

January 26, 2023

PUBLIC DOCUMENT

Will Seuffert
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-22-578

Dear Mr. Seuffert:

The Minnesota Department of Commerce, Division of Energy Resources (Department) attached its **PUBLIC** comments in the following matter:

In the Matter of the Petition of Northern States Power Company, doing business as Xcel Energy, for Approval of Gas Utilities Infrastructure Cost Rider (GUIC Rider) True-up Report for 2021, Updated Costs for 2022, Revenue Requirement for 2023, and Revised Adjustment Factors (Petition).

Lisa R. Peterson, Director, Regulatory Pricing & Analysis, with Xcel Energy filed the Petition on November 1, 2022.

The Department recommends the Minnesota Public Utilities Commission (Commission) **continue to allow Xcel Energy to recover eligible project costs in its GUIC Rider, with modifications.** The Department also recommends Xcel provide additional information in Reply Comments.

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

Sincerely,

/s/ FELICIA CULLEN
Financial Analyst

/s/ HOLLY SODERBECK
Financial Analyst

FC/HS/ar
Attachment

Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G002/M-22-578

I. BACKGROUND

[Minnesota Statutes § 216B.1635](#) established the Gas Utility Infrastructure Costs (GUIC) Recovery Rider. It allows natural gas utilities to commence recovery of certain qualifying projects between general rate cases. Eligible projects can constitute either replacement or modification of existing natural gas facilities and can include non-capital expenses such as surveys and assessments. Project expenses must meet the following requirements to be eligible for GUIC Rider recovery:

- Project costs must be incremental to costs already recovered in base rates;
- Projects cannot serve to increase revenues by connecting new customers to the system; and
- Projects cannot constitute a “betterment” to the system, unless the betterment is required by a political subdivision or federal or state agency.

On August 1, 2014, Northern States Power Company, d/b/a Xcel Energy (Xcel, Xcel Energy, or the Company), filed its inaugural [GUIC recovery petition](#) requesting approval to establish a rider, in Docket No. G002/M-14-336 (2015 GUIC Rider). On January 27, 2015, the Minnesota Public Utilities Commission (Commission) issued an [Order](#) approving Xcel Energy’s proposed 2015 GUIC Rider and tariff sheets with certain modifications.¹ The Commission also granted recovery of previously approved deferred costs² through the GUIC Rider, authorizing a five-year amortization recovery period for the GUIC-qualifying deferred expenditures.³

Since the initial filing, the Company has filed several GUIC Rider Petitions, and the Commission approved various modifications in the various proceedings.

On October 29, 2021, in Docket No. G002/M-21-765 (Docket 21-765), Xcel Energy filed its [Petition](#) for approval of its revenue requirement for 2022 and its 2021 true-up report. Xcel requested a 12-month recovering period, with rate factors effective beginning March 1, 2023.⁴ On November 4, 2021, the

¹ Attachment B of Xcel Energy’s February 6, 2015 [compliance filing](#) in Docket No. G002/M-14-336 shows a \$14.7 million revenue requirement for 2015. The final 2015 recovery rate was designed to recover the revenue requirement over an 11-month period, February 2015 – December 2015.

² Docket No. G002/M-10-422 (Minnesota Office of Pipeline Safety’s required sewer and gas line conflict remediation project) and Docket No. G002/M-12-248 (Xcel Energy’s Transmission- and Distribution- Integrity Management Program Initiatives, Commission [Order](#) dated January 28, 2013).

³ In the Matter of the Petition of Northern States Power Company, d/b/a Xcel Energy, for Approval of a Gas Utility Infrastructure Cost Rider, Docket No. G002/M-14-336, [Order Approving Rider with Modification](#) (January 27, 2015), p. 8.

⁴ Petition, p. 4.

Commission granted the Department's 180-day comment extension request. On December 16, 2021, Xcel filed [Corrections](#) to attachments C1(d) and C2 of its Petition. The Department filed [Comments](#) on March 31, 2022. Xcel Energy filed [Reply Comments](#) on June 13, 2022 and the Department [responded](#) on July 11, 2022. The Commission has not issued an Order in Docket 21-765.

For a table summarizing the history of Xcel's GUC Rider proceedings, see Department Attachment 1 to these Comments.

On November 1, 2022, Xcel Energy filed the instant Petition for approval of its revenue requirement for 2023, true-up report for 2021, updated costs for 2022, and revised adjustment factors ([2023 GUIC Rider](#)). Xcel Energy requested a 12-month recovery period, with rate factors effective beginning March 1, 2024, pending Commission approval.⁵

The Company is no longer including an adjustment to remove the GUIC Retirement Revenue Credits and Recovery in Base Rates for 2022 and 2023 included in prior GUIC petitions. The Company filed a gas rate case on November 1, 2022. In the Company's rate case filing and interim rate petition, all costs associated with these two items have been removed to reflect recovery in the GUIC rider or the retirements have been reset to the appropriate test year level.⁶

II. PETITION SUMMARY

The Company requested to recover \$37.5 million through the GUIC Rider as the 2023 revenue requirement.⁷ This is a 37% increase from the Company's requested 2022 revenue requirement of \$27.3 million.⁸

The Company's request includes integrity management project costs, which the Company incurred to continue promoting the safety of its natural gas system.⁹

A. PROPOSED RATE FACTORS

Xcel Energy proposed to assign the 2023 GUIC Rider total revenue requirements to its various customer classes in the same manner as revenue responsibilities were apportioned in the Company's 2020 natural gas rate case,¹⁰ consistent with the Commission's 2015-2020 GUIC Rider Orders.¹¹

⁵ Petition, p. 36.

⁶ Petition, p. 31.

⁷ Petition, p. 1.

⁸ Company's Petition in Docket No. G002/M-21-765, p. 1.

⁹ Petition, p. 1.

¹⁰ The Company's 2010 natural gas rate case is Docket No. G002/GR-09-1153. The Company also has an open natural gas general rate case (Docket No. G002/GR-21-678).

¹¹ Petition, p. 34.

The Company proposed an apportionment combining transportation customers with those customers' respective firm or interruptible sales classes, aligning the Company's rate design goal to remain indifferent to a customer's choice of sales or transportation services.¹² The Company first made this request in its 2022 GUIC Petition.¹³

The 2023 GUIC Rider's approximate bill impact is \$4.53 per month for an average residential natural gas customer.¹⁴

Table 1 and Chart 1 compare Xcel Energy's approved (2020 and 2021) and proposed (2022 and 2023) billing factors for each customer class.

Table 1: Xcel Energy's Prior, Proposed for 2022, and Proposed for 2023 GUIC Rate Factors¹⁵

GUIC Factor (\$/therm)					
Docket No.	19-664	20-799		21-765	22-578
GUIC Year	2020	2021		2022	2023
Residential	\$0.054649	\$0.033864	Residential	\$0.058886	\$0.062247
Commercial Firm	\$0.030639	\$0.018572	Commercial Firm	\$0.030854	\$0.038502
Commercial Demand Billed	\$0.031466	\$0.014666	Commercial Demand Billed	\$0.004626	\$0.005892
Interruptible	\$0.024520	\$0.010591	Interruptible	\$0.014235	\$0.015029
Transportation	\$0.004763	\$0.001602	---		
Revenue Requirement	\$25,770,000	\$25,800,000	---	\$33,800,000	\$37,500,000
File Date	Oct. 25, 2019	Oct. 23, 2022	---	Oct. 29, 2021	Nov. 1, 2022
Approval date	May 3, 2021	Nov. 18, 2022	---		
Effective Date or Proposed Effective Date	June 1, 2021 – Nov. 30, 2022	Dec. 1, 2022 – Feb 28, 2023	---	Mar. 1, 2023 – Feb. 29, 2024	Mar. 1, 2024 – Feb. 28, 2025

