



85 7th Place East, Suite 500  
St. Paul, Minnesota 55101-2198  
www.commerce.state.mn.us  
651.296.4026 FAX 651.296.1959  
An equal opportunity employer

April 15, 2011

**PUBLIC DOCUMENT**

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

RE: **PUBLIC Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. G002/M-10-1163

Dear Dr. Haar:

Attached are the **PUBLIC Comments** of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Petition of Northern States Power Company, a Minnesota Corporation (Xcel or the Company), for Approval of Changes in Contract Demand Entitlements.

The petition was filed on November 1, 2010. The petitioner on behalf of Xcel is:

Allen D. Krug  
Managing Director, Government and Regulatory Affairs  
Xcel Energy Services Inc.  
414 Nicollet Mall--7th Floor  
Minneapolis, MN 55401  
612-330-6270

The Department recommends that the Commission **approve** Xcel's petition for changes in demand entitlements and its proposal to recover costs associated with the demand entitlements in the petition effective with November 1, 2010 billing cycles.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ MARLON GRIFFING  
Financial Analyst  
651-297-3900

MG/ja  
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

PUBLIC COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE,  
DIVISION OF ENERGY RESOURCES

DOCKET No. G002/M-10-1163

**I. SUMMARY OF XCEL ENERGY'S REQUEST**

Pursuant to Minnesota Statute §216B.16, subd. 7, and Minnesota Rules 7825.2910, subpart 2, 7825.3100, subpart 9 and 7825.3200, Northern States Power Company, a Minnesota Corporation (Xcel or the Company), filed a demand-entitlement petition (Petition) on November 1, 2010.

In its Petition, Xcel requests approval from the Minnesota Public Utilities Commission (Commission) to implement its proposed 2010-2011 Natural Gas Heating Season Supply Plan effective November 1, 2010. The Company requests that adjustments in firm contract demand entitlements provisionally included in the Company's purchased gas adjustment (PGA) be effective that same date. Xcel requests changes in its firm pipeline demand entitlement levels<sup>1</sup> as follows:

- increase its total Design-Day requirement by 5,124 dekatherms (Dth);
- change the resources used to meet the Design-Day requirement;
- decrease its reserve margin by 4,486 Dth;
- change the Jurisdictional Allocations between Minnesota and North Dakota to reflect usage patterns; and
- change its Supply Reservation fees.

---

<sup>1</sup> The entitlement levels discussed in Xcel Energy's system filing are the combined entitlements for Xcel Energy's Minnesota and North Dakota jurisdictions. Minnesota's portion of the entitlements is the total combined entitlements times the Minnesota allocation factor discussed below. The OES has included OES Attachment 1, which shows the effect of the demand entitlement changes in the Minnesota jurisdiction.

Specifically, Xcel requests the following changes in demand volumes:

<b>Type of Entitlement</b>	<b>Proposed Change</b>	<b>Rate</b>	<b>Months</b>	<b>Proposed Cost Change</b>
NNG TF12 (Jan - Dec)	(23,666)	\$10.2300	5	\$(1,210,515.90)
NNG TF12 (Jan - Dec)	(23,666)	\$5.6830	7	\$(941,457.15)
NNG TF12 (Jan - Dec)	(6,452)	\$13.8660	5	\$(447,317.16)
NNG TF12 (Jan - Dec)	(6,452)	\$5.6830	7	\$(256,667.01)
NNG TF5 (Nov - Mar)	(1,028)	\$15.1530	5	\$(77,886.42)
NNG TF12 (Jan - Dec)	15,911	\$3.8000	12	\$725,541.60
NNG TF12 (Jan - Dec)	14,207	\$3.8000	12	\$647,839.20
NNG TF5 (Nov - Mar)	1,028	\$3.8000	5	\$19,532.00
NNG TFX (Nov - Mar)	(5,170)	\$15.1530	5	\$(391,705.05)
NNG TFX (Apr - Jun, Sep - Oct)	(4,325)	\$5.6830	5	\$(122,894.88)
NNG TFX (Nov - Mar)	5,170	\$3.8000	5	\$98,230.00
NNG TFX (Apr - Jun, Sep - Oct)	4,325	\$3.8000	5	\$82,175.00
Northern Chisago realignment savings				\$(1,875,125.76)
ANR FTS (Jan - Dec)	50,000	\$5.3626	12	\$3,217,536.00
ANR FTS (Jan - Dec)	(22)	\$4.1700	12	\$(1,100.88)
ANR FSS (Jan - Dec)	6	\$2.0400	12	\$146.88
GLGT FT (Jan - Dec)	(3,799)	\$10.2780	12	\$(468,553.46)
GLGT FT (Jan - Dec)	3,509	\$9.4560	5	\$165,905.52
GLGT FT (Jan - Dec)	4,475	\$9.4560	7	\$296,209.20
GLGT FT (Apr - Oct)	(960)	\$10.2780	7	\$(69,068.16)
Total for Change in Pipeline Entitlement				\$1,265,949.33

