

June 2, 2026

Ms. Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**Re: In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals  
Docket No. G999/CI-21-565**

Dear Ms. Bergman:

The Citizens Utility Board of Minnesota (CUB), Fresh Energy, and Minnesota Center for Environmental Advocacy (MCEA) submit these joint preferred decision options.

**Preferred decision option:**

1

**Alternative decision options:**

Fresh Energy and MCEA modified CEE/Xcel/LIUNA/ECC 2

Fresh Energy and MCEA modified CEE/Xcel/LIUNA/ECC 13

Fresh Energy and MCEA modified CEE/Xcel/LIUNA/ECC MODIFIED 15<sup>1</sup>

Regarding PARTRIDGE NEW 14, while we appreciate that the decision option provides a path to review line extension allowances “if and when the utility experiences a sustained reduction in throughput,”<sup>2</sup> we note that throughput has already begun to decline in Minnesota. Minnesota utilities’ Gas Jurisdictional Annual Reports show that residential usage per customer has declined in recent years for the gas utilities. For convenience, the residential usage per customer reported by the three largest investor-owned gas utilities from 2016-2025 is included below in Figure 1.<sup>3</sup>

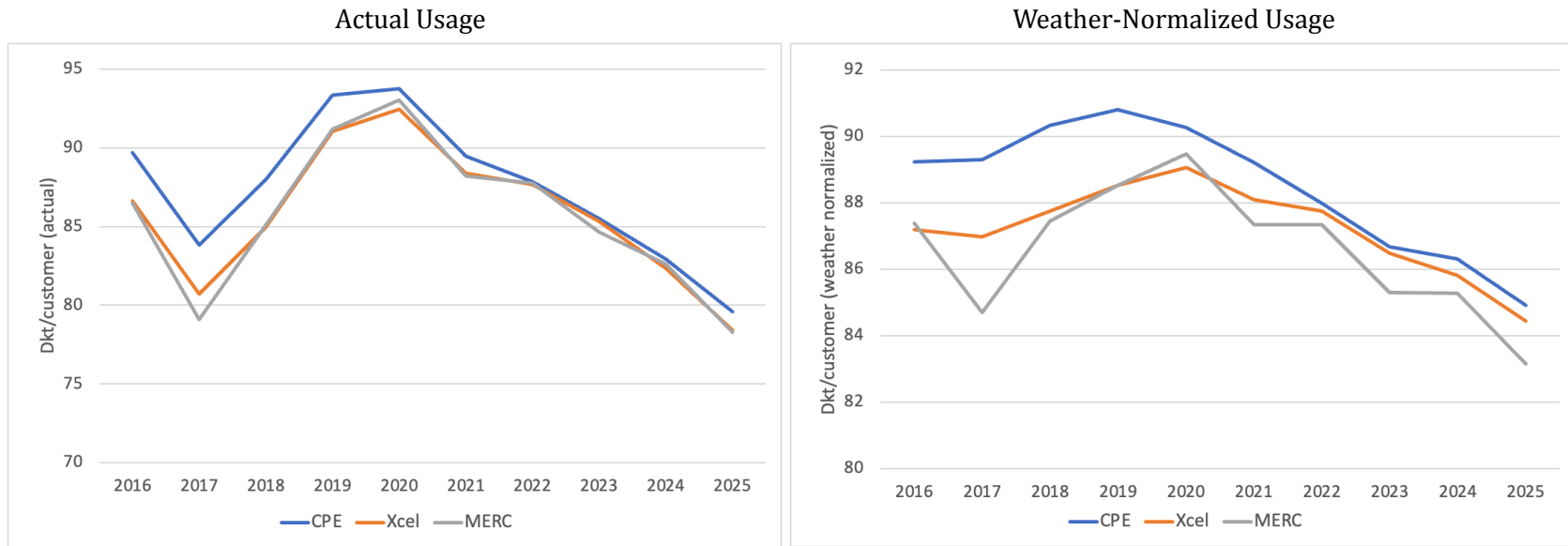
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<sup>1</sup> Fresh Energy and MCEA [Alternative Decision Options](#) filed May 29, 2026. Docket No. G999/CI-21-565

<sup>2</sup> Commissioner Partridge Updated [Preferred Decision Options](#) filed May 29, 2026. Docket No. G999/CI-21-565

<sup>3</sup> Gas Jurisdictional Annual Reports, 2017-2026. See MN DOC Efiling Dockets 17-04 to 26-04.

Figure 1. Residential usage (dekatherms) per customer, rolling three-year average, over ten-year lookback period, actual and weather-normalized data<sup>4</sup>



<sup>4</sup> Applying a three-year rolling average to actual data is the most accurate approach to evaluating trends in gas demand. Using weather-normalized data risks relying on inaccurate historical baselines and obscuring real world changes in climate.

Given these clear trends in customer gas use, we recommend the Commission adopt our preferred or alternative decision options listed above. In the event that the Commission would still like to move forward with PARTRIDGE NEW 14, we recommend the following modifications.

**CUB/Fresh Energy/MCEA suggested edits to PARTRIDGE NEW 14.**

Beginning with ~~2021~~~~2026~~ sales data and going forward, all rate-regulated utilities must file a compliance filing if and when the utility experiences a sustained reduction in throughput as calculated below:

- A. the utility's annual natural gas throughput, **calculated as a 3-year rolling average of actual data**, declines year over year for 3 consecutive years, or
- B. the utility's average annual natural gas sales per residential customer, **calculated as a 3-year rolling average of actual data**, declines year over year for 3 consecutive years.

The filing shall provide data related to the utility's natural gas sales trends for each customer class and use per customer over a 10-year lookback period, a discussion of factors that may be driving declining throughput or use per customer, and whether the declining throughput or per customer usage warrants changes to the utility's footage allowance and line extension policies. Following the utility filing, the Executive Secretary may open a comment period.

These modifications would apply a three-year rolling average to actual data, which is a more accurate approach to evaluating trends in gas demand. Using weather-normalized data risks obscuring real world changes in demand due to Minnesota's changing climate. We also recommend adjusting the beginning date from 2026 to 2021 to allow for consideration of a rolling three-year average over the past three years.

Sincerely,

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