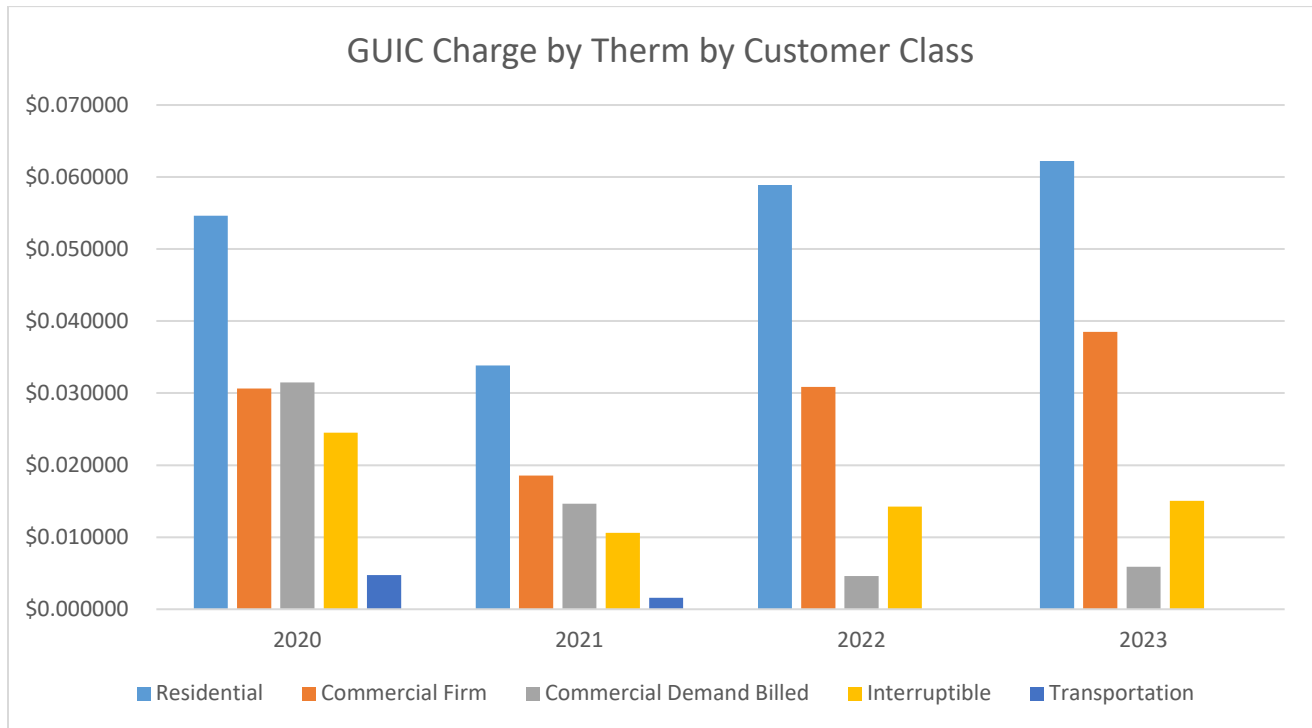
¹² Petition, p. 34.

¹³ Docket No. G002/M-21-765. The 2022 GUIC Petition is currently pending before the Commission.

¹⁴ Petition, p. 1.

¹⁵ Department Attachment 4 (DOC IR No. 6).

Chart 1¹⁶



B. PROPOSED REVENUE REQUIREMENT

The Company requested recovery of its \$37.5 million proposed 2023 GUIC revenue requirement¹⁷ over a 12-month period through a rider rate effective from March 1, 2024 to February 28, 2025.¹⁸ The proposed 2023 GUIC Rider revenue requirement equates to approximately 15.5% of the \$242.82 million base revenues included in the settlement for the pending natural gas rate case.¹⁹ By 2027, the GUIC Rider revenue requirement is projected to be \$51.1 million, or a 21% increase over the same pending base rate revenues.²⁰

The Company’s requested GUIC revenue requirement reflects cost recovery of its ongoing Transmission Management Program (TIMP) and Distribution Integrity Management Program (DIMP) project initiatives. The proposed revenue requirement can be broken down into three broad components: a capital-related revenue requirement, an operations & maintenance (O&M) revenue requirement, and adjustments (or offsets). Historically, the Company included a carryover balance from previous GUIC petitions in present-year petitions. In the instant petition, the Company did not include a carryover

¹⁶ Data from Comments, Table 1.

¹⁷ Petition, Table 7, p. 31.

¹⁸ Petition, p. 33.

¹⁹ Petition, p. 33.

²⁰ Petition, Attachment O. 21% = %51.1 million / \$242.82 million.

balance from 2022, but stated, it would update its 2023 request at a later date to include carryover balance from 2022, if required.²¹

- The Company's proposed capital-related revenue requirement includes depreciation, taxes, and a return on the Company's GUIC-specific rate base.²² The Company proposed to use the return on equity, capital structure, and rate of return agreed to in the unanimous settlement agreement in its pending natural gas general rate case.²³
- The Company's proposed O&M-related revenue requirement constitutes a return of GUIC-specific transmission and distribution annual operations and maintenance expenses (as opposed to a return on GUIC rate base). The revenue requirement includes both transmission (TIMP) and distribution (DIMP) programs, which are discussed in further detail below.
- The Company's proposed adjustments are internal capitalized costs, maximum allowable operating pressure (MAOP) projects and long-term debt rate of return, low-risk infrastructure, and prior-year disallowances.²⁴

The following table provides a high-level composition of the Company's proposed 2023 GUIC Rider revenue requirement compared to 2021 actuals and 2022 current forecast.

²¹ Petition, p. 4.

²² The GUIC-specific rate base is a representation of the Company's GUIC-specific capital expenditures. It includes GUIC-specific plant-in-service adjusted for accumulated depreciation and accumulated deferred taxes.

²³ Petition, p. 3. Company's ongoing general rate case is Docket No. G002/GR-21-678. [Comprehensive and Unanimous Settlement Agreement](#) at 3 (October 4, 2022).

²⁴ Petition, p. 31. In previous GUIC Rider petitions, the Company requested an adjustment to remove GUIC retirement revenue credits and recovery in rate base. However, all costs associated with these two items were reset with the ongoing general rate case and are no longer required.

Table 2: 2021-2023 GUIC Rider Revenue Requirement (\$ Millions)²⁵

	2021 Actuals ²⁶	2022 Current Forecast	2023 Forecast
Capital-Related Revenue Requirement			
TIMP	\$13.7	\$13.7	\$13.7
DIMP	\$16.5	\$22.2	\$26.0
Mandated Relocations	\$0.6	\$2.5	\$4.9
Total	\$30.8	\$38.4	\$44.6
O&M Expenses			
TIMP	\$0.6	\$0.1	\$0.6
DIMP	\$0.8	\$0.2	\$0.3
Total	\$1.4	\$0.3	\$0.8
Adjustments (Offsets)			
GUIC Retirement Revenue Credits	(\$0.7)	\$0.0	\$0.0
Annual Internal Capitalized Costs	(\$0.4)	(\$0.4)	(\$0.8)
MAOP Projects ²⁷	(\$1.7)	(\$1.7)	(\$1.8)
Low-Risk Infrastructure	(\$0.008)	(\$0.04)	(\$0.1)
Revenue Requirement in Base Rates	(\$0.8)	\$0.0	\$0.0
Prior-Year Disallowances	(\$3.1)	(\$4.0)	(\$5.1)
Subtotal	(\$6.7)	(\$6.1)	(\$7.8)
True-Up Carryover	\$0.2	\$1.2	\$0.0
Total GUIC Rider Revenue Requirement	\$25.8	\$33.8	\$37.5

The Company's requested GUIC revenue requirement reflects cost recovery of its ongoing Transmission Integrity Management Program (TIMP) and Distribution Integrity Management Program (DIMP) project initiatives, and mandated pipeline relocations required by public works activity, such as road construction.

²⁵ Petition, p. 31.

²⁶ Commission Order (November 17, 2022) and Company Compliance Filing (November 28, 2022) in Docket No. G002/M-20-799.

²⁷ At long-term debt rate of return.

In the following sections, the Department discusses these revenue requirement categories in the Company's 2023 GUIC recovery request:

- TIMP, including casing renewals
- DIMP, including casing renewals
- Mandated pipeline relocations
- Offset to revenue requirements

1. Transmission Integrity Management Program (TIMP)

In 2002, the U.S. Congress passed the Pipeline Safety Improvement Act, which directed the U.S. Department of Transportation (USDOT) to promulgate rules to address gas transmission pipeline integrity management. The Company established its TIMP to comply with Federal regulations.²⁸ The Company's TIMP projects identify risks, systematically perform health and condition assessments, and evaluate and prioritize preventative or corrective actions to mitigate identified risks and threats.²⁹

The Company's TIMP project activity includes assessing and improving the safety of its gas transmission system, which consists of approximately 70 miles of transmission pipeline in Minnesota.³⁰ Xcel Energy's TIMP project initiatives include:

- **Transmission Pipeline Assessments**, an ongoing program to assess the health and condition of gas transmission lines, including in-line inspection (ILI), pressure tests, and direct assessments. The Company expects to complete two ILI projects and no direct assessment projects in 2023.³¹ The Company has prepared 50.4 miles of transmission pipeline for an ILI tool assessment out of 65.5 miles of transmission pipeline in Minnesota. The Company has an additional 14.8 miles of transmission pipeline planned for ILI tool assessment preparation. The Company does not plan to assess 0.3 miles of transmission pipeline by ILI tools.³²
- **Programmatic Replacement and Maximum Allowable Operating Pressure (MAOP) Remediation Program**, the initiative strives to meet the requirements to have traceable, verifiable, and complete (TVC) records of a pipeline's MAOP. The Company validates existing MAOP records and remediates gaps in records.³³ The Company has two MAOP replacement projects scheduled for completion in 2023.

²⁸ [49 C.F.R § 192](#), Subpart O.

²⁹ Petition, p. 9.

³⁰ Petition, p. 9.

