

May 29, 2026

***Via e-Filing***

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

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

Dear Ms. Bergman:

CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas (CenterPoint Energy), Minnesota Energy Resources Corporation, Greater Minnesota Gas, Great Plains Natural Gas, Minnesota Pipe Trades Association, International Union of Operating Engineers Local 49, International Brotherhood of Electrical Workers State Council, Housing First, Minnesota Farm Bureau Federation, Minnesota Multi Housing Association, the Coalition of Greater Minnesota Cities, Minnesota Corn Growers Association, and Minnesota Biofuels Association, collectively the Joint Commenters, respectfully submit this joint letter.

The Joint Commenters thank Commission Staff for the detailed and thorough briefing papers. The purpose of this letter is to clarify the recommendations of the Joint Commenters and to respond to the new decision options proposed on May 22, 2026 by Center for Energy and Environment (CEE), Xcel Energy, LIUNA Minnesota and North Dakota (LIUNA), and Energy CENTS Coalition (ECC). The Joint Commenters' goal in this letter is to simplify and focus the decision options in this complex docket. We look forward to answering any questions that Commissioners have during the June 4, 2026 agenda meeting.

**CEE/Xcel/LIUNA/ECC Proposal**

The Joint Commenters appreciate the efforts of CEE, Xcel Energy, LIUNA, and ECC to narrow the issues in this proceeding. The Joint Commenters continue to believe that not all utilities are the same; noting recommendations that work well for Xcel Energy may be different than what works for other utilities and their customers. Xcel Energy is the only dual-fuel utility in Minnesota, with both electric and natural gas operations, which informs its approach to energy programs and customer offerings. Joint Commenters request the Commission consider the unique characteristics of each utility in its review of the record, specifically the footage allowance for each utility.

**Line Extension Allowances**

Reducing extension allowances will negatively impact customers who are seeking access to the lowest cost source for heating their homes through the Minnesota winter. Over the last forty years, line extensions have and continue to be an important and historically consistent tool for Minnesotans to access affordable and reliable energy, as well as to enable customer

decarbonization pathways through access to utility energy efficiency and innovation programs. Existing line extension policies have aided the energy infrastructure build out for the metropolitan and suburban areas of Hennepin County and should continue to aid the growing Minnesotan counties outside of the metropolitan area. Reducing or eliminating line extension allowances would make it more difficult and costly to build and operate affordable housing at a time when such housing is urgently needed. At the same time, making natural gas extensions more expensive for customers risks leaving some Minnesotans reliant on delivered fuels or wood, increasing energy insecurity, reducing access to energy efficiency programs and consumer protections, and undermining state climate goals by driving higher greenhouse gas emissions and other pollutants.

Gas utilities have already made significant changes in line extension policy in recent years. For example, until 2023, CenterPoint Energy's approved tariff provided a main extension allowance of 150 feet. In 2023, CenterPoint Energy agreed to reduce its main extension allowance by one-third, from 150 feet to 100 feet, as part of a comprehensive settlement of all issues in its 2021 rate case.<sup>1</sup> Requiring CenterPoint Energy to further reduce its main extension allowances is not reasonable considering CenterPoint Energy's main extension allowance was reduced by one-third only a few years ago. Additionally, there has not been time to evaluate the impact of this significant change.

Finally, it is not reasonable to apply the same one-size-fits-all line extension allowance rule to every natural gas utility. Each utility operates in different areas of the state, serving different types of communities and therefore has different circumstances. Line extension policies should be tailored carefully for each. The investor-owned electric utilities each have a very different tariff including extension allowances for electric line extensions,<sup>2</sup> and the Commission should permit natural gas utilities the same opportunity to design tariffs that fit their customers and situations.

Joint Commenters recommend Decision Option 3. In addition, Joint Commenters recommend additional language to clarify that other utilities are not required to modify existing tariffs, as follows:

Joint Commenters' Modified Decision Option 3: Continue to allow utilities to offer residential line and main extension allowances. No tariff updates are required unless otherwise ordered.

### **Line Extension Calculations**

Joint Commenters oppose Decision Options 6 and CEE/Xcel/LIUNA/ECC New Decision Option 24, for several reasons.

First, line extension tariffs are primarily a question of policy. As demonstrated by this record, the issue involves several competing policy goals including supporting access to low-cost heat,

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<sup>1</sup> Settlement, Docket 21-435, Page 18 (Mar. 14, 2022).

