BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers	ISSUE DATE: February 17, 2023 DOCKET NO. G-999/CI-21-135
In the Matter of the Petition of CenterPoint Energy for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions	DOCKET NO. G-008/M-21-138
In the Matter of the Petition by Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities Co., for Approval of Rule Variances to Recover High Natural Gas Costs from February 2021	DOCKET NO. G-004/M-21-235
In the Matter of Petition of Northern States Power Company d/b/a Xcel Energy to Recover February 2021 Natural Gas Costs	DOCKET NO. G-002/CI-21-610
In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Recovery Process for Cost Impacts Due to February Extreme Gas Market Conditions	DOCKET NO. G-011/CI-21-611 ORDER REQUIRING ACTIONS TO MITIGATE IMPACTS FROM FUTURE NATURAL GAS PRICE SPIKES, SETTING FILING REQUIREMENTS, AND INITIATING A PROCEEDING TO ESTABLISH GAS RESOURCE PLANNING REQUIREMENTS

PROCEDURAL HISTORY

In February 2021, cold weather across much of the United States led to increased demand for natural gas and, in some areas, supply disruptions. An extreme rise in natural gas prices ensued. Minnesota's rate-regulated gas utilities maintained continuous service to customers throughout this period, but some incurred unprecedented costs purchasing gas on the spot market. Under Commission rules, such costs ordinarily are billed to ratepayers through an automatic purchased-gas adjustment to customer rates over the next 12-month period beginning on September 1 each year. However, the extreme circumstances prompted the Commission to investigate whether all the gas costs utilities incurred during the price spike event were prudently incurred and to take actions to reduce the impacts of the prudently incurred extraordinary costs on ratepayers.

On October 19, 2022, the Commission issued orders in these dockets finding that some of the extraordinary gas costs incurred by CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas (CenterPoint); Northern States Power Company d/b/a Xcel Energy (Xcel); and Great Plains Natural Gas Co. (Great Plains) resulted from imprudent actions by the utilities and could not be recovered from ratepayers, and approving a settlement in which Minnesota Energy Resources Corporation (MERC) agreed with consumer advocates that the utility would not recover a portion of its extraordinary gas costs from ratepayers.

Additionally, the October 19 orders required CenterPoint, Xcel, MERC, and Great Plains (the affected utilities) to file plans to improve their practices to better protect ratepayers from future price spikes in the natural gas spot market. The affected utilities were also required to discuss other topics in their filings, including the possibility of incorporating long-term resource planning into gas-utility regulation.

On September 15, 2022, each affected utility made an individual filing pursuant to the October 19 orders. The affected utilities also filed joint comments proposing a price-based test that could be used to prompt certain potentially cost-saving actions when spot-market prices reach a threshold level in the future.

On October 14, 2022, the following parties and participants filed comments responding to the utilities' September 15 filings:

- Department of Commerce, Division of Energy Resources (the Department);
- Office of the Attorney General—Residential Utilities Division (the OAG);
- Citizens Utility Board of Minnesota (CUB); and
- Center for Energy and Environment.

On December 8, 2022, the matter came before the Commission.

FINDINGS AND CONCLUSIONS

I. Background on Gas Purchasing

Minnesota gas utilities purchase natural gas from various gas-producing regions and transport it via pipeline to serve customers in Minnesota. Gas purchases can be made for baseload (on a monthly or seasonal basis) or on the daily spot market.

The daily spot market typically operates in a day-ahead fashion, meaning trades occur on the business day before delivery. The market does not formally operate on weekends or holidays, so trades preceding weekends or holidays cover the period through the next business day. Gas may be purchased on the daily spot market at a "firm" price agreed upon between a buyer and a seller, or at the "index" price, which is an average based on the firm transactions for that trading day at each hub and is not published until the end of the day, after trading closes. Prices are set competitively and fluctuate based on market supply and demand. Accordingly, events such as extremely cold weather or storm-related supply disruptions can lead to abrupt price spikes.

In addition to baseload supply and daily spot-market purchases, gas utilities have various tools they can use to provide price stability and ensure reliability. These tools include interruptible service agreements, gas storage, peak-shaving facilities, and financial hedging.

Interruptible service agreements allow a utility to call on customers to temporarily curtail their gas usage. Customers may choose to accept such terms in exchange for lower rates.

Storage entails maintaining a reserve of gas purchased outside the heating season to be drawn on during the heating season when commodity prices are generally higher.

Peak-shaving facilities, also known as peaking plants, help a utility to maintain reliable service on relatively rare occasions—for example, when capacity needs exceed contracted pipeline capacity or when fluctuations in load or supply require additional gas—by supplementing the utility's supply with propane or liquid natural gas.

Financial hedging is an action taken to reduce the risk of financial loss, often by using a financial derivative such as an option or futures contract to offset the risk of price movement in a related physical transaction.

In this proceeding, CenterPoint, Xcel, MERC, and Great Plains were required to file plans to improve their practices with respect to the above resources in ways that could help reduce exposure to the risk of high prices in the spot market for natural gas.