³¹ Petition, p. 11.

³² Department Attachment 5 (DOC IR No. 7).

³³ Petition, p. 12.

- **Casing Renewals**, a multi-year program started in 2021 to mitigate risks by renewing pipeline or installing equipment allowing testing to ensure isolation of pipelines from casings.³⁴

The following table provides the Company's requested 2023 capital expenditures and O&M costs, and overall revenue requirements for its TIMP projects.

Table 3: Estimated TIMP Project Costs 2023³⁵ (\$ Millions)

Program	2023 Capital	2023 O&M
Transmission Pipeline Assessments	\$0.26	\$0.63
Programmatic Replacement / MAOP Remediation	\$8.64	\$0.05
Casing Renewal	\$2.10	\$0.00
Total 2023 TIMP Expenditures	\$11.00	\$0.68
Total 2023 MN TIMP Revenue Requirement	\$13.67³⁶	\$0.55

2. *Distribution Integrity Management Program (DIMP)*

The Pipeline and Hazardous Materials Safety Administration (PHMSA) published DIMP rules establishing integrity management requirements for gas distribution pipeline systems in 2009.³⁷ The Company established its DIMP to comply with Federal regulations. The project is intended to help gas utilities identify, prioritize, and evaluate risks, implement measures to address risk, and validate the integrity of their gas distribution system.

The Company's DIMP project activity includes assessing and improving the safety of its distribution system located in Minnesota. The Company's current designated DIMP project initiatives include:

- **Poor Performing Main and Service Replacement**, an ongoing program to identify high- and medium-risk pipeline segments and prioritize replacement. The Company uses subject matter expertise, historical leak data, and industry information to identify risk factors that may lead to gas pipeline leaks or failures.³⁸
- **Distribution Pipeline Inspection and Replacement**, an ongoing program to conduct regular inspection of high- and medium-risk segments of pipeline to satisfy federal pipelines safety regulations.³⁹

³⁴ Petition, p. 13.

³⁵ Petition, Attachment C at 4.

³⁶ Capital costs represent the eligible calculated revenue requirements, which include debt and equity return on rate base, property taxes, current and deferred taxes, and book depreciation.

³⁷ [49 C.F.R. § 192, Subpart P.](#)

³⁸ Petition, p. 15.

³⁹ Petition, p. 17.

- **Distribution Valve Replacement Project**, a program to maintain the Company's ability to isolate sections of the system in case of emergency. This project includes adding, replacing, or otherwise rehabilitating existing distribution valves. A second aspect of the project is the installation of new valves, which began in 2021.⁴⁰
- **Casing Renewal**, a multi-year program, started in 2021, to mitigate risks by renewing pipeline or installing equipment that allows ongoing testing to ensure isolation of pipelines from casings.⁴¹

The following table provides the Company's requested 2023 capital expenditures and O&M costs, and overall revenue requirements for its DIMP projects.

Table 4: Estimated DIMP Project Costs 2023⁴² (\$ Millions)

Program	2023 Capital	2023 O&M
Poor Performing Main Replacements	\$18.57	\$0.00
Poor Performing Service Replacements	\$6.18	\$0.00
Intermediate Pressure (IP) Line Assessments/Replacements	\$1.69	\$0.25
Distribution Valve Replacement Project	\$0.37	\$0.00
Casing Renewal	\$1.67	\$0.00
Total 2023 TIMP Expenditures	\$28.48	\$0.25
Total 2023 MN TIMP Revenue Requirement	\$25.97	\$0.25

3. Mandated Relocations

The Company's mandated relocation program is dedicated to moving existing infrastructure to meet federal, state, or local requirements. The Company began including mandated relocations as a GUIC project in 2021. Minn. Stat. § 216B.1635, subd. 1(c)(1), provides one (of two) definition of a gas utility project which may be included as a GUIC project:

Replacement of natural gas facilities located in the public right-of-way required by the construction or improvement of a highway, road, street, public building, or other public work by or on behalf of the United States, the state of Minnesota, or a political subdivision.⁴³

⁴⁰ Petition, p. 19.

⁴¹ Petition, p. 19.

⁴² Petition, Attachment D at 4.

⁴³ Minn. Stat. § 216B.1635, subd. 1(c) provides two definitions for gas utility projects. (1), listed here, is one of the two definitions.

The Company's estimated mandated relocation project costs include projects in Inver Grove Heights, Maplewood, May Township, St. Paul, and Stillwater. The Company stated one project for Washington County Road 5 reconstruction project was initially expected to be completed in 2021 or 2022, but now has been pushed back to 2023 or possibly 2024. The Company also budgeted for several other mandated relocation projects in 2023, with each project typically having a cost less than \$0.3 million, but no indication of the number of additional projects.⁴⁴

The following table lists the expected capital expenditures, O&M expenses, and revenue requirement for mandated relocation project costs in 2023.

Table 5: 2023 Estimated Mandated Relocation Project Costs (\$ Millions)⁴⁵

Mandated Relocation Program	2023 Capital	2023 O&M
Total 2023 Capital Expenditures and O&M	\$14.9	\$0.00
Total 2023 MN Revenue Requirement	\$4.92	\$0.00

The Company stated, "We estimate the total capital expenditures we are asking to recover in the GUIC Rider will be approximately \$8.2 million in 2023."⁴⁶ However, this statement was an error related to base rates approved in a previous rate case. The interim rates currently in effect, and included in the settlement agreement in the pending rate case, no longer include any recovery for mandated relocations. The Company proposed recovering all mandated relocation costs through the GUIC Rider going forward.⁴⁷

The Company also stated it expects to be reimbursed for the costs related to work to relocate infrastructure around the Metro Transit Gold Line construction.⁴⁸ The Company anticipates being reimbursed for most, if not all of the estimated capital expenditures of \$4.9 million related to the Metro Transit Gold Line project.⁴⁹ **The Department recommends the Commission require the Company to report reimbursements as offsets to total revenue requirements in future true-up filings.**

4. Offsets to GUIC Rider Revenue Requirements

Minn. Stat. § 216B.1635, limits GUIC Rider recovery to only allow recovery for costs incremental to those already reflected in base rates. The Company offsets base rate revenue requirements to account for costs already being recovered through existing rates. Given the ongoing rate case (Docket No.

⁴⁴ Petition, p. 20.

⁴⁵ Attachment D at 27.

⁴⁶ Petition, p. 21.

⁴⁷ Department Attachment 7 (DOC IR No. 9).

⁴⁸ Petition, p. 20.

⁴⁹ Department Attachment No. 8 (DOC IR No. 10).

G002/GR-21-678), the Company no longer needs to make an adjustment for GUIC Retirement Revenue Credits or Revenue Requirement in Base Rates.⁵⁰

The Company reduces its 2023 GUIC Rider revenue requirement by:⁵¹

[TRADE SECRET DATA HAS BEEN EXCISED]

C. STATUS OF GUIC STATUTE

As the Company notes, the GUIC Statute (Minn. Stat. § 216B.1635) expires June 30, 2023. The Company identified two questions regarding the statute expiration:⁵²

1. After June 30, 2023, what happens to pending GUIC requests? And
2. After June 30, 2023, what happens to recovery of GUIC-related costs?

Regarding the Company's first question: The Company concludes the Commission is free to consider GUIC requests at any time, so long as they are filed before the statute expires. The Company believes it would be imprudent to agree to time extensions in this docket if no further GUIC decisions could be made after June 30, 2023, and that deadline would not afford the Commission and stakeholders sufficient time to thoroughly evaluate the request. The Company also believes the Company is authorized to request approval of costs through the end of 2023 and continue the use of the GUIC Rider mechanism until all the GUIC costs through 2023 are recovered.⁵³

The Company quoted the Department's [Response to Reply Comments](#) (July 11, 2022) in Docket No. G002/M-21-765 as support for the Company's interpretation of the statute.⁵⁴ The Department addresses this issue in the Department Analysis section of these comments.

With regards to the Company's second question, the Company stated it believes the Commission should consider allowing for the continued use of the GUIC Rider beyond the expiration date of the statute.⁵⁵

⁵⁰ Petition, p. 31.

⁵¹ Department Attachment 2 (RIS-Reg Treatment TS document from Company spreadsheet).

⁵² Petition, p. 40.

⁵³ Petition, p. 40.

⁵⁴ Petition, p. 41.

⁵⁵ Petition, p. 42.

III. DEPARTMENT ANALYSIS

In this section, the Department provides an overview discussion of the following topics:

- A. Statutory background and filing requirements
- B. Project eligibility
- C. Commission filing requirements
- D. Timing of 2023 GUIC Rider recovery
- E. 2021 and 2022 GUIC Rider dockets

A. STATUTORY BACKGROUND AND FILING REQUIREMENTS

Generally, a public utility may not change its rates without undergoing a general rate case in which the Commission comprehensively reviews the utility's costs and revenues. The Minnesota State Legislature created exceptions to this general policy, allowing a utility to implement specific riders with rate-adjustment mechanisms to expedite recovery of certain costs not reflected in the utility's current base rates.