As indicated in the table above, Xcel proposes a number of changes in its demand entitlements that reduce costs on the Northern Natural Gas (NNG) system by approximately \$1.88 million. Offsetting the decreases are increases in ANR volumes. The Department analyzed this proposed change in ANR volumes in Xcel's previous demand entitlement filing, G002/M-09-1287, and concluded it was reasonable, as discussed further below.

Xcel also requests approval to recover certain Producer Demand and Storage costs from both firm and interruptible customers in the Company's monthly PGA, effective with the November 1, 2010 billings. The proposal is a carryover of a plan first presented in the Company's 2007-2008 demand-entitlement filing, Docket No. G002/M-07-1395 (2007-2008 Demand Entitlement) and again in Xcel's subsequent demand entitlement filings (Docket Nos. G002/M-08-1315 and G002/M-09-1287). While the Commission has not yet acted on these filings, the Department (then known as the Office of Energy Security) recommended approval of this proposal, which reflects Xcel's assessment of which demand-entitlement costs associated with transportation capacity and third-party supply reservation levels should be assigned to interruptible customers.

Finally, Xcel has provided a summary of hedging transactions in place for the 2010-2011 heating season in response to reporting requirements established in the Commission's May 27, 2008 Order in Docket No. G002/M-08-46.

## **II. DEPARTMENT ANALYSIS OF XCEL'S REQUEST**

The Minnesota Department of Commerce, Division of Energy Resources' (Department) analysis of the Company's request includes a description and an evaluation of the Company's demand-entitlement petition. The Department separately discusses each part of the Company's request. Based on its investigation, the Department concludes that the Company's proposed 2010-2011 demand entitlement level is appropriate.

### *A. XCEL'S PROPOSED DESIGNN-DAY LEVELS*

#### *1. Xcel's Customer Base*

Xcel's service areas were unchanged from the 2009-2010 heating season to the 2010-2011 heating season.

#### *2. Xcel Forecast*

The Company applies two forecast methodologies to arrive at its estimate of its Design Day requirement forecast for 2009-2010. One is the Actual Peak Use per Customer Design Day (UPC DD), while the other is the Average Monthly Design Day (Avg. Monthly DD). The Company has employed these techniques in its last several demand-entitlement filings. In its analysis of Xcel's forecast methods, the Department assesses the foundations of the methodologies.

##### *a. Actual Peak Use per Customer Design Day*

The UPC DD method employs a use-per-customer number of 1.57393 Dth to find the Design Day demand forecast, based on the actual use per customer on Thursday, January 29, 2004, the coldest day in recent years. The Department notes that Xcel has used this value in all demand-entitlement dockets subsequent to 2004. The 1.57393 value is multiplied by estimates of total customers to arrive at the total expected Design-Day demand for the Xcel system. Thus, the way customers are distributed among service areas does not affect the aggregate forecasts produced by the UPC DD method because the total number of customers and the resulting total volume is unchanged no matter where the customers are assigned.

