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June 28, 2024

VIA ELECTRONIC FILING

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

Re: In the Matter of a Commission Investigation into Gas Utility Resource Planning

Docket Nos. G002, G008, G011/CI-23-117

Comments of Minnesota Energy Resources Corporation

Dear Mr. Seuffert:

On May 7, 2024, the Minnesota Public Utilities Commission (“Commission”) issued a Notice of Extended Comment Period requesting comments be filed in the above-referenced docket on the following:

Issue: What filing requirements should the Commission adopt for Xcel Energy, CenterPoint Energy, and Minnesota Energy Resource Corporation’s natural gas integrated resource plans?

Topic(s) Open for Comment:

1. What, if any, additional filing requirements should the Commission adopt for natural gas integrated resource plans (“Gas IRPs”)?
2. Three utilities have been instructed to file Gas IRPs on a staggered filing schedule.¹ Which utility should file its plan first and why? When should that plan be filed? When should the other utilities file their plans?

¹ Order Establishing Framework for Natural Gas Utility Integrated Resource Planning issued March 27, 2024 in docket nos. G-008,G-002,G-011/CI-23-117 and G-999/CI-21-565. At 8

3. For Xcel Energy, what, if any, direction should the Commission give regarding Xcel's analysis and reporting on methane emissions? ²
4. Are there any other issues or concerns related to this matter?

The Commission also included the following Topic Open for Comment, which is a repeated topic from the Commission's September 20, 2023 Notice of Comment issued in the above-referenced dockets:

5. How should equity be incorporated into gas resource plans and the gas planning process? Consider the utility's ability to impact equity in terms of:
 - a. Distribution of burdens and benefits (for example, where new infrastructure is built)
 - b. Participation in decision-making (for example, when, where, and how public meetings, listening sessions, etc. are held)
 - c. Solutions that match how people want to live their lives (for example, matching utility programs and services to individual community needs and wants, rather than one-size-fits-all solutions)
 - d. Redress for previous harms (for example, considering how to locate utility jobs and affordability programs in communities that have been impacted by environmental injustices or another systemic disinvestment).

And lastly, the Commission included the following Topic Open for Comment especially for members of the public and groups that interface with the public:

6. How does your community use natural gas in unique ways, ways that the Commission or other groups might not see (for example, your need for a particular power source or appliance)?
7. Before making final decisions, how can utilities best engage with communities to make sure community needs are considered in resource plans? How should utilities document community feedback as well as explain why community input was or was not used in final gas resource plans?

² For Xcel Energy only, the Commission moved reporting of the methane emission information in the Environmental Performance Outcome Metrics — methane emissions from the Company's distribution system, upstream methane emissions, and methane emissions across the full fuel cycle — to Natural Gas Resource Plan dockets. See Order Accepting 2021 and 2022 Reports, Suspending Decisions on Baselines and Targets, and Modifying Reporting Requirements issued January 26, 2024 in docket no. E002/CI-17-401 at Ordering Paragraph 9.

Minnesota Energy Resources Corporation (“MERC” or the “Company”) would like to thank the Commission for the opportunity to provide these Comments.

1. What, if any, additional filing requirements should the Commission adopt for natural gas integrated resource plans (Gas IRPs)?

On May 31, 2024, MERC, Northern States Power Company, doing business as Xcel Energy (“Xcel Energy”), and CenterPoint Energy Minnesota Gas (“CenterPoint”), (collectively, the “Gas Utilities”) filed Straw Proposals in the above-referenced dockets. In their Straw Proposals, the Gas Utilities provided clarifications to specific Order Points to the Commission’s Order Establishing Framework for Natural Gas IRP issued on March 27, 2024 (the “March 27, 2024 Order”), as well as providing additional proposed decision options for the Commission to consider. MERC is in agreement with the clarifications and proposed decision options provided by the Gas Utilities in their May 31, 2024 Straw Proposals, and does not have any additional comments at this time.

2. Three utilities have been instructed to file Gas IRPs on a staggered filing schedule. Which utility should file its plan first and why? When should that plan be filed? When should the other utilities file their plans?