II. Two-Part Economic Trigger

A. The Utilities' Proposal

The affected utilities jointly proposed a two-part test that would set an objective "trigger" level above which gas index prices would be deemed high enough to prompt special cost-mitigative actions. Each utility proposed to take certain actions (e.g., curtailing interruptible customers, dispatching peaking plants, or increasing storage withdrawal volumes) to reduce the amount of daily spot gas it would need to purchase when the following criteria are met:

> The prior gas day (or multiple days in the case of weekends and holidays) settled Gas Daily daily index price at any of the identified pricing hubs where the utility would purchase daily supplies:
>
> 1. is greater than or equal to $50.00 per dekatherm (Dth), and
> 2. is greater than or equal to five times the weighted average cost of gas forecast for the month at issue in the utility's filed purchased-gas adjustment for that month.

The utilities contended that setting an objective price threshold to prompt extraordinary cost-saving actions would add a level of certainty, predictability, and consistency in utility planning, which could be particularly helpful in guiding utility decisions that must be made under time pressure in sometimes extreme and fluctuating conditions. They argued that the price threshold they proposed provides a reasonable balance between ensuring reliability and mitigating the costs passed on to customers resulting from extraordinary pricing events.

The utilities stated that the structure of index-priced spot-market trading limits their ability to reliably achieve cost savings by changing their behavior in response to high prices. Spot-market gas is typically purchased at an unknown index price before 9 a.m. the day before it will be delivered to customers, and the index price for a given transaction is not known until after trading has closed for that day. Accordingly, by the time a utility learns that a hub's index price exceeded a particular threshold, gas has already been purchased at that price and it is too late to alter those transactions based on the high price.

Considering these limitations of the market structure, the utilities proposed to alter their purchasing decisions on the next trading day after a price meeting the threshold has occurred, for purchases whose prices again will not be known until after they are made. The utilities asserted that this practice could help reduce costs if prices remain high for at least one trading day after the threshold price first occurs; however, if the index settles at a lower price on the day of the cost-saving measures, then this approach may not result in significant avoided costs.

Each utility proposed amended interruptible tariff language incorporating the above two-part price threshold and providing that interruptible customers would be called to curtail based on the price of gas the next day after a price meeting the threshold occurs. The proposed interruptible tariffs are discussed in further detail below in part II.

Xcel and CenterPoint also proposed to dispatch their peaking plants to reduce the volume of spot gas they need to purchase the day after an index price meeting the threshold occurs. Further, CenterPoint proposed to increase planned withdrawal volumes from its Waterville storage facility and reduce spot-gas purchases accordingly the day after a threshold price occurs. Unlike the other utilities, CenterPoint stated that it would not implement these changes without specific Commission approval; its requests for approval are discussed below in part III.

B. Comments

1. CUB

CUB opposed the utilities' proposal to set a bright-line price threshold dictating when certain actions could be taken to reduce spot-gas purchases based solely on the previous trading day's index prices. CUB argued that this narrow, restrictive approach would impede the utilities' flexibility and responsibility to apply their technical expertise and industry experience to evaluate changing market and weather conditions and to reasonably balance their obligations to provide safe, reliable service at just and reasonable rates. CUB expressed concerns that the utilities may seek to shield themselves from prudence review by adhering to this prescriptive rule rather than conducting thorough, case-by-case analyses of all relevant facts.

CUB argued that it is impossible to set objective metrics to predetermine what actions will be prudent under future extraordinary events. Each future weather or market event may look different than past events, and circumstances not limited to price may warrant different actions in any given case. CUB contended that it would not be reasonable to prejudge complex operational decisions solely based on whether prices have reached a particular level, effectively allowing the utility to ignore other circumstances and evade its responsibility to make prudent case-by-case determinations considering the totality of the circumstances.

Further, CUB contended that the reactive nature of the utilities' proposed approach severely limits its cost-saving potential. As proposed, even if forecasting and other observations showed a high likelihood of elevated prices, the utilities' proposal would support strict adherence to business-as-usual practices up until a specific index price has been confirmed after the close of trading for the day. By the time the test prompted action, it would be too late to affect that day's purchases at the threshold price, and the cost-saving measures may not have the intended cost-saving effect because the next day's prices may be lower. Meanwhile, the utility will have wasted valuable opportunities to reduce costs on the first day of expected high prices while it waited for index prices to confirm its expectations, after it is too late to act on those expectations effectively.

CUB stated that utilities might attempt to use this price-threshold test as a justification to ignore signs of likely high prices and forego prudent proactive measures that could mitigate impacts of foreseeable price spikes when the utility has the best chance of reducing costs.

In addition to opposing the structure of the economic-trigger proposal, CUB argued that the utilities failed to show, through quantitative analysis or even a detailed narrative explanation, that the proposed threshold price of $50.00/Dth is reasonable. CUB noted that the utilities' proposed threshold would have prompted action on only two occasions in the last decade.

2. The Department

Like CUB, the Department opposed the utilities' proposed two-part economic trigger because it could hinder the utilities' exercise of independent judgment to take prudent actions under the circumstances and because its strict reactive structure would limit its cost-saving potential.

The Department acknowledged that recent past index prices are a factor that should be considered when making gas-purchasing decisions, but it cautioned that past prices should not be relied on as the sole factor.