*b. Average Monthly Design Day*

The Avg. Monthly DD method is a statistical method that uses linear regression to estimate Design-Day demand. Because Xcel has performed regression analyses on each demand area for both residential and commercial customers, the coefficients used to estimate use per customer vary from service area to service area. Consequently, the shifting of customers among demand areas can affect the aggregate forecasts produced by the Avg. Monthly DD method. Since the Company's service areas were unchanged from the 2009-2010 heating season to the 2010-2011 heating season, there is no such change to discuss.

*c. Average Monthly Design Day Reliability*

Xcel Energy notes that 58 months of data is available as inputs for the Avg. Monthly DD method. The Company states that this number of data points is less than the 60 months it would prefer to use as data points in its statistical analysis. However, structural revisions to the Company's demand-area regions in 2005 (described in its 2008-2009 Demand Entitlement filing) mean that the data for the service areas is consistent only back to that year.

The Department notes that Xcel has been increasing the data points each year in its Demand Entitlement filings and expects the Company will get to 70 data points in the 2011-2012 filing. Further, at that time, it will be possible to examine more closely whether Xcel's use of the UPC DD from 2004 warrants any adjustment compared to the estimates of use per customer using linear regression. The Department agrees with Xcel that the use per customer during extreme weather is "dynamic" meaning that a linear equation might not capture the amount of demand volumes needed to provide service on peak days. However, the Department recommends that Xcel examine in its next demand filing the question of whether the amount of demand resources needed to serve firm customers should be revised to reflect any measurable changes in the amounts firm customers use on peak days.

The Company cites the R-squared values for customer groups within the various service areas as a way evaluating the reliability of the forecasts. The Department will not repeat the general discussion of the R-squared value from previous comments (e.g. page 4 of the Department's comments in G002/M-09-1287), but notes that the results are similar to the results from last year, that 23 of the 30 R-squared values reported for the customer classes in Xcel's service areas were 95 percent or greater and that 19 of these 23 predictions are in Minnesota service areas. Of the 7 cases in the Xcel system where the R-squared values drop below the 95-percent threshold, 1 residential case and 1 commercial case are in North Dakota, while 5 commercial cases are in Minnesota.

The customer counts in two of these Minnesota service-area commercial customer groups are small (132 and 154); in small samples, outliers in the populations can have large impacts on the regression analyses and their explanatory value. Meanwhile, the R-squared values for the

commercial class service areas in the three other Minnesota cases lie between 92.5 percent and 94.5 percent. The two R-squared values for North Dakota service areas that do not meet the 95 percent standard are 92.3 percent and 94.5 percent. These scores still suggest that the Avg. Monthly DD method produce acceptable forecasts, provided that other aspects of the regression analysis are acceptable. The Department's review of Xcel's forecast method indicates that the analysis is reasonably sound.

In sum, the Department recommends that the Company continue to use the two methods to develop its Design-Day estimate. The Department also expects that Xcel Energy will continue to increase the number of data points in the Avg. Monthly DD method as they become available and will reach 70 data points in the next demand filing. As noted above, the Department recommends that Xcel examine in its next demand filing whether the amount of demand resources needed to serve firm customers should be revised to reflect any measurable changes in the amounts firm customers use on peak days.

### *3. Xcel's Forecasts*

Xcel projects that its system (Minnesota and North Dakota) Design-Day requirement will increase by 6,750 Dth to 782,224 Dth in the 2010-2011 heating season, a percentage increase of 0.9. The Company's forecast of its Minnesota Design-Day requirement increases by 5,124 Dth to 699,611 Dth, an increase of 0.7 percent. On the other hand, the forecasted usage for North Dakota for 2010-2011 is 82,613 Dth, 2.0 percent more than the predicted 80,987 Dth for 2009-2010.

Xcel's customer forecast shows the number of Minnesota customers increasing by 2,897 from 433,571 in the 2009-2010 forecast to 436,468 in the 2010-2011 forecast, a 0.7 percent increase. Furthermore, the North Dakota customer count is forecasted to increase 2.0 percent to 47,082 in 2010-2011, up from 46,143 in 2009-2010.

The Department notes that the smaller rate of increase in forecasted Minnesota gas consumption volume indicates that the proportion of Design-Day responsibility on the Xcel system shifts slightly from Minnesota to North Dakota. According to the petition, the consumption allocator for Minnesota for 2010-2011 is 89.44 percent, down from 89.56 percent the year before.