<sup>2</sup> Xcel Energy permits 100 free feet of single-phase line extension. Xcel Energy Minnesota Electric Rate Book, Section 5.1, Standard Installation Rules. Minnesota Power permits free line extension as long as the cost is below a threshold of \$751. Minnesota Power Electric Rate Book Volume I, Section VI, Extension Rules. Otter Tail Power has a more complex system that involves estimation of three-year revenues and, in some situations, electric service agreements to recover the costs of extension. Otter tail Power, Electric Rate Schedule, General Rules and Regulations Section 5.01.

fairness between existing and future customers, and the state's goals to reduce emissions and spur innovation by natural gas utilities. These policy considerations do not lend themselves to a one-size-fits-all formula for line extension policies across diverse utilities. Attempting to reduce this policy evaluation to a calculation assumes a level of precision that does not exist. As Staff noted in the briefing papers, "Staff is concerned that there is a risk of introducing an over-complicated model into line extension policy, one over which groups may continuously argue who 'got it right' or not."<sup>3</sup> Formalizing that type of calculation could invite endless litigation over the inputs and assumptions and distract from the more important policy conversation.

Second, the changes and factors suggested in these Decision Options are highly fact specific. To the extent calculations are used to assess the reasonableness of line extension allowances, the results will likely be susceptible to the assumptions and inputs selected by analysts. Those issues should be evaluated in rate case proceedings where experts can review and verify the facts on a utility-specific basis.

Third, it is not clear that the same calculation or guidelines should be established for each natural gas utility. There may be factual differences between utilities that justify a different result, rather than applying the same set of rules for each.

Instead, the Joint Commenters recommend allowing stakeholders to apply the lessons learned in this proceeding to evaluate line extension tariffs in rate case proceedings. Stakeholders will be able to advocate for a variety of calculation methods, without prescribing methodologies for all utilities.

### **Energy Conservation and Optimization ("ECO") program**

Minnesota natural gas utilities play a vital role in promoting energy efficiency through ECO programs for the state's natural gas customers. Joint Commenters continue to believe that the triennial ECO filings are a better venue to consider the specifics of program design, and therefore do not support the inclusion of Decision Option 15.

### **Future Rate Cases**

Joint Commenters support the concept of continuing to discuss line extension policies in rate cases, but recommend that Decision Options 11, 12, CEE/Xcel/LIUNA/ECC New 25, OAG/DOC Modified New 25, and OAG/DOC New 26 are more complex and prescriptive than is necessary. Instead, Joint Commenters recommend a simplified list of rate case requirements that focuses on the major issues while allowing stakeholders to develop more detailed information in the relevant dockets.

For these reasons, Joint Commenters recommend a modified version of Decision Option 25:

Joint Commenters' Alternative Decision Option 25:

In future rate case proceedings, natural gas utilities shall address the following topics related to line extension and allowance policies:

- a. Explain the policy and/or economic basis for the line extension and allowance policy.

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<sup>3</sup> Briefing Papers at 34.

- b. Provide information about line extensions and allowances completed in the last year for which complete financial data is available, including:
- i. The average amount of footage required to connect to the company's existing infrastructure;
  - ii. Average total expense incurred by the company to connect to the company's existing infrastructure; and,
  - iii. Average required Contribution in Aid of Construction (CIAC) payment, if any, that the company required to the company's existing infrastructure.
- c. Identify changes in technology, state and federal policy, or Commission actions that have an impact on the line extension and allowance policy, and whether they justify a change in the line extension and allowance policy.
- d. Discuss the impact of line extension and allowances policies on customer groups, including low-income customers, the balance between existing and new customers, and the impacts on economic development and local jobs.

### **Low-Income Protections**

Joint Commenters support the efforts of the OAG to address low-income protections in this proceeding. In particular, Joint Commenters are supportive of the concepts addressed by Decision Option 10, but have identified some challenges in implementation.

First, utilities often do not have information about the income-eligibility of customers, and the OAG has not explained what income eligibility thresholds should be applied.

Second, because line extensions are often being completed by developers for future purchasers, it is not clear that the utility will always be able to determine whether a customer is income-eligible at the time construction begins. It is also not clear how to handle line extensions for multi-unit dwellings, particularly those that might involve some units that are low-income and some that are not.

For these reasons, rather than selecting Decision Option 9 or 10, Joint Commenters recommend that if the Commission considers a need for this coordination, an alternative approach would be to direct a compliance filing with the following language:

Joint Commenters' Alternative Decision Option 10

Within 90 days after the Order in this proceeding, the gas utilities shall consult with Office of the Attorney General and make a compliance filing about the possibility of waiving CIAC for customers who lack the ability to pay.