The Department asserted that the utilities are experienced, sophisticated actors in the gas market and are well suited to gauge market risk and volatility that would lead to a high likelihood of a price spike occurring. As a part of their ongoing obligations to act prudently at all times to ensure customers are charged only for reasonably incurred costs, gas utilities must use their knowledge of the market and other relevant factors to anticipate the risk of elevated prices and respond to reasonable expectations proactively. The Department contended that the approach proposed by the utilities would undercut that responsibility, to ratepayers' detriment.

3. The OAG

The OAG recommended that the Commission reject the proposed economic trigger. While acknowledging that it could be helpful for utilities to identify a price threshold as a general guideline that, in conjunction with other factors, would prompt consideration of special cost-saving measures, the OAG maintained that the utilities' proposal is too simplistic to be relied on as a strict rule.

The OAG argued that it would be unreasonable to rely on the mechanical application of a simplistic price threshold to predetermine operations in case of future price spikes because the details of any future pricing event are impossible to predict, and the number of factors that influence safety, reliability, and affordability are too numerous and complex to be reduced to an objective formula like the one proposed. Rather, the OAG contended, the utilities must be held responsible at all times for using their technical expertise and industry experience to respond to relevant information in a prudent manner as such information becomes reasonably available.

C. Commission Action

The Commission will not approve the two-part economic trigger as proposed by the utilities.

As CUB, the Department, and the OAG correctly identified, utilities have continuing obligations to act prudently to fulfill their coextensive obligations to provide safe and reliable service at just and reasonable rates. Utilities are expected to apply their technical and industry experience and expertise and to incorporate into their decision-making pertinent information about all relevant circumstances. The affected utilities have not persuasively demonstrated that their proposal would likely achieve these purposes.

Additionally, the utilities have not shown in the record that their proposal to wait until after a high daily index price has been published before taking any mitigating action would benefit their customers. Utilities must not only react prudently in response to observed conditions, but also make reasonable efforts to anticipate risks of high prices and market volatility and employ prudent proactive measures to avoid incurring unreasonable costs while maintaining safe and reliable service. The affected utilities have not substantiated how their proposal would fulfill these responsibilities.

III. Interruptible Tariffs

A. The Utilities' Proposals

Each affected utility proposed amended tariffs incorporating the two-part price threshold discussed above and specifying that interruptible customers would be called to curtail the next day after an occurrence of an index price meeting both criteria at any hub where the utility purchases gas.

While Xcel, MERC, and Great Plains proposed to curtail all of their interruptible customers for economic purposes, CenterPoint's proposal identified specific classes of interruptible customers to be subject to economic curtailment.

CenterPoint's proposed tariff also includes a provision limiting the number of times a customer can be curtailed for economic reasons to no more than five 24-hour gas days during each heating season (November 1 to March 1). The other utilities did not propose such limits.

CenterPoint stated that it would offer the proposed amended tariff only on an interim basis until it has had time to evaluate more permanent options for interruptible-service offerings with understandable and manageable criteria both for price-based curtailments and for returning interrupted customers to service. In evaluating longer-term options, CenterPoint proposed to (1) analyze average cost and marginal cost conditions under which price-based curtailment could be performed and provide a benefit to firm sales customers, (2) analyze the frequency and duration of likely curtailments under the proposed curtailment criteria and discuss with interruptible customers whether this level of curtailment would be feasible for them, (3) evaluate what changes in pricing and terms would be appropriate for service subject to price-based interruption, and (4) evaluate the range of potential cost savings that could be achieved through the future use of price-based interruptible service.

B. Comments

1. The Department

The Department generally supported the utilities pursuing strategic curtailment to mitigate exposure to the risk of high spot-gas prices. However, for the same reasons it opposed the use of an objective price-based threshold generally, the Department opposed the utilities' proposed amended interruptible tariff language because it would too narrowly tie this use of curtailment to the preceding day's index prices reaching a predetermined threshold.

Instead of employing the proposed amended tariffs, for the current season, the Department recommended that the utilities pursue economic curtailments under their existing tariffs when it would be prudent to do so under the circumstances.

For future seasons, the Department recommended that the utilities explore the development of new interruptible-service offerings designed to facilitate a reasonable degree of economic curtailments.

For future interruptible-service offerings, the Department supported CenterPoint's approach of identifying specific classes of interruptible customers that would be the best candidates for economic curtailments—particularly those that had the most experience curtailing successfully—and focusing economic curtailments on those classes to the extent reasonable. The Department contended that this type of tailored approach could allow deeper discounts for customers who have the flexibility to accommodate more frequent curtailments, while offering a more moderate interruptible-service option for customers who prefer less frequent curtailments.

Further, the Department asserted that focusing planned economic curtailments on a subset of interruptible customers could allow the utility to reserve a subset of interruptible load to call on in case unforeseen circumstances cause supply to fall short of demand.

2. The OAG

Citing the Commission's October 19 orders in these dockets, the OAG asserted that tariff revisions are not necessary because the utilities' existing interruptible tariffs already afford the utilities broad discretion to determine when it is appropriate to curtail interruptible customers, including to mitigate the effects of extreme price spikes. However, the OAG stated that it would be reasonable to modify the tariff language to contemplate economic curtailments more explicitly to eliminate any potential for confusion among the utilities or their customers.

The OAG opposed the utilities' proposed amended tariffs because they would strictly base curtailment decisions on a formulaic price threshold. The OAG argued that it would be unreasonable for the utilities to rigidly, arbitrarily limit their ability to use curtailment for economic reasons while their tariffs impose no such limits on curtailment for other reasons.