The percentage increases in forecasted usage and customers in 2010-2011 are identical in both Minnesota and North Dakota. It does not necessarily follow that the customer counts and usage will track so closely. For example, North Dakota's customer count was forecasted to increase in 2009-2010, while the gas usage forecast was for a decrease. The long-term trend in gas usage per residential customer has been downward, which the Department stated was consistent with the contrasting movements in the North Dakota forecasts. On the other hand, the more important factor in the current docket may be the short-term trend of a rebounding U.S. economy, which is consistent with increases in both forecasted gas usage and customer count.

In any event, the Department concludes from the Company's descriptions of its forecasting techniques that all aspects of Xcel's forecasting of Design-Day levels are performed appropriately.

*B. CHANGES IN XCEL ENERGY'S DESIGN-DAY RESOURCES*

Xcel Energy's filing reflects changes in the resources used to meet its Design Day customer requirements. Overall, the Company's demand entitlements dropped slightly. More notable than the change in volume of entitlements are changes in Xcel's mix of sources, changes that have reduced its expenses by nearly \$1.9 million, prior to consideration of the gas for the Fargo lateral construction project. Moreover, the same changes enable the Company to provide gas for its Fargo lateral construction project (Fargo lateral), which was put into service on October 9, 2009.

*1. Northern Natural Gas Company Entitlements*

The majority of Xcel's firm pipeline transportation contracts are with Northern Natural Gas (Northern). Most of these contracts were put in place in 2007 and run through 2017. The Company states that it has not modified its entitlement levels with Northern since its filing in Docket No. G002/M-09-1287 (2009-2010 Demand Entitlement Filing). However, Xcel, effective November 1, 2010, exercised a one-time option it had with Northern to realign 36,616 Dth/day of capacity (Northern Chisago realignment discount option) to Chisago, Minnesota, the interconnect point between Northern and the Viking pipeline network. The option allows Xcel to replace maximum tariff rate capacity in favor of discounted capacity. The realignment provides the Company with savings of \$1,875,125.76. Therefore, the Department concludes that exercise of the realignment option is reasonable.

*2. ANR Entitlements*

On November 1, 2010, a Precedent Agreement Xcel executed with ANR on June 30, 2008, went into effect. Under the agreement the Company received an additional entitlement of 50,000 Dth/day from the Joliet Hub in Chicago delivered to Marshfield, Minnesota, where ANR and Viking interconnect. This capacity allowed the Company to effectuate the Northern Chisago realignment discount option and to have gas supplies for the increased capacity the Fargo lateral project created. The entitlement under the agreement increases to 57,500 Dth/day on November 1, 2011, and 66,500 Dth/day on November 1, 2012.

This agreement results in savings for the Company via the Northern Chisago realignment discount option and enables Xcel to provide supply for the increased capacity provided by the Fargo lateral. As explained in the 2009-2010 Demand Entitlement Filing, the Fargo lateral addressed Design Day capacity shortfalls that the Company had identified in the Fargo part of its system. For these reasons, the Department concludes that the Precedent Agreement is reasonable.

3. *Great Lakes Gas Transmissions (GLGT) Entitlements*

On April 1, 2010, Xcel and GLGT put into place a four-year contract to replace a contract that expired the day before. The new agreement, for four years, has a volume of 4,475 Dth/day for the summer months and 3,509 Dth/day November to March. The contract it replaced had a year-round volume of 3,799 Dth/day.

Xcel uses the summer capacity to fill its ANR storage in Michigan. The Company formerly relied upon the capacity release market to fill its summer storage account. The winter capacity is used to transport gas from Emerson, Minnesota to Carlton, Minnesota to help Xcel meet its Carlton obligation with Northern.

The Department notes that the terms of the new contract enable Xcel to obtain more capacity (4,073 Dth/day versus 3,799 Dth/day) for less cost (\$464,114 versus \$468,553) than under the expired contract. Moreover, the rate for the summer capacity is guaranteed, whereas the Company's previous practice of buying gas to store was decided by market prices. The decreased cost and added certainty of supply lead the Department to conclude that the new contract is reasonable.