Minn. Stat. § 216B.1635 allows utilities to seek rider recovery of gas utility infrastructure costs, which are costs *not* included in the gas utility's rate base in its most recent general rate case, which the utility incurred from gas infrastructure projects involving:

- (1) The replacement of natural gas facilities required by road construction or other public work by or on behalf of a government agency, and
- (2) The replacement or modification of existing facilities required by federal or state agency, including incremental costs of surveys, assessments, reassessments, and other work necessary to determine the need for replacement or modification of existing infrastructure.⁵⁶

The Department notes the Commission interpreted the GUIC statute in its January 27, 2015 [Order](#) in Docket No. G002/M-14-336. The Commission determined gas infrastructure projects as eligible for recovery under Minn. Stat. § 216B.1635 if *either* subpart (1) or (2) are satisfied. Projects constituting a "betterment" do not qualify for rider recovery unless the betterment is "based on" requirements by a political subdivision or a federal or state agency.⁵⁷

A utility seeking approval of a GUIC Rider must file a petition with the Commission detailing the projects and costs proposed for recovery.⁵⁸ The Petition for rate recovery is for incremental costs only.⁵⁹ The

⁵⁶ [Minn. Stat. § 216B.1635](#), subd. 1(b), (c).

⁵⁷ Minn. Stat. § 216B.1635, subd. 1(b)(3).

⁵⁸ Minn. Stat. § 216B.1635, subd. 2-3.

⁵⁹ Minn. Stat. § 216B.1635, subd. 2.

utility must file sufficient information to satisfy the Commission regarding the reasonableness of the proposed gas utility infrastructure costs, including, but not limited to:

- Project description, scope, estimated costs, and in-service date;⁶⁰
- The government entity ordering or requiring the project and the purpose of the project;⁶¹
- A description of the estimated costs and salvage value, if any, associated with the existing infrastructure replaced or modified as a result of the project;⁶²
- A comparison of the utility's estimated costs and the actual costs incurred, including a description of the utility's efforts to ensure the costs of the facilities are reasonable and prudently incurred;⁶³
- Calculations to establish the rate adjustment is consistent with the terms of the rate schedule, including the proposed rate design and an explanation of why the proposed rate design is in the public interest;⁶⁴
- The magnitude and timing of any known future projects the utility may seek to recover under the GUIC statute;⁶⁵
- The magnitude of the costs in relation to the utility's base revenue as approved by the Commission in the utility's most recent general rate case, exclusive of gas-purchase costs and transportation charges;⁶⁶
- The magnitude of the costs in relation to the utility's capital expenditures since its most recent general rate case;⁶⁷ and
- The amount of time since the utility last filed a general rate case and the utility's reason for seeking recovery outside a general rate case.⁶⁸

The Commission may approve a GUIC Rider if the costs proposed for recovery through the rider are prudently incurred and achieve gas facility improvements at the lowest reasonable and prudent costs to ratepayers.⁶⁹ Costs eligible for rider recovery include a rate of return, income taxes on the rate of return, incremental property taxes, incremental depreciation expense, and incremental operation and maintenance costs.⁷⁰

⁶⁰ Petition Attachment C and C1 (TIMP), Attachments D and D1 (DIMP), and Attachments D and E for mandated relocations.

⁶¹ Petition Attachment C1 (TIMP), D1 (DIMP), and E (mandated relocations).

⁶² Petition Attachment J and Petition Table 8, p. 32.

⁶³ Petition Attachments C (TIMP) and D (DIMP).

⁶⁴ Petition, pp. 21-24 and 33-36; Petition Attachments F, G, H, K, O, P, Q, and R.

⁶⁵ Petition Attachment C1 (TIMP higher-level summary of magnitude), Attachments C and F for TIMP timing of costs through 2026; Attachment D1 (DIMP higher-level summary of magnitude), Attachments D and F for DIMP timing of costs; Attachment F for higher-level information of magnitude and timing of mandated relocations, Attachments D and E for magnitude and timing for mandated relocations.

⁶⁶ Petition, p. 33 and Attachment M; Department Attachment 9 (DOC IR No. 3).

⁶⁷ Petition, p. 33 and Attachment M; Department Attachment 9 (DOC IR No. 3).

⁶⁸ Petition, pp. 6-9, 21-29, 30.

⁶⁹ Minn. Stat. § 216B.1635, subd. 5.

⁷⁰ Minn. Stat. § 216B.1635, subd. 2, 4.

The Company included a compliance matrix in Attachment A of the instant Petition, which lists the filing requirements specified in Minn. Stat. § 216B.1635 and in prior Commission orders. The compliance matrix identifies specific projects in the Petition attachments.

The Department concludes the Company's filing reasonably complies with the statutory filing requirements.

B. PROJECT ELIGIBILITY

Gas utility infrastructure projects required by road construction or other public works, by or on behalf of, a government agency, or that are required by a federal or state agency are eligible for GUIC Rider recovery.⁷¹ By Commission [Order](#), the Company is required to disclose the agency, regulation, or order that requires the Company's proposed projects in its petitions.⁷² The Company provided the required disclosures in Attachments C and C1 for TIMP program; Attachments D and D1 for DIMP program; and Attachments D and E for mandated relocations. The Petition includes projects previously approved for recovery in earlier GUIC filings.

The Company's existing and ongoing GUIC initiatives include the following:

TIMP
Transmission Pipeline Assessments
Programmatic Replacement / MAOP Remediation
Casing Renewal
DIMP
Poor Performing Main and Service Replacement
Intermediate Pressure (IP) Line Assessment / Replacement
Distribution Valve Replacement Project
Casing Renewal
Mandated Relocations

The Company first requested recovery through the GUIC Rider for its casing renewals project and mandated pipeline relocations in its 2021 revenue requirement request (Docket No. G002/M-20-799). The Commission recently approved these projects in its November 18, 2022 [Order](#). The Commission previously reviewed and approved the continuing initiatives included in the instant Petition. Absent new information, the Department generally concludes the existing initiatives remain eligible for GUIC recovery.

⁷¹ Minn. Stat. § 216B.1635, subd. 5.

⁷² *In the Matter of the Petition of Northern States Power Company, d/b/a/ Xcel Energy, for Approval of a Gas Utility Infrastructure Cost Rider True-Up Report for 2016, Forecasted 2017 Revenue Requirement, and Revised Adjustment Factor*, [ORDER APPROVING RIDER WITH MODIFICATIONS](#) (February 8, 2018) in Docket No. G002/M-16-891.

The Company confirmed it removed costs related to low-risk infrastructure replacement not mandated by government regulations or public work requirements.⁷³

C. COMMISSION FILING REQUIREMENTS

In various prior GUIC filings, the Commission directed the Company to include or refine certain information in subsequent filings. The Company summarized cumulative petitions' requirements in a compliance matrix (Petition, Attachment A). The Department agrees the Company appears to have met the requirements listed in the compliance matrix.

D. TIMING OF 2023 GUIC RIDER RECOVERY

The Company proposed to implement the 2023 GUIC Rider factors effective March 1, 2024.⁷⁴ The proposed implementation date and recovery period is consistent with the timing of the 2022⁷⁵ GUIC rate, which may allow for more stable factors and eliminate the need for the proration of accumulated deferred income tax (ADIT). The Department supports the Company's proposed timing.

E. 2021 AND 2022 GUIC RIDER DOCKETS

The Commission issued its Order in the Company's 2021 GUIC Rider request on November 17, 2022.⁷⁶ The Company filed the instant Petition for 2023 GUIC Rider recovery on November 1, 2022, prior to the Commission's Order in the 2021 GUIC Rider petition, but after verbal approval of the petition.

On October 29, 2021, the Company [requested approval](#) of a 2022 GUIC Rider to recover the 2022 revenue requirement in its prior year (2021) true-up (Docket No. G002/M-21-765). On May 31, 2022, the Department filed [Comments](#), requesting the Company provide additional information in Reply Comments. The Company filed [Reply Comments](#) on June 13, 2022 and the Department filed a [Response](#) on July 11, 2022. The Commission has not issued an order in Docket No. G002/M-21-765.

As stated in the instant Petition, the Company will carryover any needed adjustments from the resolution of its 2022 request in its 2023 request.⁷⁷

⁷³ Petition, Attachment A, p. 8 of 11, Petition Requirement 7. Commission Order (January 9, 2020) in Docket No. G002/M-18-692.

⁷⁴ Petition, p. 5.

⁷⁵ The proposed timing for the 2022 GUIC rate is March 1, 2023 (Docket No. G002/M-21-765, [Petition](#), p. 4). However, the Commission has not yet heard the 2022 docket.

⁷⁶ Docket No. G002/M-20-799, which the Commission heard at its October 27, 2022 Agenda Meeting.

⁷⁷ Petition, p. 4.