As a solution to the utilities' concerns that customers may be less willing to curtail when called to do so for price-based reasons than for other reasons, thus making this type of curtailment less reliable, the OAG proposed adopting stronger penalties for curtailment violations. The OAG recommended that the Commission institute a "probationary period" for all gas utilities under which any interruptible customer that repeatedly fails to curtail when called to do so will be charged firm-customer rates until the customer demonstrates that the problem that was causing the failures has been resolved.

3. CUB

CUB recommended that each utility consider developing two distinct interruptible-service offerings, with one focusing on curtailment for economic reasons and the other focusing on curtailment to address reliability issues. CUB proposed that the "economic" interruptible tariff could include different terms such as allowing more frequent curtailments or shorter notice in exchange for a higher rate discount than the "reliability" tariff.

CUB recommended that any economic interruptible tariff include non-binding criteria to give customers general notice as to when they might expect to be curtailed, but not strictly preclude curtailment based on the non-occurrence of those criteria if curtailment would otherwise be prudent under the totality of the circumstances. CUB opposed the utilities' proposal to strictly limit the use of economic curtailment based on a predetermined price threshold.

CUB argued that offering different interruptible service options focused on different utility needs could address concerns raised by some utilities that price-based curtailment could result in more frequent curtailments, which could incentivize some customers to switch to firm service, thus undermining the utility's overall ability to address system concerns using curtailment. Offering multiple interruptible-service options for different circumstances could give customers flexibility to select a model compatible with their needs, which could help utilities retain interruptible customers while maintaining their ability to curtail effectively to address a variety of concerns.

C. Commission Action

For reasons discussed above regarding the utilities' proposed two-part price-threshold approach, the Commission will not approve the proposed amended interruptible tariffs, which would strictly tie curtailment decisions to the same price threshold without persuasive data showing that these thresholds would achieve the intended ratepayer protections.

As the Commission determined in its October 19 orders in these dockets, the affected utilities' existing tariffs confer broad authority to curtail interruptible customers when the utility deems it appropriate and do not preclude the use of curtailment as a tool to reduce exposure to extraordinary gas prices. The utilities are expected to make prudent curtailment decisions under their existing tariffs, considering market conditions and other relevant factors, to help them fulfill their obligations to provide safe, reliable service at just and reasonable rates.[1]

However, the Commission agrees with the parties that customers may benefit from revised tariff language that provides more clarity about what to expect from interruptible service.

Additionally, it is worth exploring questions raised in this docket about whether new or alternative interruptible-service terms could protect customers more effectively against adverse impacts from future price spikes in a way that is viable for interruptible customers while meeting the needs of firm customers and the utility's system.

The Commission will therefore require each utility, no later than its next rate case, to update its interruptible tariffs to ensure that customers understand the possibility of curtailment for economic reasons. The utilities will also be required to file proposals for new or alternative interruptible tariffs that include additional provisions that could protect against adverse effects from future gas price spikes.

IV. Other Plans and Annual Filings

A. The Utilities' Plans

In addition to the proposed interruptible-tariff changes discussed above, the affected utilities summarized other changes they have recently implemented, plan to implement, or are considering for possible future implementation that could better protect customers from exposure to high prices in the spot market for natural gas. Xcel, MERC, and Great Plains generally stated that they intend to pursue the identified changes without requesting approval from the Commission. In contrast, CenterPoint requested Commission approval of certain changes and stated that it would implement them only if the Commission specifically approves and directs the utility to implement those changes.

1. Xcel

To enhance the geographic diversity of its supply options so it can reduce exposure to price spikes at any single trading hub, Xcel stated it acquired incremental backhaul firm transportation entitlement on the Viking pipeline beginning in the current heating season, which provides additional access to gas supply from Chicago markets. Additionally, for the 2023–2024 heating season, Xcel acquired additional firm transportation entitlement on the Viking pipeline, which will improve its ability to access supply from the Emerson hub.

Xcel stated that it recently changed its load forecasting to incorporate its own internal weather forecast, providing more localized expertise than the third-party forecasts it formerly used, which should generate more accurate predictions of how much gas supply the utility needs to procure.

Additionally, Xcel stated that it will continue to evaluate the feasibility and prudence of procuring additional storage in the future to reduce its reliance on spot gas when prices are likely to be high.

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[1] *See* Minn. Stat. § 216B.03; Minn. R. 7825.2390.

Xcel stated that it is evaluating the potential to use its Wescott liquefied natural gas (LNG) peaking plant for cost mitigation starting in the 2023–2024 heating season, but only when prices reach the two-part threshold discussed above, and only if Xcel deems it appropriate to do so at the time considering the level of LNG inventory and operational and safety considerations.

Xcel also filed a communications plan and provided templates to guide the communications it will send to customers when index prices reach the threshold identified above. Xcel noted that these customer communications will have limited impact on its ability to reduce gas supply purchases at present because there is currently insufficient evidence to rely on customers to comply with voluntary price-based conservation requests. However, Xcel suggested that it could gain a better understanding by studying how customers respond when these communications are issued over time. Xcel proposed that, depending on customer response, it may be able to use conservation communications to mitigate gas costs to some degree in the future.