C. *CHANGE IN XCEL'S RESERVE MARGIN*

Xcel proposes to decrease its projected Design Day reserve margin in Minnesota from 7.7 percent in 2009-2010 to 6.3 percent in 2010-2011. See Department Attachment 1. Xcel states that it bases its reserve margin on the firm resources necessary to meet projected firm customer demand plus the capability of either the largest pump at its Wescott facility used to vaporize LNG or either of its St. Paul metro propane-air peak-shaving plants. The capacity decision reflects Xcel Energy's assessment of the most economical method of adding capacity to meet demand beyond the forecasted Design Day demand. The reserve margin balances ensuring reliability of supply on days of extreme cold weather with the likelihood of experiencing Design Day conditions.

Xcel states that its proposed reserve margin in Minnesota of 44,170 Dth/day represents the most practical combination of available resources to meet its Design Day needs. The Company further states that the most economical method of adding capacity often involves adding increments that do not precisely match expected changes in demand.

In any case, Xcel's proposed reserve margin is within the 5-7 percent range that serves as a rule of thumb in deciding whether a given margin is reasonable. This level contrasts with the previously cited 2009-2010 reserve margin, which was well outside this range. Although it has increased its Design Day requirement by 5,124 Dth/day in 2010-2011 compared with 2009-2010, the Company has reduced its total Design Day capacity by 4,486 Dth/day. The combination of changes has led to the decreased reserve margin. The Department concludes that the 6.3 percent



reserve margin is reasonable given that it is within the preferred range and is 1.4 percent less than the 2009-2010 reserve margin.

*D. CHANGES IN XCEL'S JURISDICTIONAL ALLOCATIONS*

*1. Increase in Minnesota Jurisdiction Allocation Factor*

The previously noted 0.7 percent increase in forecasted Minnesota usage and 2.0 percent forecasted increase in North Dakota usage is reflected in the new Minnesota Jurisdictional Allocation Factor. The factor is calculated by dividing the Design Day forecasted demand for Minnesota (743,781 Dth) by the same demand for the Company's system (782,224 Dth). The Avg. Monthly DD results are used to update the allocation factor, which fell from 89.56 percent to 89.44 percent. Small annual changes in the allocation factor such as that identified are almost inevitable. A change in a handful of customers in one state or the other can change the total numbers upon which the allocation factor is based and change the allocation between the states, but not significantly. The small change identified in the above analysis falls into this category. Therefore, the Department concludes that Xcel's proposal is reasonable.

*2. Decrease in Minnesota Grand Forks Area Jurisdiction Allocation Factor*

The allocation factor for East Grand Forks, Minnesota, for Design Day demand in the Grand Forks Area Jurisdiction decreased slightly from 14.67 percent to 14.59 percent. The increase is a result of the Design Day forecasted demand for East Grand Forks increasing at 1.2 percent while the Design Day forecasted demand for the rest of the territory served by the Grand Forks area transmission-looping project increased 2.1 percent. Thus, the greater rate of increase in the North Dakota portion of the Grand Forks Area caused the decrease in the East Grand Forks allocation factor. This small change in the allocation factor is similar to the change identified in the analysis concerning the Minnesota jurisdictional allocation factor in that small shifts from year to year between the two service areas in the Grand Forks area are to be expected. Therefore, the Department concludes that Xcel's proposal is reasonable.

*E. CHANGES IN XCEL'S SUPPLIER RESERVATION FEES*

Xcel notes that its Supplier Reservation fees have changed. **[TRADE SECRET DATA HAS BEEN EXCISED]** The new expense level reflects updated prices of the firm gas supply reservations. Therefore, the Department concludes that Xcel's proposal is reasonable.