IV. DEPARTMENT CONCERNS

The Department conducted its review of the Company’s Petition and prior Commission Orders. The Department discussed the following concerns with the Company’s proposal:

- Delayed Projects
- Revenue Apportionment
- Reconciliation with 2021 General Rate Case
- Risk Assessment and Performance Metrics

A. DELAYED PROJECTS

The Company provided four projects related to poor performing main and service replacements no longer included in the 2023 scope of work.⁷⁸ The following table lists the delayed projects.

Table 6: Delayed Projects⁷⁹

City	Description	Estimated Services	Estimated Cost	Estimated Footage	Estimated Main Cost	Reason for Delay
Roseville	Larpenteur Ave W	10	\$18,591	2,320	\$136,300	City postponed until 2024
Mounds View	County Rd I	2	\$3,718	301	\$17,684	County postponed roadwork, no estimated start date
Mounds View	County Rd H	10	\$18,591	1,404	\$82,485	County postponed roadwork, no estimated start date
New Brighton	Forest Dale Rd	49	\$91,098	5,200	\$305,500	City postponed until 2026

The Department requests the Company provide updated financial schedules in its Reply Comments, removing these delayed projects, and any other delayed or cancelled projects.

B. REVENUE APPORTIONMENT

The Company proposed apportionment combining transportation customers with their respective firm or interruptible sales class. The Company stated, “This aligns with our rate design goal to remain indifferent to customer’s choice of sales or transportation service.”⁸⁰

⁷⁸ Department Attachment 6 (DOC IR No. 8).

⁷⁹ Petition Attachment D1(c), delayed projects only, provided in Department Attachment 6 (DOC IR No. 8).

⁸⁰ Petition, p. 34.

The Company first proposed this apportionment in its previous GUIC Rider Petition (Docket No. G002/M-21-765). The Company stated:

This approach to apportionment proposed in the Company's pending natural gas rate case (Docket No. G002/GR-21-678) is consistent with the apportionment proposed in our GUIC Rider Petition. As we mentioned in the Petition, our proposed revenue apportionment is based on the recently filed October 4, 2022 Settlement Agreement in the Company's current natural gas rate case. The Company will update this apportionment once the Company files its final rates compliance filing in the current rate case.⁸¹

The following table provides the current and proposed revenue apportionment.

Table 7: Current vs. Proposed Revenue Apportionment⁸²

Class	Current Allocator	Class	Proposed Allocator
Residential	67.2244%	Residential	64.0327%
Commercial Firm	21.2597%	Commercial Firm	23.8945%
Commercial Demand-Billed	2.1010%	Commercial Demand-Billed	6.5583%
Interruptible	5.6521%	Interruptible	5.5144%
Transport	3.7628%	N/A	N/A
Total	100.0000%	Total	99.9999%

The Company used actual sales data in its 2023 GUIC Factor calculation.⁸³ The Department continues to support using actual sales data, aligning with previous Commission decisions.

Provided the Company updates its apportionment in its final rates compliance filing in the current rate case, the Department does not oppose the updated apportionment since the Company based it on the apportionment in its current rate case.

C. RECONCILIATION WITH 2021 GENERAL RATE CASE

The Company has an open general rate case (2021 rate case) with Docket No. G002/GR-21-678, in which the Company filed a [comprehensive and unanimous settlement agreement](#) on October 4, 2022. The revenue collection estimates using the sales information based on a proposed 2023 GUIC Rider rate generates \$37.5 million of GUIC Rider-related revenues from March 1, 2024 to February 28, 2025.⁸⁴

⁸¹ Department Attachment 3.

⁸² Petition, p. 35.

⁸³ Petition, p. 35.

⁸⁴ Petition, p. 33.

As part of the 2021 rate case, the Company proposed to move part of the revenue requirements for the GUIC Rider to base rates when final base rates are implemented in the rate case. The proposed rider roll-in includes the revenue requirement for all GUIC Rider capital projects forecasted to be in service prior to December 31, 2021. No costs included in the instant Petition were included in the Company's interim rate request, preventing double recovery between interim rates and the GUIC rider.⁸⁵

To correctly roll rider costs into base rates, a utility can either perform a reconciliation of accounts on the front end or on the back end of the rate case analysis. Since Xcel did not account for GUIC costs on the front end of its rate case, the Department expects GUIC costs to be trued up on the back end. This will require a corrective adjustment in the Company's interim rate refund calculation to ensure the Company does not double collect its revenue requirements. The Department expects after specific GUIC costs are correctly rolled into the Company's base rates, the Company will discontinue collecting these costs in their GUIC Rider effective with the implementation of final rates.

D. RISK ASSESSMENT AND PERFORMANCE METRICS

The risk assessment and performance metrics tools help determine the reasonableness of GUIC investments. Risk assessment is prospective, and these tools help the Commission evaluate specific projects utilities expect to undertake in the upcoming year. Performance metrics are retrospective evaluations and help the Commission determine the reasonableness of Xcel Energy's achievements once projects are completed.

1. Risk Assessment

In the Company's instant filing, the Company applies risk assessment tools to projected 2023 projects.⁸⁶ Risk assessment tools in the instant Petition are similar to those in the Petition for Docket No. G002/M-21-765.

2. Performance Metrics

In the Company's instant filing, the Company's recommended performance metrics are similar to those in the Petition for Docket No. G002/M-21-765.⁸⁷

In the Commission's November 18, 2022 [Order](#) in Docket No. G002/M-20-799, the Commission "permitted use of additional Performance Metrics, as proposed in Xcel Energy's [Reply Comments](#), with the addition of the casing renewal effectiveness metric recommended by the Department in its

⁸⁵ Petition, p. 3.

⁸⁶ Petition, Attachments C2, D2(a), and D2(b).

⁸⁷ Petition, Attachment U.

[Response](#). Xcel shall report on the cost metric for the casing renewal program in its reply comments to the 2023 GUIC filing.”⁸⁸

The Department requests the Company report on the cost metric for the casing renewal program in its Reply Comments as required by Order.

E. SUNSETTING PROVISION OF THE GUIC STATUTE

[Minn. Stat. § 216B.1635](#) is expiring June 30, 2023, absent action from the Minnesota Legislature extending the statute.

The Company stated, “As this proposal is being filed before the expiration of the statute, we believe that this docket can move forward like previous GUIC Rider filings and that the Commission is authorized to approve recovery of the full amount of 2023 GUIC costs included in this request. Considering the GUIC statute’s anticipated expiration, however, we want to continue the policy discussion started earlier this year.”⁸⁹ In Section XI of its Petition (pages 40 – 42), the Company summarized its opinion related to the expiring statute. The Company believes the Commission is free to consider GUIC requests at any time so long as they are filed before the statute expires. The Company also cited the Department from its Comments in the 2022 GUIC Rider docket:

Under such a course of events [i.e., the expiration of the GUIC statute], Xcel could file a GUIC Rider petition for recovery of 2023 costs in next year’s filing; the subsequent year, the Company could simply file a true up of 2023 expenses. In this scenario, the GUIC rider would remain in place for 2024, but would only reflect any 2023 over-or-under recoveries. All post-2023 expenses that might otherwise be reported in the Company’s GUIC tracker would instead simply be moved to its tracker for general rates.⁹⁰

The Department believes if the Commission approves a GUIC Rider petition by June 30, 2023, the statute’s expiration date, the Commission is within the statutory authority. After further consideration, the Department does not believe the Company could file a true-up in a subsequent GUIC Rider Petition for the Commission to consider after June 30, 2023. The Commission may approve another alternative, such as deferred accounting or another mechanism to approve the true-up within its statutory authority.

The Minnesota Legislature is currently in-session for the 2023 legislative session. The Department will continue to monitor the statute expiration.

⁸⁸ Commission Order at 2 (November 18, 2022) in Docket No. G002/M-20-799. Reference omitted.

⁸⁹ Petition, pp. 2-3.

⁹⁰ Petition, p. 41.

V. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

The Department appreciates the opportunity to comment on the Company's GUIC Rider Petition.

Based on our review, the Department concludes the Company's petition is generally reasonable, except for the inclusion of delayed or cancelled projects. The Department requests the Company provide, in its Reply Comments:

- updated financial schedules, removing delayed or cancelled projects; and
- a report on the cost metric for the casing renewal program.

The Department recommends the Commission take the following actions:

- Approve the Company's proposed 2023 GUIC Rider factor, updated to remove delayed or cancelled projects.
- Require the Company to provide true-up information for 2021, 2022, and 2023, once known, using deferred accounting or an alternative mechanism.
- Require the Company to report reimbursements as offsets in future true-up filings.
- Require the Company to provide a compliance filing, based on Commission decisions, within 10 days of Commission Order, including electronic files with formulae intact of the revenue requirement and corresponding rate factor schedules.

The Department is available for any questions the Commission may have.

