



May 31, 2024

—Via Electronic Filing—

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

RE: STRAW PROPOSAL

IN THE MATTER OF A COMMISSION INVESTIGATION INTO GAS UTILITY

RESOURCE PLANNING

DOCKET NO. G008,G002,G011/CI-23-117

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Straw Proposal in response to the Public Utility Commission's May 7, 2024 Notice of Extended Comment Period regarding filing requirements for natural gas integrated resource plans.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Shannon Whiton at shannon.whiton@xcelenergy.com or contact me at bria.e.shea@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

Bria E. Shea Regional Vice President, Regulatory Policy

Enclosure cc: Service List

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IN THE MATTER OF A COMMISSION INVESTIGATION INTO GAS UTILITY RESOURCE PLANNING

DOCKET NO. G008,G002,G011/ CI-23-117

COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Comments in response to the Commission's May 7, 2024 Notice of Extended Comment Period issued in the above-noted docket. This comment period follows the Commission's March 27, 2024 Order Establishing Framework for Natural Gas Utility Integrated Resource Planning (Framework Order) in the above noted docket. We appreciate this opportunity to present straw proposals for additional filing requirements that the Commission may choose to adopt for utility natural gas integrated resource plans (gas IRPs). As we stated in previous comments in this docket, we underscore the necessity of creating a flexible gas resource planning process that is designed to evolve as we learn, and our capabilities develop. It is important to incorporate flexibility into both the process and its requirements to facilitate an iterative and adaptive approach. The Framework Order provides essential flexibility and thorough direction for the utilities to develop gas IRPs. Therefore, while we offer additional context and our thoughts on various topics below for stakeholder feedback, we do not believe that the Commission needs to adopt a prescriptive filing requirement for every topic.

COMMENTS

I. WHAT, IF ANY, ADDITIONAL FILING REQUIREMENTS SHOULD THE COMMISSION ADOPT FOR NATURAL GAS INTEGRATED RESOURCE PLANS (GAS IRPS)?

Below, we offer straw proposals for additional filing requirements that the

Commission may consider for Gas IRPs in conjunction with Framework Order points. As requested by Commission staff in the comment notice, we offer recommended decision options for each Framework Order point addressed. If specific order points are not addressed, we believe no further clarification is needed.

A. Consideration of the State's economy-wide greenhouse gas reduction statutory goals.

Order Point 4 in the Framework Order requires that the scope of integrated resource planning consider the State's economy-wide greenhouse gas (GHG) reduction statutory goals.

At a high level, we propose to enable consideration of the state's statutory goals¹ by calculating emissions reductions based on in-state, anthropogenic emissions aligned with EPA reporting and other available data. We also propose to leverage lifecycle GHG emission factors from filed Natural Gas Innovation Act (NGIA) Plans in analysis to ensure resources result in lower emissions than conventional geologic natural gas on a lifecycle basis. Externality costs can then be considered in analysis along with the resulting emissions as described in other Order Points as further discussed below. Proposed plans should show total emission reductions using 2020 as the baseline year in alignment with NGIA.²

<u>Proposed decision option:</u> Consider the State's economy-wide greenhouse gas reduction statutory goals consistent with Minn. Stat. § 216H.01 and 216H.02 using 2020 as the baseline year. Lifecycle GHG emission factors from filed Natural Gas Innovation Act (NGIA) Plans can also be considered in resource analysis to ensure lower emissions on a lifecycle basis.

B. Treatment of energy efficiency alongside all other energy resource options.

Order Point 11 in the Framework Order establishes that "[e]nergy efficiency must be treated as an energy resource alongside all other energy resources. Energy efficiency should be included in the utility resource analysis and allowed to compete with supply-side and infrastructure resources to determine the optimal level of energy efficiency over the planning period."

We propose using the electric resource plan process to model energy efficiency as a

¹ Minn. Stat. §§ 216H.01 and 216H.02.

² Minn. Stat. § 216B.2427, Subd. 2(a)(4).

resource. Specifically, we would analyze multiple energy efficiency achievement scenarios: (1) base case scenario, (2) intermediate scenarios, and (3) maximum scenario. The expected impacts of energy efficiency program achievement at the spend levels included in the current Energy Conservation and Optimization (ECO) Plan would be reflected in the base case scenario. This includes the years included in the ECO Plan period, and a projection of the achievement and costs beyond the ECO Plan period.