*F. XCEL'S PLANNED USE OF HEATING-SEASON FINANCIAL INSTRUMENTS*

In compliance with reporting requirements of the Commission's Order in Docket No. G002/M-08-46, Xcel includes a table summarizing the Company's hedging transactions for the 2010-2011 heating season. See Xcel Attachment 3. The information in the table is not sufficient to determine the cost to the Company of each transaction because the transactions have not closed at the time of the filing. Therefore, the portion of the total dollars shown for each transaction that relate to the Company's \$32 million cap on hedging costs cannot be determined. The Department concludes that the Company has met its reporting requirement, and requests that Xcel provide updated information when it is available.

*G. XCEL'S PGA COST RECOVERY PROPOSAL*

Xcel proposes to reflect the costs associated with the demand entitlements in the petition in the PGA effective with November 1, 2010 billing cycles. The Department concludes that this effective date is reasonable because it reflects when its various supply and demand contracts for the 2010-2011 Heating Season demand entitlement take effect.

*H. XCEL ENERGY'S PROPOSAL TO ASSIGN DEMAND COSTS TO INTERRUPTIBLE CUSTOMERS*

Xcel Energy states that interruptible sales customers are receiving the benefits of storage and balancing services on non-Design Days. Thus, a portion of these costs could justifiably be recovered from these customers. The Company, therefore, developed a proposal to make such an assignment of costs on a prospective basis and presented it in Comments in the Company's 2007-2008 Demand Entitlement filing. Commission action in that docket is pending, as it is in the Company's 2008-2009 and 2009-2010 Demand Entitlement filings, where the Company repeated the proposal.

The Department concluded in Comments dated October 7, 2008 that Xcel's proposal represents a systematic approach to determining when interruptible customers benefit from the services associated with demand costs. Therefore, the Department concluded that the proposal is reasonable. The Department position on the matter is unchanged in the current docket.

**III. CONCLUSIONS AND RECOMMENDATIONS**

The Department concludes that Xcel has sufficiently supported its:

- Proposed Design-Day levels of capacity, including the derivation of its forecasting methods;
- Changes in Design-Day resources;

- Reduction in reserve margin;
- Changes in jurisdictional allocations;
- Changes in supplier reservation fees; and
- Proposal to assign demand costs to interruptible customers.

Moreover, the Department concludes that Xcel has met its reporting requirement for planned use of heating-season financial instruments. The Department recommends that Xcel provide updated information when it is available.

Therefore, the Department recommends that the Commission approve Xcel's proposed demand entitlements and its proposal to recover costs associated with the demand entitlements in the petition effective with November 1, 2010 billing cycles.

The Department also recommends that Xcel examine in its next demand filing whether the amount of demand resources needed to serve firm customers should be revised to reflect any measurable changes in the amounts firm customers use on peak days, based on its forecast using 70 data points and any other factors the Company considers to be reasonable.

/ja

**Docket No. G002/M-10-1163**  
**Demand Entitlement Analysis--Minnesota Jurisdiction\***

**Northern States Power Company d/b/a Xcel Energy**

Heating Season	Number of Firm Customers			Design-Day Requirement			Total Entitlement Plus Peak Shaving			Reserve Margin	
	(1) Number of Customers	(2) Change from Previous Year	(3) % Change From Previous Year	(4) Design Day (Dth)	(5) Change from Previous Year	(6) % Change From Previous Year	(7) Total Design-Day Capacity (Dth)	(8) Change from Previous Year	(9) % Change From Previous Year	(10) Reserve Margin	(11) % of Reserve [(7)-(4)]/(4)
2010-2011**	436,594	2,896	0.67%	699,611	5,124	0.74%	743,781	(4,486)	-0.60%	44,170	6.31%
2009-2010**	433,698	4,846	1.13%	694,487	9,482	1.38%	748,267	15,976	2.18%	53,780	7.74%
2008-2009**	428,852	(2,651)	-0.61%	685,005	1,288	0.19%	732,291	10,785	1.49%	47,286	6.90%
2007-2008**	431,503	7,088	1.67%	683,717	5,984	0.88%	721,506	25,249	3.63%	37,789	5.53%
2006-2007	424,415	2,845	0.67%	677,733	6,887	1.03%	696,257	4,568	0.66%	18,524	2.73%
2005-2006	421,570	10,584	2.58%	670,846	21,191	3.26%	691,689	16,569	2.45%	20,843	3.11%
2004-2005	410,986	9,353	2.33%	649,655	46,187	7.65%	675,120	31,805	4.94%	25,465	3.92%
2003-2004	401,633	5,826	1.47%	603,468	(4,388)	-0.72%	643,315	1,040	0.16%	39,847	6.60%
2002-2003	395,807	10,913	2.84%	607,856	3,383	0.56%	642,275	1,928	0.30%	34,419	5.66%
2001-2002	384,894			604,473			640,347				
Average:			1.51%			1.78%			1.98%		5.27%