Table 1: Xcel Energy’s GUIC Petitions

Docket No.	Petition	Petition Date	Commission Order	Commission Order Date	GUIC Rider effective dates
G002/M-14-336	Inaugural GUIC recovery petition. Requesting approval to establish Rider for 2015.	8/1/2014	Approved Rider, with modifications. Granted recovery of previously approved deferred costs through the Rider. Authorized a five-year amortization recovery period for the GUIC-qualifying deferred expenditures.	1/27/2015	February 2015 – August 2016
G002/M-15-808	Petition for approval of 2016 GUIC revenue requirement and prior year true-up.	10/30/2015	Approved rider recovery. Required metrics to evaluate GUIC expenditures. Required an updated report.	8/18/2016	September 2016 – February 2018
G002/M-16-891	Petition for approval of 2017 GUIC revenue requirement and prior year true-up.	11/1/2016	Approved Rider with modifications.	2/8/2018	March 2018 – August 2019
G002/M-17-787	Petition for 2018 GUIC revenue requirement and prior year true-up.	11/1/2017	Authorized Rider recovery and set reporting requirements.	8/12/2019	September 2019 - February 2020
G002/M-18-692	Petition for 2019 GUIC revenue requirement and prior year true-up.	11/1/2018	Authorized Rider recovery with modifications	1/9/2020	March 2020 - May 2021
G002/M-19-664	Petition for 2020 revenue requirement and prior year true-up.	10/25/2019	Approved Rider with modifications.	5/3/2021	June 2021 – November 2022
G002/M-20-799	Petition for 2021 revenue requirement and prior year true-up	10/23/2020	Approved Rider recovery with modifications	11/18/2022	December 1, 2022 - tbd
G002/M-21-765	Petition for 2022 revenue requirement, true-up report for 2020, and updated costs for 2021	10/29/2021	Pending	Pending	Pending

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Xcel Energy Information Request No. 5
Docket No.: G002/M-22-578
Response To: Minnesota Department of Commerce
Requestor: Felicia Cullen, Holly Soderbeck
Date Received: November 14, 2022

Question:

Topic: Proposed apportionment
Reference(s): Petition, p. 34

Petition, p. 34 states, “As we did in last year’s petition, the Company is proposing apportionment that combines transportation customers with their respective firm or interruptible sales classes. This aligns with our rate design goal to remain indifferent to customer’s choice of sales or transportation service.”

- A. Please explain if the proposed apportionment in the Petition is also proposed in the Company’s open rate case in Docket No. G002/GR-21-678.
- B. Please explain how the proposed apportionment better aligns with the Company’s rate design goal.

Response:

- A. The approach to apportionment proposed in the Company’s pending natural gas rate case (Docket No. G002/GR-21-678) is consistent with the apportionment proposed in our GUIC Rider Petition. As we mentioned in the Petition, our proposed revenue apportionment is based on the recently filed October 4, 2022 Settlement Agreement in the Company’s current natural gas rate case. The Company will update this apportionment once the Company files its final rates compliance filing in the current rate case.
- B. One of the Company’s rate design goals is to remain indifferent to a customer’s choice regarding gas supplier. The underlying cost to serve a similarly sized customer is the same whether the customer uses system gas or procures gas through their own gas supplier. Currently, customers on our transportation services pay a lower rate for the GUIC Rider than they would under the corresponding Demand and Interruptible

classes' GUIC Rider rates. The Company's proposal of combining Transportation customers with their respective firm or Interruptible sales classes would allow customers to pay the same GUIC Rider rate whether they are a Sales or Transportation customer, thus making us indifferent to the type of service they take. Further, whether a customer takes transportation service or sales service has no bearing on cost assignment of the GUIC investments, and a customer of a given size and service type should not pay a different amount for GUIC investments based on whether their gas supplier is Xcel Energy or another entity. Finally, the impact of combining the Transportation customers with the corresponding sales services is that it lowers the GUIC Rider rates for the Demand and Interruptible classes.

Preparer: Christopher Barthol
Title: Principal Pricing Analyst
Department: NSPM Regulatory
Telephone: (612) 321-3237
Date: November 23, 2022

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Xcel Energy Information Request No. 6
 Docket No.: G002/M-22-578
 Response To: Minnesota Department of Commerce
 Requestor: Felicia Cullen, Holly Soderbeck
 Date Received: December 29, 2022

Question:

Topic: 2021 Rider Factors/Current Factors
 Reference(s): Petition, Table 10 at 35 and 11/28/2022 Compliance Filing in
 Docket No. G002/M-20-799

- A. Please explain why the current factors listed in Table 10 on page 35 of the instant petition do not match column E in the Company’s 11/28/2022 compliance filing in Docket No. G002/M-20-799.

Response:

The factors are different due to the timing of the two filings. The current factors shown in Table 10 of the instant petition filing reflect the rates approved for the 2020 GUIC revenue requirement in Docket No. G002/M-19-664. These rates were effective at the time the instant petition in Docket No. G002/M-22-578 was filed on November 1, 2022. Final compliance in Docket No. G002/M-20-799 was filed on November 28, 2022, and column E reflects factors for the 2021 GUIC revenue requirement. The table below shows the proposed timing of factors across the GUIC dockets.

GUIC Factors (\$/therm)

Docket No.	19-664	20-799	21-765	22-578
GUIC year	2020	2021	2022	2023
Residential	0.033864	0.054649	0.058859	0.062247
Comm Firm	0.018572	0.030639	0.030854	0.038502
Demand	0.014666	0.031466	0.004626	0.005892
Interruptible	0.010591	0.024520	0.014235	0.015029
Transport	0.001602	0.004763		
File Date	Oct 25, 2019	Oct 23, 2020	Oct 29, 2021	Nov 1, 2022
Approval Date	May 3, 2021	Nov 18, 2022		
Effective Date or Proposed Effective Date	Jun 1, 2021 – Nov 30, 2022	Dec 1, 2022 – Feb 28, 2023	Mar 1, 2023 – Feb 29, 2024	Mar 1, 2024 – Feb 28, 2025

Preparer: Christopher Barthol
Title: Rate Consultant
Department: Regulatory
Telephone: 612-321-3237
Date: January 9, 2023

Mary Pope
Senior Rate Analyst
Revenue Requirements North
612-330-6574

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Xcel Energy Information Request No. 7
Docket No.: G002/M-22-578
Response To: Minnesota Department of Commerce
Requestor: Felicia Cullen, Holly Soderbeck
Date Received: December 29, 2022

Question:

Topic: TIMP, transmission integrity assessments
Reference(s): Petition, pp. 10-12

The Company states, “After an initial capital investment to prepare a pipeline for an ILI [In Line Inspection] tool, subsequent assessments will be performed using ILI as an operations and maintenance cost.” (Petition, p. 11).

- A. How many miles of transmission pipeline has the Company prepared for an ILI tool?
B. How many miles of transmission pipeline is not prepared for an ILI tool?

Response:

- A. The Company has prepared 50.4 miles of transmission pipeline for an ILI tool assessment out of 65.5 miles of transmission pipeline in Minnesota.
- B. The Company has an additional 14.8 miles of transmission pipeline that is planned to be prepared for ILI tool assessment. There are 0.3 miles of transmission pipeline that are not planned to be assessed by ILI tools. Not all pipelines are able to be assessed by ILI tools. Common limitations in ILI tool assessment are pipeline diameters less than 6-inches and gas flow rates and pressures that are insufficient to move the tool through the pipe.
-

Preparer: Rick Gonzales
Title: Manager, Gas Transmission Integrity Management
Department: Gas Engineering
Telephone: (303) 285-6470
Date: January 9, 2023

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Xcel Energy Information Request No. 8
Docket No.: G002/M-22-578
Response To: Minnesota Department of Commerce
Requestor: Felicia Cullen, Holly Soderbeck
Date Received: December 29, 2022

Question:

Topic: Projects
Reference(s): Petition

- A. Has the Company canceled any of the projects listed in the Petition since the Petition was filed on November 1, 2022?

Response:

As described below, there are projects that are not canceled, but rather shifted from 2023 to a future year for completion.

Poor Performing Main & Service Replacements

Of the projects discussed on pages 5-7 of Petition Attachment D, there are four projects, listed on page 1 of Attachment D1(c), that are no longer included in the 2023 scope of work as noted below:

- Roseville Larpenteur Ave W: Postponed by the city until 2024.
 - Mounds View County Rd I and County Rd H: Road work in this area has been postponed by the county. No date has been provided at this time as to when road work will start.
 - New Brighton Forest Dale Rd: Postponed by the city until 2026.
-

Preparer: Daniel J. Connoy
Title: Manager
Department: Gas Engineering
Telephone: (651) 229-2211
Date: January 9, 2023

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Xcel Energy Information Request No. 9
Docket No.: G002/M-22-578
Response To: Minnesota Department of Commerce
Requestor: Felicia Cullen, Holly Soderbeck
Date Received: December 29, 2022

Question:

Topic: Mandated Relocation Projects
Reference(s): Petition, p. 21

The Petition states, “We estimate the total capital expenditures we are asking to recover in the GUIC Rider will be approximately \$8.2 million in 2023. Table 6 below shows the estimated mandated relocation project costs.