The intermediate energy efficiency scenario(s) would include the incremental cost at higher or lower spending levels and the expected impact of resulting incremental achievement above or below the base case scenario. In these scenarios, spending increases or decreases at a higher pace than achievement as the increase or decrease includes changes rebate levels for the entire population of achievement, including those that are expected to participate in the base case scenario. This results in intermediate scenarios that vary in terms of \$/Dth from the base case scenario.

Finally, the maximum achievement scenario would include the incremental costs of a maximum spend level above the highest spend level of the intermediate scenarios. The maximum spend may be set at 100 percent of incremental capital costs (i.e., removes incremental costs to participants). If 100 percent of incremental capital costs scenario is cost-effective, levels of greater than 100 percent capital costs may be considered. This scenario would include the highest \$/Dth of all scenarios.

As identified in Framework Order Point 50, the preferred plan will include a five-year action plan. Energy efficiency program spend within each of five program years would be included to align with the action plan timeframe. This includes the lifetime energy savings for equipment installed through the programs, extending up to 20 years or further. Emission impacts would be calculated based on in-state, direct emissions as described in response to Order Point 4 – consideration of the State's economy-wide GHG reduction statutory goals.

<u>Proposed decision option:</u> To treat energy efficiency alongside all other energy resource options, utility integrated resource plans should evaluate energy efficiency achievement scenarios including expected program achievement to maximum achievement.

C. Appropriate and cost-effective level of future energy efficiency procurement

Order Point 12 in the Framework Order states that "[t]he analysis should provide utility-specific clarity about the appropriate and cost-effective level of future energy

efficiency procurement." In this analysis, if the maximum energy efficiency scenario is set at a spending level that is determined to be not cost-effective when compared to the supply-side alternatives, it ensures that the most cost-effective scenario is included in the intermediate scenarios.

<u>Proposed decision option:</u> The appropriate and cost-effective level of future energy efficiency procurement shall correspond to the maximum program spending level that remains cost-effective when compared to supply-side alternatives.

D. Environmental externality costs of resource options

Order Point 17 in the Framework Order directs utilities to estimate the environmental externality costs of resource options. We propose to align the source of the externalities with those used for ECO and NGIA to streamline consideration across natural gas planning and programs. This can be accomplished by tying externality cost assumptions to the Commission's January 26, 2024 Notice of Final EPA Report on the Social Cost of GHGs in Docket No. E-999/CI-14-643 or subsequent updates in that docket as referenced by the ECO and NGIA frameworks.³ We understand that as we file ECO and NGIA plans in the future they will use updated values creating opportunity for future alignment across gas IRP, ECO and NGIA. It is important that the Commission make consistent updates to externality values and directives across all planning and programs applicable to natural gas utilities.

<u>Proposed decision option:</u> To estimate environmental externality costs of resource options, utilities shall use the most recent externality values adopted by the Commission in Docket No. E-999/CI-14-643.

E. Additional analyses of scenarios and sensitivities in utility resource plans as directed by the Commission

Order Point 48 in the Framework Order states that "[u]tilities shall include additional analyses of scenarios and sensitivities in their resource plans as directed by the Commission." We recommend that initial utility integrated resource plans analyze the scenarios and sensitivities specified in Framework Order Points 45 and 46. Specifically, utilities shall analyze high, medium, and low load scenarios as well as high, medium, and low natural gas price sensitivities in their resource plans. This serves as a practical starting point for gas resource planning. The Commission may require additional scenarios and sensitivities as the process and our capabilities evolve over

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³ Order Establishing Frameworks for Implementing Minnesota's Natural Gas Innovation Act in Docket No. G-999/CI-21-566 at Order Point 28. (June 1, 2022).

time.

<u>Proposed decision option:</u> In initial integrated resource plans, utilities shall analyze scenarios and sensitivities as specified in the March 27, 2024 Order in this docket. The Commission may later order additional scenarios and sensitivities.

F. Five-Year Action Plan

Order Point 50 in the Framework Order indicates that a "natural gas utility's preferred plan should include both (1) a ten-year sales and emission forecast, and (2) a five-year action plan of specific steps that it will take to implement that plan over the next five years." We suggest providing additional high-level details on what would be included in the five-year action plan to level expectations. The Company proposes that the five-year action plan include justification of need, resource mix, project scope, construction timeline, and cost estimates.