With respect to financial hedging strategies, Xcel suggested that it may be in the public interest to develop a new regulatory process that would allow utilities to receive feedback on their financial hedging plans from stakeholders and the Commission in a more regular and expeditious manner. Under the current system, the Commission reviews Xcel's financial hedges in variance requests to recover hedging costs through the purchased-gas adjustment every three to four years—which Xcel argued is too infrequent to react to the changing market—and in annual automatic adjustment dockets in which the utility files its Gas Price Volatility Mitigation Plan from the prior year—which Xcel argued are not a good mechanism for timely feedback because they occur only after the fact.

2. MERC

MERC stated that it has recently modified its practices to improve pricing stability and reduce exposure to high spot-gas prices by increasing its baseload purchases priced at first-of-month index prices and increasing the limit of one of its storage resources by 5,000 Dth/day.

Additionally, MERC stated that it has updated its daily forecasting tools to identify changes to transportation-customer gas deliveries more easily, which will help improve the accuracy of its forecasting of the gas supply needs for sales customers. This improved accuracy could potentially allow MERC to reduce the amount of gas it purchases in excess of actual customer needs in some cases.

MERC also stated that it continues to seek additional available storage that could be incorporated at reasonable cost, and it is evaluating potential changes to its transportation tariffs that could ensure that transportation customers deliver the volumes they intend to use to avoid pipeline imbalance issues. MERC also stated that it will continue to review the availability of more protective financial hedging products.

3. Great Plains

Great Plains stated that it has implemented a plan to increase its peak winter-month baseload supply to reduce its reliance on the daily spot market when gas prices are expected to be high.

Additionally, Great Plains stated that it has shifted away from its former practice of prescriptively withdrawing storage uniformly each day from December through February, toward instead generally reducing storage usage earlier in the winter to preserve more inventory for colder, higher-demand, higher-priced months and days that may occur later in the winter.

4. CenterPoint

CenterPoint proposed to implement the following changes designed to reduce spot-gas purchases in the event of extraordinarily high gas prices, but it stated that it would implement these practices only if the Commission specifically approves and directs their implementation:

- Price-based withdrawals from Waterville storage—CenterPoint would plan to withdraw up to 5,000 Dth/day of incremental storage gas above the current planned operational maximum withdrawal of 50,000 Dth/day from its Waterville storage the day after the occurrence of an index price meets the two-part economic trigger discussed above; and
- Price-based dispatch of LNG peak shaving—After January 20, CenterPoint would plan to dispatch up to 25% (18,000 Dth/day) of its total daily LNG capacity beginning the day after an index price meeting the two-part economic trigger occurs.

CenterPoint stated that it has already implemented, or plans to implement, the following changes without requesting Commission approval:

- Increased first-of-month baseload supply purchases, based on a "normal" weather scenario rather than the forecasted warmest day each month;
- Increased baseload hedges;
- Increased supply diversity, blending baseload and daily index purchases between CenterPoint's primary receipt points on the Northern Natural Gas and Viking pipelines so it can maximize supply deliveries from the location that has the lower index price in the event of significant disparities;
- Hedging optimization, including heavily weighting the portfolio toward fixed-priced products;
- Increased diversity of hedges; and
- Executing longer-term hedges effective April 2023 to secure longer-term price protections and lower prices.

Additionally, CenterPoint described its new customer communication campaign, which aims to raise customer awareness of available tools such as bill assistance and affordability programs, levelized billing, energy efficiency tips, and conservation improvement program offerings, which could mitigate the impact of price spikes on customers who participate in these programs.

CenterPoint also stated that its long-term considerations for future heating seasons include evaluating whether to increase firm pipeline entitlements for storage withdrawals and expand the capacity of its Waterville storage facility; studying the feasibility of upgrading its LNG peaking plant to increase the maximum single-day output; exploring possible modifications to the terms of its gas-supply contracts; and examining ways to further diversify its gas supply sources.

B. Comments

1. CUB

CUB generally supported Xcel's and CenterPoint's plans to use LNG peaking plants to mitigate customer impacts from future price spikes, but it opposed their proposals to tie these decisions strictly to the occurrence of a designated price level the preceding trading day. Opposing both the fixed price threshold proposed by both utilities, and the strict seasonal cutoff date proposed by CenterPoint, CUB maintained that the utilities must make peaking-dispatch decisions on a case-by-case basis considering the totality of the economic and situational context of the utility and the market. CUB recommended that the Commission require Xcel and CenterPoint to file more dynamic proposals for price-based dispatch of peaking resources consistent with these principles.

To incentivize utilities to minimize exposure to future gas price spikes, CUB recommended that the Commission require the affected utilities to work with stakeholders to propose a risk-sharing mechanism in their next annual-automatic-adjustment filings. For example, a risk-sharing mechanism could allocate a fixed percentage of any variance in fuel costs to the utility, which could be capped at an annual dollar amount. CUB asserted that the utility should be assigned a risk level that is sufficient to align utility financial incentives with customer interests.

2. The OAG

The OAG urged that any Commission approval of prospective operational changes should not alter the utilities' existing obligations to exercise prudent judgment in any future pricing events. Utilities must always balance safety, reliability, and just and reasonable rates under all relevant circumstances. The OAG therefore argued that there is little value in approving any prescriptive, objective plan binding a utility to take a predetermined action under future circumstances that are not yet fully ascertainable.