Heating Season	Firm Peak-Day Sendout				Excess per Customer [(7) - (4)]/(1)	Design Day per Customer (4)/(1)	Entitlement per Customer (7)/(1)	Peak-Day Send per Customer (12)/(1)
	(12) Firm Peak-Day Sendout (Dth)	(13) Change from Previous Year	(14) % Change From Previous Year	(15)				
2010-2011	NA			0.1012	1.6024	1.7036	NA	
2009-2010	590,931	(10,494)	-1.74%	0.1240	1.6013	1.7253	1.3625	
2008-2009	601,425	15,551	2.65%	0.1103	1.5973	1.7076	1.4024	
2007-2008	585,874	16,911	2.97%	0.0876	1.5845	1.6721	1.3578	
2006-2007	568,963	31,303	5.82%	0.0436	1.5969	1.6405	1.3406	
2005-2006	537,660	286	0.05%	0.0494	1.5913	1.6407	1.2754	
2004-2005	537,374	(23,876)	-4.25%	0.0620	1.5807	1.6427	1.3075	
2003-2004	561,250	26,865	5.03%	0.0992	1.5025	1.6017	1.3974	
2002-2003	534,385	57,882	12.15%	0.0870	1.5357	1.6227	1.3501	
2001-2002	476,503			0.0932		1.6637		
<b>Average</b>			3.49%	0.0790	1.5699	1.6353	1.3473	

\*-Some numbers may differ from Xcel Attachments due to rounding

\*\*-Reflects the UPC DD method.

## **CERTIFICATE OF SERVICE**

I, Jan Mottaz, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, 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 Comments**

**Docket No** G002/M-10-1163

Dated this **15th day of April 2011**

**/s/Jan Mottaz**

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	Paper Service	No	OFF_SL_10-1163_10-1163
Julia	Anderson	Julia.Anderson@state.mn.us	Office of the Attorney General-DOC	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_10-1163_10-1163
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_10-1163_10-1163
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall7th Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_10-1163_10-1163
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Paper Service	No	OFF_SL_10-1163_10-1163
Michael	Bradley	bradley@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	OFF_SL_10-1163_10-1163
Robert S.	Carney, Jr.			4232 Colfax Ave. S.  Minneapolis, MN 55409	Paper Service	No	OFF_SL_10-1163_10-1163
Christopher	Clark	christopher.b.clark@xcelenergy.com	Xcel Energy	5th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Paper Service	Yes	OFF_SL_10-1163_10-1163
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Paper Service	No	OFF_SL_10-1163_10-1163
Jerry	Dasinger	jerry.dasinger@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East  St. Paul, MN 551012147	Paper Service	Yes	OFF_SL_10-1163_10-1163

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeffrey A.	Daugherty	jeffrey-daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Paper Service	No	OFF_SL_10-1163_10-1163
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_10-1163_10-1163
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_10-1163_10-1163
Chris	Fittipaldi	christopher.fittipaldi@state.mn.us	Public Utilities Commission	Suite 350 121 Seventh Place East St. Paul, MN 551012147	Electronic Service	No	OFF_SL_10-1163_10-1163
Edward	Garvey	garveyed@aol.com		32 Lawton Street St. Paul, MN 55102	Paper Service	No	OFF_SL_10-1163_10-1163
Ronald M.	Giteck	ron.giteck@state.mn.us	Office of the Attorney General-RUD	Residential Utilities Division 445 Minnesota Street, 900 BRM Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_10-1163_10-1163
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Paper Service	No	OFF_SL_10-1163_10-1163
Lloyd	Grooms	lgrooms@winthrop.com	Winthrop and Weinstine	Suite 3500 225 South Sixth Street Minneapolis, MN 554024629	Paper Service	No	OFF_SL_10-1163_10-1163
Todd J.	Guerrero	tguerrero@fredlaw.com	Fredrikson & Byron, P.A.	Suite 4000 200 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_10-1163_10-1163
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_10-1163_10-1163