<u>Proposed decision option:</u> The utility's preferred five-year action plan shall include justification of need, resource mix, project scope, construction timeline, and cost estimates.

G. Distribution system analysis

Order Points 51 through 54 in the Framework Order outline the scope for the Expansion Alternatives Analysis. Specifically, Order Point 51 states that "[u]tilities shall incorporate infrastructure costs related to resource expansion or new resources above an investment threshold to be established at a later date into the resource analysis and selection process." Below, we propose definitions and an investment threshold for the Expansion Alternatives Analysis.

1. Definitions

For clarity, we suggest definitions for key terms to implement Order Point 51 consistently. We offer suggested definitions for infrastructure costs and capacity expansion project, resource expansion, or new resources in the proposed decision option below.

<u>Proposed decision option:</u> For the purposes of the natural gas integrated resource plan distribution system analysis, infrastructure costs shall include capital costs the utility would pay to do the project. Capacity expansion project, resource expansion, or new resources shall include individual projects, or a set of inter-related facilities needed to meet a specified capacity expansion need due to growth by existing or new

customers and facilities. This excludes projects related to routine maintenance, public works accommodation, integrity, reliability, and safety.

2. Investment Threshold

As previously indicated, Order Point 51 states that utilities shall incorporate infrastructure costs related to resource expansion or new resources above an investment threshold to be established at a later date into the resource analysis and selection process. Further, Order Point 54 in the Framework Order specifies that utilities shall identify two to three significant upcoming distribution system projects for a full alternatives analysis in initial resource plans.

We propose an investment threshold of \$3 million, adjusted for inflation for each subsequent resource plan. This threshold captures our significant projects and provides consistency across our jurisdictions.⁴ The resource plans would include rationale for the projects above this threshold selected for the Expansion Alternatives Analysis.

<u>Proposed decision option:</u> For Xcel Energy, the distribution system analysis shall include infrastructure costs related to resource expansion or new resources above a \$3 million threshold, adjusted for inflation. The resource plan shall include a discussion of the rationale for the projects selected for an Expansion Alternatives Analysis.

II. THREE UTILITIES HAVE BEEN INSTRUCTED TO FILE GAS IRPS ON A STAGGERED FILING SCHEDULE. 5 WHICH UTILITY SHOULD FILE ITS PLAN FIRST AND WHY? WHEN SHOULD THAT PLAN BE FILED? WHEN SHOULD THE OTHER UTILITIES FILE THEIR PLANS?

Order Point 21 in the Framework Order directs utilities to file natural gas resource plans consistent with a staggered filing schedule. Further, the order point requires a new resource plan be 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.

As a dual utility with electric resource planning experience, Xcel Energy proposes to

⁵ 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.

⁴ Colorado Code of Regulations 723-4, Part 4, Rule 4551.

be the first utility to file a gas IRP. We anticipate being able to file our initial plan in late 2026. This timeline will provide us the needed time to secure additional tools and resources to develop the plan. Further, it allows us to incorporate data from the 2025-2026 heating season. Although this timing coincides with our next ECO triennial plan due date of June 1, 2026, the timing of subsequent resource plans will diverge based on the filing schedule outlined in Order Point 21.

III. FOR XCEL ENERGY, WHAT, IF ANY, DIRECTION SHOULD THE COMMISSION GIVE REGARDING XCEL'S ANALYSIS AND REPORTING ON METHANE EMISSIONS?

In its January 26, 2024 Order in our Performance Based Ratemaking (PBR) Docket No. E002/CI-17-401, the Commission moved the current methane emission reporting from the PBR docket to the Natural Gas Resource Plan dockets. Order Point 30 in the Framework Order requires each utility to submit an annual update on its most recently approved integrated resource plan. Xcel Energy recommends reporting methane emissions from natural gas distribution system operations in the annual gas IRP update or within the integrated resource plan during years when a plan is filed. To ensure accuracy and consistency, the methane emissions reporting should use recognized protocols, such as the Environmental Protection Agency's Mandatory Greenhouse Gas Reporting Rule, 40 CFR Part 98, Subpart W: Petroleum and Natural Gas Systems. Currently, adequate data on actual upstream emissions associated with purchased natural gas does not exist. If in the future this information becomes available reporting requirements can be assessed.