Table 6
2023 Estimated Mandated Relocation Project Costs (\$ Millions)

Mandated Relocation Program	2023 Capital	2023 O&M
Total 2023 Capital Expenditures and O&M	\$14.9	\$0.0
Total 2023 Minnesota Revenue Requirement	\$4.9	\$0.0

” (p. 21).

- A. Please provide a breakdown of the total 2023 capital expenditures and O&M by relocation project (Inver Grove Heights, Maplewood, May Township, St. Paul, Stillwater, Washington County Road 5, Metro Transit Gold Line, etc.) Please include, for each project, the expected project completion date, estimated total cost, and estimated spend thus far.
- B. Please provide the total 2023 Minnesota Revenue Requirement calculation for mandated relocations and DIMP separately, in the same format as Att H – DIMP RR (in spreadsheet format, including formulas).

Response:

To clarify and provide context to the sentence quoted by the Department in the initial portion of their question above, the \$14.9 million in Table 6 represents the total estimated costs that the Company will incur for mandated relocations in 2023 and represents the amount included

in our revenue requirement request. The \$8.2 million mentioned in the quoted sentence was an incorrect amount that assumed an adjustment for mandated relocation recovery in base rates. This adjustment was required prior to 2023, as the base rates approved in a previous rate case included \$6.7 million in mandated relocation costs. However, the interim rates currently in effect, as well as the final base rates included in the settlement agreement in our pending rate case, no longer include any recovery for mandated relocations, and we have proposed recovering all mandated relocation costs through the GUIC Rider going forward. We discuss the lack of adjustments for items in base rate in greater detail on Page 31 of our Petition.

- A. In addition to the information provided on page 3 of Petition Attachment E, the Company offers the additional requested information below for the 2023 relocation projects. These projects have not incurred capital expenditures to date as they will begin in 2023. Please note there are no O&M costs associated with these mandated relocation projects.

As noted on page 27 of Petition Attachment D, the Dawn Ave Relocation project is a multi-year project starting in 2023 and concluding in 2024. The White Bear Lake/Stillwater/County Road 5 relocation project noted below also is anticipated to be completed in 2024. We discuss the progress of that project in greater detail in Part C of our response to DOC Information Request No. 10.

Project Name (WBS L2 Description)	Estimated In Service Date
MN/NPT/IGH/Dawn Ave Recon	12/31/2024
MN/STP/Summit Ave Recon	7/31/2023
MN/NSPM/Metro/Gold Line Relocation	6/30/2023
MN/WBL/Stillwater/Cty Rd 5 relocate	8/31/2024
MN/WYO/May Twnshp/Washington County	5/31/2023

- B. Please see Attachment A to this response, provided in live Excel spreadsheet format, for the 2023 revenue requirement for mandated relocations and DIMP separately, in the same format as Attachment H with the instant petition.

Preparer:	Daniel J. Connoy	Mary Pope
Title:	Manager	Senior Rate Analyst
Department:	Gas Engineering	Revenue Requirements – North
Telephone:	(651) 229-2211	(612) 330-6574
Date:	January 9, 2023	

Northern States Power Company

Docket No. G002/M-22-578
 Gas Utility Infrastructure Cost Rider - 2023 Factors
 DOC Information Request No. 9
 Attachment A - Page 1 of 2

2023 Minnesota Gas GUIC Rate Rider
DIMP Revenue Requirements (excluding Mandated Relocates)

	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Annual 2023
Rate Base													
CWIP	-	-	-	-	-	-	-	-	-	-	-	-	-
Plant In-Service	197,652,104	198,966,865	200,306,499	201,975,210	204,193,041	235,495,510	238,135,724	240,848,843	243,361,696	245,769,559	248,116,662	249,886,960	249,886,960
Less Accumulated Book Depreciation Reserve	10,870,878	11,195,658	11,511,053	11,831,099	12,120,720	12,425,529	12,769,396	13,118,392	12,202,218	12,574,773	12,953,373	13,384,496	13,384,496
Less Accumulated Deferred Taxes	14,370,798	14,466,923	14,563,049	14,659,175	14,755,301	14,851,426	14,947,552	15,043,678	15,139,804	15,235,929	15,332,055	15,428,181	15,428,181
End Of Month Rate Base	172,410,428	173,304,284	174,232,397	175,484,937	177,317,021	208,218,555	210,418,776	212,686,773	216,019,674	217,958,857	219,831,233	221,074,283	221,074,283
Average Rate Base (Prior Mo + Cur Month/2)	172,004,240	172,857,356	173,768,341	174,858,667	176,400,979	192,767,788	209,318,665	211,552,774	214,353,223	216,989,266	218,895,045	220,452,758	
Return on Rate Base													
Debt Return (Avg RB * Wtd Cost of Debt)	279,507	280,893	282,374	284,145	286,652	313,248	340,143	343,773	348,324	352,608	355,704	358,236	3,825,606
Equity Return (Avg RB * Wtd Cost of Equity)	719,551	723,120	726,931	731,492	737,944	806,412	875,650	884,996	896,711	907,738	915,711	922,227	9,848,483
Total Return on Rate Base	999,058	1,004,013	1,009,304	1,015,637	1,024,596	1,119,660	1,215,793	1,228,769	1,245,035	1,260,346	1,271,415	1,280,463	13,674,089
Income Statement Items													
AFUDC Pre-Eligible	-	-	-	-	-	-	-	-	-	-	-	-	-
Operating Expenses	20,833	20,833	20,833	20,833	20,833	20,833	20,833	20,833	20,833	20,833	20,833	20,833	250,000
Property Taxes	248,529	248,529	248,529	248,529	248,529	248,529	248,529	248,529	248,529	248,529	248,529	248,529	2,982,348
Book Depreciation	382,547	385,027	387,610	390,537	394,318	426,932	459,957	465,165	470,250	475,037	479,664	483,670	5,200,713
Deferred Taxes	96,126	96,126	96,126	96,126	96,126	96,126	96,126	96,126	96,126	96,126	96,126	96,126	1,153,509
Gross Up for Income Tax (see below)	166,987	163,777	166,238	161,435	182,056	232,121	295,014	315,915	337,889	325,266	300,322	315,996	2,963,016
Total Income Statement Expense	915,022	914,293	919,336	917,459	941,862	1,024,541	1,120,459	1,146,568	1,173,627	1,165,791	1,145,474	1,165,154	12,549,586
Total Revenue Requirement	1,914,080	1,918,306	1,928,640	1,933,097	1,966,458	2,144,201	2,336,251	2,375,337	2,418,662	2,426,137	2,416,889	2,445,617	26,223,675
Capital Structure													
Weighted Cost of Debt	1.94%												
Weighted Cost of Equity	5.02%												
Required Rate of Return	6.96%												
Current Income Tax Calculation													
Equity Return	719,551	723,120	726,931	731,492	737,944	806,412	875,650	884,996	896,711	907,738	915,711	922,227	9,848,483
Book Depreciation	382,547	385,027	387,610	390,537	394,318	426,932	459,957	465,165	470,250	475,037	479,664	483,670	5,200,713
Deferred Taxes	96,126	96,126	96,126	96,126	96,126	96,126	96,126	96,126	96,126	96,126	96,126	96,126	1,153,509
Less Tax Depreciation	1,139,225	1,151,108	1,151,483	1,171,790	1,217,499	1,238,855	1,230,967	1,231,939	1,209,767	1,206,527	1,204,259	1,144,745	14,298,165
Plus CPI-Tax Interest (If Applicable)	355,001	352,877	352,959	353,869	440,469	484,867	530,642	568,878	584,385	534,033	457,326	426,149	5,441,454
Total	414,000	406,042	412,142	400,233	451,358	575,482	731,407	783,226	837,704	806,408	744,567	783,427	7,345,995
Tax Rate (T/(1-T))	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351
Gross Up for Income Tax	166,987	163,777	166,238	161,435	182,056	232,121	295,014	315,915	337,889	325,266	300,322	315,996	2,963,016

Northern States Power Company

Docket No. G002/M-22-578
 Gas Utility Infrastructure Cost Rider - 2023 Factors
 DOC Information Request No. 9
 Attachment A - Page 2 of 2