The Gas Utilities each spoke to this topic in their May 31, 2024 Straw Proposals. In regards to which utility should file its plan first, in their Straw Proposals, Centerpoint stated they would not be opposed to going first, and Xcel Energy stated they propose to be the first as well. While recognizing that this is ultimately a decision for the Commission, MERC does not oppose either of the two other Gas Utilities being the first utility to file their Gas IRP. Having a larger utility with a more contiguous service territory than MERC, would likely yield lessons learned that can be applied to MERC’s subsequently-filed Gas IRP.

Additionally there could be added benefits by the Commission identifying Centerpoint to be the first utility to file a Gas IRP. Centerpoint is the largest gas utility in Minnesota, and thus their Gas IRP may be able to cast a larger net with regards to the Gas Utilities, stakeholders and the Commission gaining insight, guidance and lessons learned from the Gas IRP process and reporting. Additionally, Centerpoint’s Gas IRP would be able to inform the Commission on Gas IRP reporting from a gas-only utility perspective.

As stated in the May 31, 2024 Straw Proposals, the Gas Utilities anticipate being able to file an initial Gas IRP in late, or at the end of, 2026.

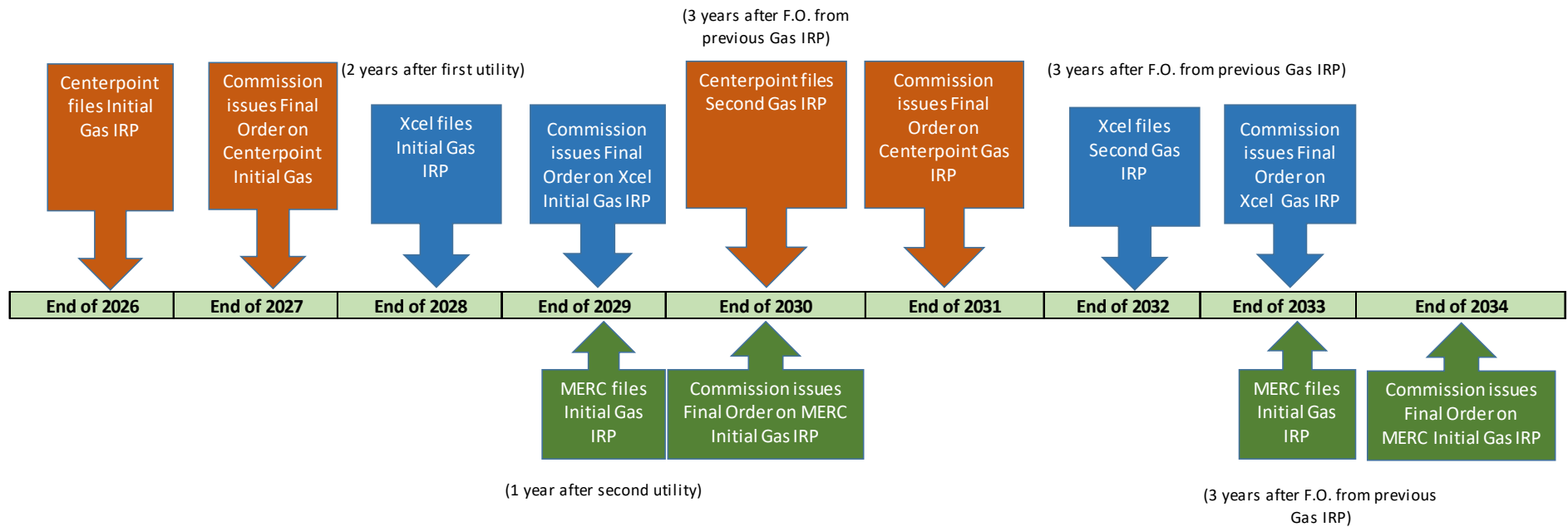
In regards to the timing of when the remaining utilities should file their Gas IRP, the Company believes that it would be beneficial for there to be a two-year cadence between the filings of the Initial Gas IRPs of the first and second utility, and a one-year cadence for the third utility to file their Initial Gas IRP. Allowing a two year span between the Initial Gas IRP filings of the first and second utility would allow the second utility to gain knowledge and lessons learned from the first utility’s Initial Gas IRP filing