However, the OAG supported Xcel's plan to continue to examine whether and how financial hedging can be used to protect ratepayers from exposure to future price spikes and recommended that all the affected utilities take further steps to optimize their hedging strategies.

3. The Department

Although none of the utilities reported any success with these efforts to date, the Department recommended that the utilities continue to pursue non-standard options for gas-supply contracting that could provide greater protection against daily price spikes.

Further, because the utilities maintained that contracts with more protective terms are not available, the Department recommended that the utilities participate in the North American Energy Standards Board (NAESB) gas/electric harmonization forum. NAESB is the industry group that generally defines the terms of industry-standard gas-supply contracts, and its gas/electric harmonization forum has been meeting to discuss reforms to the gas and electric industries. The Department recommended that the utilities pursue reforms to the NAESB standard contract force majeure language to provide greater supply commitment and certainty during extreme cold events, which could help insulate gas-utility customers from extraordinary cost impacts from future price spikes.

To improve pricing stability, the Department supported the plans of CenterPoint, MERC, and Great Plains to meet a greater portion of their overall gas supply needs with baseload purchases at first-of-month index prices or other fixed prices, and it recommended that Xcel consider doing the same. The Department recommended that the utilities consider purchasing baseload supply above their projected minimum daily load, stating that any excess supply can be injected into storage, sold back to the market, or otherwise managed using the flexibility in their pipeline contracts on warmer days.

As another strategy to reduce the risk of needing to purchase large volumes of spot gas on cold days when prices are likely to be high, the Department supported Great Plains' plan to modify its storage-withdrawal strategy to preserve more inventory for colder late-winter months. It recommended that the other utilities also explore potential modifications to optimize their storage-management strategies.

The Department also recommended that the utilities commit to improving their supply-reserve-margin practices to minimize the volume of gas they purchase in excess of customer needs to the greatest extent reasonable, and be prepared to explain their supply reserve margins in the future. As the prudence reviews leading up to this proceeding showed, planning for an unreasonably high reserve margin can lead a utility to incur substantial unjust costs purchasing unnecessary volumes of gas, particularly when spot-market prices are extraordinarily high. More careful planning of supply reserve margins thus can help a utility avoid incurring unreasonable costs.

Because having access to geographically diverse supply options can reduce a utility's exposure to a price spike at any single trading hub, the Department recommended that the affected utilities consider supply diversity when reviewing, modifying or expanding their pipeline capacity and include their future contract demand entitlement filings discussions of how changes to pipeline capacity affect their supply diversity.

The Department supported CenterPoint and Xcel using their LNG peaking plants to reduce reliance on spot-gas purchases if prudent when index prices are expected to be high; however, the Department opposed adhering to the two-part price threshold in these decisions and opposed CenterPoint's proposals to limit economic dispatch to 25% of its daily LNG capability and to only consider it after January 20 in a heating season. Instead of adhering to these prescriptive parameters, the Department recommended that the utilities make peaking-dispatch decisions on a case-by-case basis considering the circumstances of the event, the prevailing winter, and the status of fuel inventory.

Additionally, the Department supported Xcel's plan to communicate conservation requests to customers in anticipation of extreme spot-gas price spikes and to study customer responses to evaluate whether this may be a reliable tool to reduce spot-gas expenditures in the future. The Department recommended that CenterPoint, MERC, and Great Plains develop their own plans to communicate conservation requests to customers and to study customer responses.

Further, to improve gas-utility planning and transparency generally, the Department recommended that the utilities expand their relevant annual, forward-looking gas planning or hedging filings to illustrate their expected supply mix across different load and weather conditions throughout the winter, and provide for each month of the upcoming winter season the forecasted minimum, average, and maximum daily load requirements and the expected mix of baseload, storage, and spot supply on those days.

C. Commission Action

1. CenterPoint's Requests for Approval of Changes

The Commission will not grant the specific approvals that CenterPoint requested to prescribe certain actions relating to peaking plants and storage after an index price reaches a designated threshold. The proposed actions that are the subject of CenterPoint's request may be prudent under some circumstances; however, it is the utility's responsibility to determine whether to take such actions on a case-by-case basis, applying prudent judgment to all relevant facts, using its technical expertise and industry experience.

2. Other Plans and Annual Filings

The Commission appreciates the attention and effort all parties have shown in reviewing current gas utility practices and developing plans to better protect customers. The record developed in this proceeding contains promising ideas and strategies that the utilities will be encouraged to pursue consistent with this order.

The Commission agrees with the Department that the affected gas utilities should participate in NAESB's Gas/Electric Harmonization Forum and other relevant efforts to pursue beneficial reforms in the gas industry. Because gas prices are influenced by outside factors beyond the control of Minnesota gas utilities or of this Commission, broader external changes in the industry may be a crucial component for reducing Minnesotans' exposure to high gas prices in the future. The Commission will therefore require CenterPoint, Xcel, MERC, and Great Plains to participate in reform efforts as set forth in the ordering paragraphs below.