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Karen Finstad	Hammel	Karen.Hammel@state.mn.us	Office of the Attorney General-DOC	1400 BRM Tower 445 Minnesota Street St. Paul, MN 551012131	Electronic Service	No	OFF_SL_10-1163_10-1163
Richard	Haubensak	RICHARD.HAUBENSAK@CONSTELLATION.COM	Constellation New Energy Gas	Suite 200 12120 Port Grace Boulevard La Vista, NE 68128	Paper Service	No	OFF_SL_10-1163_10-1163
Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Paper Service	No	OFF_SL_10-1163_10-1163
Sandra	Hofstetter	N/A	MN Chamber of Commerce	1140 Mary Hill Cir.  Hartland, WI 53029-8009	Paper Service	No	OFF_SL_10-1163_10-1163
Paula N.	Johnson		Interstate Power and Light Company	200 First Street SE PO Box 351 Cedar Rapids, IA 524060351	Paper Service	No	OFF_SL_10-1163_10-1163
Richard	Johnson	johnsonr@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Center90 South Seventh Street  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-1163_10-1163
Nancy	Kelly	nkelly@greeninstitute.org	The Green Institute	#110 2801 21st Avenue Minneapolis, MN 55407	Electronic Service	No	OFF_SL_10-1163_10-1163
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center80 South 8th Street  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-1163_10-1163
Nancy	Lange	midwestoffice@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Paper Service	No	OFF_SL_10-1163_10-1163



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert S	Lee	RSL@MCMLAW.COM	Mackall Crouse & Moore Law Offices	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 554022859	Paper Service	No	OFF_SL_10-1163_10-1163
John	Lindell	agorud.ecf@state.mn.us	Office of the Attorney General-RUD	900 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_10-1163_10-1163
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620  St. Paul, MN 551640620	Paper Service	Yes	OFF_SL_10-1163_10-1163
Matthew P	Loftus	matthew.p.loftus@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5  Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_10-1163_10-1163
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Paper Service	No	OFF_SL_10-1163_10-1163
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_10-1163_10-1163
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_10-1163_10-1163
John	Moir	N/A	City of Minneapolis	City Hall Rm 301 M 350 South 5th Street Minneapolis, MN 55415-1376	Paper Service	No	OFF_SL_10-1163_10-1163
Andrew	Moratzka	apm@mcmlaw.com	Mackall, Crouse and Moore	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 55402	Paper Service	No	OFF_SL_10-1163_10-1163
David W.	Niles		Avant Energy Services	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Paper Service	No	OFF_SL_10-1163_10-1163

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph V.	Plumbo		Local Union 23, I.B.E.W.	932 Payne Avenue  St. Paul, MN 55130	Paper Service	No	OFF_SL_10-1163_10-1163
Michelle	Rebholz	michelle.rebholz@state.mn.us	Public Utilities Commission	Suite 350121 Seventh Place East  St. Paul, MN 55101	Electronic Service	No	OFF_SL_10-1163_10-1163
Richard	Savelkoul	rsavelkoul@felhaber.com	Felhaber, Larson, Fenton & Vogt, P.A.	444 Cedar St Ste 2100  St. Paul, MN 55101-2136	Paper Service	No	OFF_SL_10-1163_10-1163
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Paper Service	No	OFF_SL_10-1163_10-1163
Kathleen D.	Sheehy	kathleen.sheehy@state.mn.us	Office of Administrative Hearings	PO Box 64620  St. Paul, MN 551640620	Paper Service	No	OFF_SL_10-1163_10-1163
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Paper Service	No	OFF_SL_10-1163_10-1163
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_10-1163_10-1163
Lisa	Veith		City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Paper Service	No	OFF_SL_10-1163_10-1163