and provide adequate time for the second utility to incorporate those lessons learned along with feedback from stakeholders and determinations from the Commission that will be provided via comment periods and final orders from the first utility's Initial Gas IRP docket. The two year cadence assumes a Commission Order is issued within 12 months of the Initial Gas IRP filing, and then allows another 12 months for the second utility to incorporate feedback and Commission determinations into their own Initial Gas IRP. The third utility would file their Initial Gas IRP one year after the second utility, as expectations would be that much of the learnings and feedback would be gleaned from the first utility's Gas IRP.

After all of the Gas Utilities have filed their initial Gas IRP, the filing cadence would then follow the Commission's Order Point 21 from the March 27, 2024 Order, which states that a new Gas IRP is required to be filed every three years from the date of the Commission's final order approving the previous resource plan.³ An example timeline for initial Gas IRP filings and subsequent Gas IRP filings as proposed by MERC is shown below. This filing cadence for the Initial Gas IRPs and subsequent Gas IRPs ensure that only one utility's Gas IRP docket will be active at a time, and thereby provides adequate spacing and balance of work for the Gas Utilities, stakeholders and the Commission.

³ Order Point 21 from the Commission's March 27, 2024 Order:

Utilities shall file natural gas resource plans consistent with a staggered filing schedule and require a new resource plan filed once every three years from the date of the Commission's final order approving the previous resource plan, or (if applicable) the date the Commission issued an order following a petition requesting reconsideration or amendment of an order approving a resource plan.



3. For Xcel Energy, what, if any, direction should the Commission give regarding Xcel’s analysis and reporting on methane emissions?

Xcel Energy provided a response to this topic in their May 31, 2024 Straw Proposal, and MERC does not have concerns over Xcel’s proposed decision option on this topic.

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

During the June 18, 2024 stakeholder meeting, led by Great Plains Institute (“GPI”), it was requested that the Gas Utilities include information, if possible, on the number of distribution system, expansion alternatives analysis (“EAA”) projects by cost threshold levels for the next five years. Cost thresholds defined at the June 18, 2024 stakeholder meeting were \$15 million, \$10 million, \$5 million, \$3 million, and \$1 million.

MERC currently does not forecast at the individual project level. Given this, the Company reviewed historical costs, by project, for growth (i.e. expansion) projects over the five year period of 2018 to 2023. The requested information is shown in the table below.

Threshold Level	Count of Expansion Projects above the Threshold
> \$15M	1
> \$10M	2
> \$5M	2
> \$3M	2
> \$1M	6

5. Equity

The Company provided information on this topic in its May 31, 2024 Straw Proposal and remains committed to considering equity in the Gas IRP analysis.

6. Community Influence

Finally, the Commission’s April 29, 2024 Notice sought input from members of the public and groups that interface with the public on how decisions about natural gas utility service impact them and how utilities should engage with the public regarding resource plans. MERC understands this question to be applicable to members of the public and groups that interface with the public and as such will not provide any comments on these associated questions within this section of the May 7, 2024 Notice. The Company recognizes the importance of customer choice in selecting energy solutions for their home or business and looks forward to receiving feedback from stakeholders on these topics.

Mr. Will Seuffert
June 28, 2024
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DATED: June 28, 2024

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Richard F. Stasik".

Richard F. Stasik
Director– State Regulatory Affairs

cc: Service List

In the Matter of a Commission Investigation
into Gas Utility Resource Planning Docket Nos. G002, G008, G011/CI-23-117

CERTIFICATE OF SERVICE

I, Colleen T. Sipiorski, hereby certify that on the 28th day of June, 2024, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed Initial Comments of MERC on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 28th day of June, 2024.

/s/ Colleen T. Sipiorski
Colleen T. Sipiorski

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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M. William	O'Brien	bobrien@mojaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_23-117_Official List
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