Further, the Commission broadly agrees with the Department's comments regarding strategies the utilities should consider as tools for reducing exposure to price spikes in the daily spot market. For the reasons discussed in the Department's comments, which find further support throughout the records developed in these five dockets, the Commission will require the affected utilities to:

- Continue exploring the availability and cost of contracting, hedging, and supply options that would provide better protection against price spikes;
- Consider varying their baseload supply planning to incorporate a greater degree of baseload purchases to reduce reliance on daily spot-market gas and explain these plans;
- Explore modifications to storage inventory management that could preserve withdrawal capacities for later in the winter heating season;
- Commit to improving their supply-reserve-margin practices to minimize these quantities to the greatest extent reasonable, and be prepared to explain the level of their supply reserve margins in the future;
- In future contract demand entitlement filings, discuss how changes to their pipeline capacity affect their supply diversity and, if pipeline capacity comes at a cost premium

but increases supply diversity, provide a meaningful cost-benefit discussion, including a comparison with the least-cost capacity option; and

- Include in their relevant annual, forward-looking gas planning or hedging filings the utility's expected supply mix across different load and weather conditions throughout each month of the upcoming winter season; the forecasted minimum, average, and maximum day load requirements; and the expected mix of baseload, storage, and spot supply on those days.

Additionally, the Commission will require the affected utilities to design plans for studying customer responses to utility communications asking customers to conserve gas in anticipation of price spikes. Although the utilities expressed reasonable reservations about reducing gas supply purchases in reliance on voluntary customer conservation, the Commission finds it reasonable to begin exploring the potential value of customer conservation communications as a tool for mitigating customer impacts from extraordinarily high gas prices.

With respect to peaking plants, the Commission agrees with the Department and CUB that the proposals to limit the economic dispatch of these plants to situations in which a predetermined price threshold has been met are likely less effective than decisions informed by all relevant circumstances on a case-by-case basis. The Commission will therefore require Xcel and CenterPoint to make prudent decisions about peaking-plant dispatch based on the circumstances of the event, the prevailing winter, and the status of the utility's fuel inventory. CenterPoint and Xcel will be required to file more dynamic proposals recognizing that decisions to call on peaking resources depend on the economic and situational context of the utility and the market.

To monitor and evaluate the utilities' compliance with this order and progress toward better customer protection, the Commission will require each affected gas utility to make an annual filing, by August 1 each year, detailing the utility's recent efforts to protect ratepayers from future price spikes in the market for natural gas and addressing recommendations that parties have made in this proceeding. At a minimum, these annual filings shall include updates on each item identified in this section, except where this order specifies a different filing location for a particular item.

V. Market Event Filings

A. CUB's Proposal

To improve transparency and accountability going forward, CUB recommended instating an informational filing requirement for future price spikes. Under CUB's proposal, if the settled Gas Daily index price at a hub where a utility purchased daily gas supplies to serve Minnesota customers reaches or exceeds $20.00/Dth, the utility would be required to make a filing to the Commission within 60 days. The filing would identify the costs the utility incurred while prices were at or above the threshold level, explain what actions the utility took to account for or mitigate those costs, and provide justifications demonstrating why the utility's actions were prudent.

CUB contended that this automatic filing requirement would make it easier for the Commission and stakeholders to evaluate the need for further prudence review and hold utilities accountable for adhering to applicable standards of conduct.

B. Comments

CenterPoint, MERC, and Xcel argued that the formal filing requirement proposed is unnecessary because it is already their practice to communicate promptly with regulatory agencies when extreme events occur. They also expressed concerns that setting too low of a price threshold for this kind of filing requirement could lead to excessively frequent filings, which could inadvertently lead to the filings being treated as routine, detracting attention and resources from the most extreme events.

The Department and CUB shared the concern that setting a threshold price that is so low that the filings become routine could detract from the effectiveness of this tool, but they countered that setting the price threshold too high could also limit the value of this review process.

C. Commission Action

The Commission agrees with CUB that it is in the public interest to require the affected utilities to file information about notable pricing events, including the costs incurred, the utilities' handling of the situation, and the prudence of the utilities' actions. Establishing a requirement that the affected utilities notify the Commission of extraordinary pricing events and explain the prudence of their actions will help improve transparency and accountability regarding utility responses to high spot-gas prices.

Further, this requirement will facilitate convenient, public access to information that the Commission and stakeholders need to monitor the utilities' handling of extraordinary events and determine whether further prudence review is appropriate in a particular case.

However, the Commission is not persuaded to adopt the proposed threshold price of $20.00/Dth. Due to fluctuation and upward trends in natural gas prices as well as general market inflation, a flat dollar-amount threshold may not provide a clear picture of the relative severity of elevated prices in a particular trading period and may become obsolete in the near future.

Instead, the Commission finds it reasonable to set a variable threshold that can adjust over time in relation to prevailing gas prices. The Commission will therefore set the threshold for this filing at any price that exceeds five times the average price of gas in the utility's filed purchased-gas adjustment for the month when the gas was purchased. Five times the average price is a reasonable threshold that will identify events that are significant enough to warrant a degree of special review without resulting in filings that are so frequent as to diminish their value.

The Commission will also modify CUB's proposed deadline and require these filings within 14 days of a price meeting the threshold. A 14-day timeframe will provide utilities a reasonable amount of time to gather and develop the requisite information while allowing for timely Commission analysis and action.

