	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	22-257M-22-257
17	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	22-257M-22-257
18	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	22-257M-22-257
19	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	22-257M-22-257
20	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	22-257M-22-257
21	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	22-257M-22-257

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-GasXcel Misc Gas
2	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		No	Northern States Power Company dba Xcel Energy-GasXcel Misc Gas
3	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-GasXcel Misc Gas
4	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	Northern States Power Company dba Xcel Energy-GasXcel Misc Gas
5	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-GasXcel Misc Gas
6	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-GasXcel Misc Gas
7	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-GasXcel Misc Gas
8	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-GasXcel Misc Gas
9	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-GasXcel Misc Gas
10	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy-GasXcel Misc Gas
11	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	Northern States Power Company dba Xcel Energy-

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
										GasXcel Miscl Gas
12	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy- GasXcel Miscl Gas
13	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy- GasXcel Miscl Gas
14	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		No	Northern States Power Company dba Xcel Energy- GasXcel Miscl Gas
15	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401- 1993 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy- GasXcel Miscl Gas
16	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy- GasXcel Miscl Gas
17	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Northern States Power Company dba Xcel Energy- GasXcel Miscl Gas