## Other Decision Options

Joint Commenters support Decision Options 14 and CEE/Xcel/LIUNA/ECC modified 17 from May 22, 2026 letter noted previously.

## Conclusion

Joint Commenters appreciate the attention of stakeholders, Commission staff, and Commissioners to this important issue, and recommend adoption of the following Decision Options: Joint Commenters' Modified 3, Joint Commenters' Alternative Decision Option 10, Decision Option 14 (from Staff Briefing Papers), CEE/Xcel/LIUNA/ECC Modified Decision Option 17, and Joint Commenters' Alternative Decision Option 25, as described in this letter.

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## CERTIFICATE OF SERVICE

I, Christina Benning, certify that on Friday, May 29, 2026, I served the attached Letter Filing of the Joint Commenters in Docket No. G999/CI-21-565 to all persons at the addresses indicated on the attached service list by having the document delivered via electronic filing.

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90	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	21-565Official Service List
91	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	21-565Official Service List
92	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	21-565Official Service List
93	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-565Official Service List
94	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	21-565Official Service List
95	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
96	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	21-565Official Service List
97	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
98	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55407 United States				Service List
99	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
100	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
101	Will	Nissen	wnissen@mncee.org	Center for Energy and Environment			Electronic Service		No	21-565Official Service List
102	Curtis	Nordgaard	nordgaard@fresh-energy.org	Fresh Energy		408 Saint Peter Street Suite 350 St Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
103	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-565Official Service List
104	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
105	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	21-565Official Service List
106	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-565Official Service List
107	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-565Official Service List
108	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	21-565Official Service List
109	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	21-565Official Service List
110	Bret	Pence	bretpence@mnipl.org	Minnesota Interfaith Power and Light		106 Waverly Place Duluth MN, 55803 United States	Electronic Service		No	21-565Official Service List
111	Lisa	Peterson	lisa.r.peterson@xcelenergy.com			414 Nicollet Mall FL 7 Minneapolis MN, 55401 United States	Electronic Service		No	21-565Official Service List
112	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee	Electronic Service		No	21-565Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						WI, 53203 United States				Service List
113	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	21-565Official Service List
114	Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	21-565Official Service List
115	Lauren	Reeg	lreeg@rmi.org	RMI		806 N Pinyon Ct. Hartland WI, 53029 United States	Electronic Service		No	21-565Official Service List
116	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	21-565Official Service List
117	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	21-565Official Service List
118	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	21-565Official Service List
119	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	21-565Official Service List
120	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	21-565Official Service List
121	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
122	Kathleen	Schuler	kathleen@hpforhc.org	Health Professionals for a Healthy Climate		Health Professionals for a Healthy Climate PO Box 583013 Minneapolis MN, 55458-3013 United States	Electronic Service		No	21-565Official Service List
123	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	21-565Official Service List
124	Patrick	Serfass	policy@americanbiogascouncil.org	American Biogas Council		1126 I Street SE Washington DC, 20003 United States	Electronic Service		No	21-565Official Service List
125	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						DC, 20036 United States				
126	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	21-565Official Service List
127	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	21-565Official Service List
128	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	21-565Official Service List
129	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	21-565Official Service List
130	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	21-565Official Service List
131	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
132	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	21-565Official Service List
133	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	21-565Official Service List
134	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
135	Mark	Spurr	msspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
136	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	21-565Official Service List
137	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
138	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-565Official Service List
139	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
140	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-565Official Service List
141	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	21-565Official Service List
142	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	21-565Official Service List
143	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	21-565Official Service List
144	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L Street #513 Sacramento CA, 95814 United States	Electronic Service		No	21-565Official Service List
145	Nicole	Westling	nicole.westling@state.mn.us		Department of Commerce	85 7th Place E Suite 280 St Paul MN, 55001 United States	Electronic Service		No	21-565Official Service List
146	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	21-565Official Service List
147	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	21-565Official Service List
148	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List
149	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	21-565Official Service List
150	Mariko	Yatsunami	myatsunami@mncee.org	Center for Energy and Environment		212 N 3rd Ave Suite 560 Minneapolis MN, 55404 United States	Electronic Service		No	21-565Official Service List
151	Grant	Zimmerman	gzimmerman@ampamericas.com	Amp Americas		811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States	Electronic Service		No	21-565Official Service List
152	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	21-565Official Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
153	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	21-565Official Service List
154	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-565Official Service List