<u>Proposed decision option:</u> Xcel Energy shall report methane emissions from natural gas distribution system operations using recognized reporting protocols, such as 40 CFR Part 98, Subpart W, in the natural gas integrated resource plan and annual updates.

IV. ARE THERE ANY OTHER ISSUES OR CONCERNS RELATED TO THIS MATTER?

The Company has not identified any other issues or concerns related this matter at this time. We look forward to reviewing feedback to our straw proposals at the close of the initial comment period on June 28, 2024.

V. 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 TO BUILD INFRASTRUCTURE)
- 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).

Xcel Energy addressed the equity question in our November 30, 2023 Initial Comments on gas IRP scope, and we continued the equity discussion in our December 29, 2023 Reply Comments in this docket. Further, Order Point 27 in the Framework Order states that resource plans must provide an opportunity for public participation and comment, among other requirements. The Company remains committed to considering equity in our resource planning analysis and engaging stakeholders in our gas IRP process.

<u>Proposed decision option:</u> Integrated resource plans shall include a discussion of how equity was considered in the planning process.

VI. ESPECIALLY FOR MEMBERS OF THE PUBLIC AND GROUPS THAT INTERFACE WITH THE PUBLIC: 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)? 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?

We look forward to receiving feedback from stakeholders on these topics. The Company supports working with stakeholders to enhance community engagement. Similar to our electric resource plans, community input can be addressed in the resource plan to transparently detail community engagement efforts and feedback that may have influenced the plan, thus highlighting instances where workable solutions were suggested, analyzed, and implemented. We view the stakeholder engagement process as a collaborative process that will allow the Company to provide transparency and further insights into our planning practices.

CONCLUSION

In the May 7, 2024 Notice of Extended Comment Period, Commission staff requested that stakeholders recommend decision options at the end of their comments, when possible. Below, we re-state the proposed decision options discussed above. We look forward to receiving feedback from stakeholders.

Proposed decision options:

- 1. Consider the State's economy-wide greenhouse gas reduction statutory goals consistent with Minn. Stat. § 216H.01 and 216H.02 using 2020 as the baseline year. Lifecycle GHG emission factors from filed Natural Gas Innovation Act (NGIA) Plans can also be considered in resource analysis to ensure lower emissions on a lifecycle basis.
- 2. To treat energy efficiency alongside all other energy resource options, utility integrated resource plans should evaluate energy efficiency achievement scenarios including expected program achievement to maximum achievement.
- 3. The appropriate and cost-effective level of future energy efficiency procurement shall correspond to the maximum program spending level that remains cost-effective when compared to supply-side alternatives.
- 4. To estimate environmental externality costs of resource options, utilities shall use the most recent externality values adopted by the Commission in Docket No. E-999/CI-14-643.
- 5. In initial integrated resource plans, utilities shall analyze scenarios and sensitivities as specified in the March 27, 2024 Order in this docket. The Commission may later order additional scenarios and sensitivities.
- 6. The utility's preferred five-year action plan shall include justification of need, resource mix, project scope, construction timeline, and cost estimates.
- 7. For the purposes of the natural gas integrated resource plan distribution system analysis, infrastructure costs shall include capital costs the utility would pay to

- do the project. Capacity expansion project, resource expansion, or new resources shall include individual projects, or a set of inter-related facilities needed to meet a specified capacity expansion need due to growth by existing or new customers and facilities. This excludes projects related to routine maintenance, public works accommodation, integrity, reliability, and safety.
- 8. For Xcel Energy, the distribution system analysis shall include infrastructure costs related to resource expansion or new resources above a \$3 million threshold, adjusted for inflation. The resource plan shall include a discussion of the rationale for the projects selected for an Expansion Alternatives Analysis.
- 9. Xcel Energy shall report methane emissions from natural gas distribution system operations using recognized reporting protocols, such as 40 CFR Part 98, Subpart W, in the natural gas integrated resource plan and annual updates.
- 10. Integrated resource plans shall include a discussion of how equity was considered in the planning process.

Dated: May 31, 2024

Northern States Power Company

CERTIFICATE OF SERVICE

- I, Christine Schwartz, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.
 - <u>xx</u> 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. G008, G002, G011/CI-23-117

Dated this 31st day of May 2024

/s/

Christine Schwartz Regulatory Administrator

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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