**2023 Minnesota Gas GUIC Rate Rider
 Mandated Relocates Revenue Requirements**

	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Annual 2023
Rate Base													
CWIP	-	-	-	-	-	-	-	-	-	-	-	-	-
Plant In-Service	34,565,417	35,410,385	36,224,528	37,150,382	38,499,515	40,406,059	41,998,603	43,165,399	44,211,419	45,111,279	45,981,907	46,627,496	46,627,496
Less Accumulated Book Depreciation Reserve	451,234	469,813	474,601	504,237	524,328	536,203	549,205	537,126	540,629	548,128	591,055	649,438	649,438
Less Accumulated Deferred Taxes	883,713	945,704	1,007,696	1,069,687	1,131,678	1,193,670	1,255,661	1,317,653	1,379,644	1,441,635	1,503,627	1,565,618	1,565,618
End Of Month Rate Base	33,230,470	33,994,867	34,742,231	35,576,458	36,843,509	38,676,187	40,193,737	41,310,620	42,291,147	43,121,515	43,887,225	44,412,439	44,412,439
Average Rate Base (Prior Mo + Cur Month/2)	32,914,472	33,612,668	34,368,549	35,159,344	36,209,983	37,759,848	39,434,962	40,752,178	41,800,883	42,706,331	43,504,370	44,149,832	
Return on Rate Base													
Debt Return (Avg RB * Wtd Cost of Debt)	53,486	54,621	55,849	57,134	58,841	61,360	64,082	66,222	67,926	69,398	70,695	71,743	751,357
Equity Return (Avg RB * Wtd Cost of Equity)	137,692	140,613	143,775	147,083	151,478	157,962	164,970	170,480	174,867	178,655	181,993	184,693	1,934,262
Total Return on Rate Base	191,178	195,234	199,624	204,217	210,320	219,322	229,051	236,702	242,793	248,053	252,688	256,437	2,685,619
Income Statement Items													
AFUDC Pre-Eligible	-	-	-	-	-	-	-	-	-	-	-	-	-
Operating Expenses	-	-	-	-	-	-	-	-	-	-	-	-	-
Property Taxes	42,838	42,838	42,838	42,838	42,838	42,838	42,838	42,838	42,838	42,838	42,838	42,838	514,057
Book Depreciation	66,571	68,083	69,698	71,390	73,604	76,772	80,176	82,861	85,014	86,907	88,630	90,105	939,809
Deferred Taxes	61,991	61,991	61,991	61,991	61,991	61,991	61,991	61,991	61,991	61,991	61,991	61,991	743,897
Gross Up for Income Tax (see below)	(5,080)	(3,693)	(1,907)	(7,435)	(10,367)	(9,129)	(4,527)	2,091	9,790	17,125	19,280	29,300	35,446
Total Income Statement Expense	166,320	169,219	172,620	168,785	168,066	172,472	180,478	189,781	199,633	208,861	212,739	224,234	2,233,209
Total Revenue Requirement	357,499	364,453	372,244	373,002	378,386	391,793	409,530	426,483	442,426	456,914	465,427	480,671	4,918,828
Capital Structure													
Weighted Cost of Debt	1.94%												
Weighted Cost of Equity	5.02%												
Required Rate of Return	6.96%												
Current Income Tax Calculation													
Equity Return	137,692	140,613	143,775	147,083	151,478	157,962	164,970	170,480	174,867	178,655	181,993	184,693	1,934,262
Book Depreciation	66,571	68,083	69,698	71,390	73,604	76,772	80,176	82,861	85,014	86,907	88,630	90,105	939,809
Deferred Taxes	61,991	61,991	61,991	61,991	61,991	61,991	61,991	61,991	61,991	61,991	61,991	61,991	743,897
Less Tax Depreciation	279,212	281,038	282,407	302,286	316,998	323,032	320,857	312,387	300,186	287,985	287,985	267,521	3,561,897
Plus CPI-Tax Interest (If Applicable)	364	1,194	2,214	3,388	4,221	3,673	2,497	2,239	2,585	2,888	3,172	3,373	31,808
Total	(12,594)	(9,157)	(4,729)	(18,433)	(25,703)	(22,634)	(11,224)	5,184	24,271	42,456	47,801	72,641	87,879
Tax Rate (T/(1-T))	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351	0.403351
Gross Up for Income Tax	(5,080)	(3,693)	(1,907)	(7,435)	(10,367)	(9,129)	(4,527)	2,091	9,790	17,125	19,280	29,300	35,446

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Xcel Energy Information Request No. 10
 Docket No.: G002/M-22-578
 Response To: Minnesota Department of Commerce
 Requestor: Felicia Cullen, Holly Soderbeck
 Date Received: December 29, 2022

Question:

Topic: Mandated Relocations
 Reference(s): Petition, pp. 20-21

- A. Please provide the current number, budget, and other details of mandated relocations occurring in 2023, in addition to the discrete projects already identified within the Petition.
- B. Please explain when capital expenditures related to mandated relocations as a result of the Metro Transit Gold Line are expected to be reimbursed. Please provide the amount spent to date on the project, the total amount projected for the project, and the total amount the Company expects to be reimbursed.
- C. Please provide the project start date, projected total cost, anticipated project end date, amount spent to date, and any other details related to the Washington County Road 5 reconstruction project.

Response:

- A. Please refer to pages 27-28 of Attachment D and page 3 of Attachment E for the mandated relocations occurring in 2023. Since the Petition was filed on November 1, 2022, the following additional discrete mandated relocation projects have been identified:

Area	WBS L2	WBS L2 Description	Party Requesting Relocation	Size / Material	Estimated Footage (feet)	Estimated Cost (\$ millions)
Northwest	E.0010038.062	MN/NW/STC/REL/Clear Lake Line-A	MN Dept. of Transportation	6" Steel	4,600	\$2.80M
White Bear Lake	E.0010038.071	MN\FRL\Everton Ave N\2700ft 6in 4in	Washington County	2" PE	300	\$0.27M
				4" PE	1,200	
				6" PE	1,200	
	E.0010038.074	MN\BAT\Co Rd 65\18400ft 4in relocate	Washington County	4" PE	18,400	\$1.30M
Wyoming	E.0010038.073	MN/NBR/Co Rd 70 4in Relocation	Chisago County	4" PE	7,500	\$0.56M

To account for discrete projects that emerge outside of the normal budget process, the Company reviews historical spend and will place funding in a routine working capital fund (WCF). The emerging projects noted above were allocated funding from E.0010006.002 MN – Gas Mandates WCF (page 3 of Petition Attachment E) and represent a portion of the emerging projects that may be allocated funding from the WCF. We anticipate additional projects emerging during 2023.

Please note the MN/NW/STC/REL/Clear Lake Line-A project was originally forecasted to be completed in 2022 (refer to page 2 of Attachment E); however, after discussions with the Minnesota Department of Transportation (MNDOT), the project was shifted to 2023 for completion.

- B. The Company anticipates being reimbursed for costs incurred as a part of the Gold Line Project at project completion. To date the Company has incurred \$3.6 million in capital expenditures through November 30, 2022. The estimated remaining capital expenditures for this project are \$1.3 million, for a total of about \$4.9 million. The Company anticipates receiving reimbursement for most, if not all, of the costs.
- C. As noted on page 28 of Attachment D, the Washington County Rd 5 project in Stillwater, MN is a relocation of 2-inch and 4-inch main. The existing main conflicts with a Washington County reconstruction project for County Rd 5. This project was originally scheduled to begin in 2021; however, due to changes in Washington County's plans, this project has become a multiyear project planned for 2023 and 2024. This project will begin in 2023 pending any updates from Washington County. As such there are no capital expenditures to date. The anticipated project in service date is August 2024.

Preparer: Daniel J. Connoy
Title: Manager
Department: Gas Engineering
Telephone: (651) 229-2211
Date: January 9, 2023

- Not Public Document – Not For Public Disclosure
 Public Document – Not Public Data Has Been Excised
 Public Document

Xcel Energy Information Request No. 3
Docket No.: G002/M-22-578
Response To: Minnesota Department of Commerce
Requestor: Felicia Cullen, Holly Soderbeck
Date Received: November 14, 2022

Question:

Topic: Annual revenue Collections by Recovery Mechanism
Reference(s): Petition, Figure 1 on p. 9

A. Please provide the underlying data for Petition, Figure 1, on p. 9.

Response:

The following table provides the underlying data (\$ millions) for Petition, Figure 1, page 9:

	2018	2019	2020	2021	2022	2023
Base Revenue	\$170.6	\$174.3	\$175.4	\$163.9	\$128.9	\$122.6
PGA Revenue	\$300.9	\$287.3	\$231.8	\$335.3	\$609.9	\$539.1
Feb 2021 Event				\$14.4	\$44.6	\$54.0
Other Riders	\$19.3	\$15.7	\$18.8	\$14.0	\$25.8	\$21.8
GUIC Rider	<u>\$21.2</u>	<u>\$21.2</u>	<u>\$19.1</u>	<u>\$25.6</u>	<u>\$32.6</u>	<u>\$37.5</u>
Total Operating Revenue	\$512.0	\$498.6	\$445.1	\$553.2	\$841.8	\$775.0

Preparer: Mary Pope
Title: Senior Rate Analyst
Department: Revenue Requirements North
Telephone: (612) 330-6574
Date: November 23, 2022

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, 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
Public Comments**

Docket No. G002/M-22-578

Dated this **26th** day of **January 2023**

/s/Sharon Ferguson

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