Accordingly, when a utility in this docket pays a price on the daily spot market exceeding five times the average price of gas in the utility's filed purchased-gas adjustment for that month, the Commission will require the utility to make a filing within 14 days that (1) identifies the costs the utility spent on gas for Minnesota customers while gas prices were above the threshold level, (2) discusses what actions the utility took to account for or mitigate those costs, and (3) explains why the utility's actions were prudent.

The adoption of this filing requirement should not alter the utilities' current informal practices of more immediate communication with agencies as appropriate when extreme or unusual pricing or other events occur.

VI. Resource Planning

The Commission requested comments regarding whether the affected utilities should incorporate resource planning as a tool to help protect customers from price spikes in the market for natural gas. Minnesota's gas utilities historically have not been required to engage in resource planning.

Resource planning generally refers to the concept of identifying and analyzing mixes of resource options a utility could use to meet the service needs of its customers over a long-term forecast period under various possible supply-and-demand scenarios. A resource plan typically includes a mix of supply-side resources (e.g., using, modifying, or constructing utility plant and equipment or buying power or fuel from other sources) and demand-side resources (e.g., implementing energy conservation or controlling customer loads).

Some Minnesota electric utilities are required to file resource plans periodically discussing resource mixes they could use to meet customer needs over a forecast period of 15 years.[2] The Commission sets substantive and procedural requirements for each electric utility's plan and conducts proceedings to review them, including opportunities for stakeholders to comment and propose alternative plans.[3] The Commission then issues findings and conclusions and may identify a preferred resource plan based on the record.[4]

Minnesota electric utilities' plans are evaluated on their ability to maintain or improve the adequacy and reliability of service; keep customer bills and rates as low as practicable; minimize adverse socioeconomic and environmental effects; enhance the utility's ability to respond to changes in financial, social, and technological factors; and limit the risk of adverse effects on the utility and its customers from factors the utility cannot control.[5]

A. Comments

1. CenterPoint, MERC, and Great Plains

CenterPoint, MERC, and Great Plains each recommended against requiring resource planning for gas utilities, arguing that it would not be an effective tool to reduce customer exposure to high gas prices and market volatility, especially in the near term.

CenterPoint claimed that, although resource planning works well for electric utilities—which typically own and control generation facilities in addition to handling transmission and distribution to customers—gas utilities focus on procuring fuel from third parties at competitive prices in wholesale commodity markets and, thus, do not have control over decisions analogous

[2] *See* Minn. Stat. § 216B.2422; Minn. R. 7843.0100, subp. 6; Minn. R. 7843. 0300.

[3] *See* Minn. R. ch. 7843.

[4] Minn. R. 7843.0500, subps. 1–2.

[5] *Id.*, subp. 3.

to the long-term generation-capacity decisions that electric utilities focus on in their resource plans.

CenterPoint argued that gas utilities' shorter planning horizons, lack of vertical integration, and focus on supply procurement and distribution-system expansion as opposed to generation-capacity expansion, makes the resource plan model a poor fit for gas utilities. It also argued that wholesale gas markets do not have the same comprehensive overview and control as organized electric power markets, which would add to the difficulties of undertaking a comprehensive view of each gas utility's overall planning. Based on these differences, CenterPoint argued that a gas resource plan would not be a useful tool to protect gas-utility customers from high gas prices.

MERC contended that it would be difficult to engage in long-term gas resource planning because of market volatility, changes in market product offerings, and the fact that gas supply procurement decisions generally must be made on a short timeframe in a competitive market.

Further, CenterPoint, MERC, and Great Plains argued that the annual, seasonal, and monthly supply planning they engage in already incorporates many of the considerations that would be included in a resource plan. CenterPoint and MERC also contended that the Commission receives much of the information a resource plan would contain through annual gas procurement plans, demand entitlement filings, monthly purchased-gas adjustment filings, annual automatic adjustment proceedings, certificate-of-need proceedings for capital investments, and annual service-quality reports. They contended that a comprehensive plan discussing much of the same information would not provide significant added benefits over these existing filings.

Great Plains acknowledged that a resource plan could present an opportunity for economic evaluation of demand-side management programs designed to narrow the gap between normal and peak-day demand, which could reduce the amount of spot gas or swing gas a utility needs to purchase above its monthly base supply and, thus, could mitigate customer exposure to the effects of extraordinarily high gas prices. However, Great Plains contended that the potential value and effectiveness of this tool is limited because it cannot prevent or reduce the occurrence of high pricing, which is a function of market supply and demand.

Similarly, although CenterPoint acknowledged that resource plans may allow more comprehensive Commission review of overall gas utility planning and provide insight for additional review of gas infrastructure, capacity, and supply planning, the utility maintained that resource plans would not offer new solutions to mitigate extraordinary pricing events or their effects on customers.

Asserting that developing and implementing a resource-planning framework for gas utilities would require significant investments of time and resources for all stakeholders, CenterPoint, MERC, and Great Plains questioned whether the uncertain benefits would justify the cost.

CenterPoint and MERC recommended that, if the Commission is interested in pursuing further discussion of gas resource plans, that discussion should occur within the broader evaluation of changes to natural-gas regulatory and policy structures in the Future of Gas Docket.[6]

[6] The Commission opened the Future of Gas Docket, docket no. G-999/CI-21-565, pursuant to the Natural Gas Innovation Act, Minnesota Laws 2021, 1st Special Session, ch. 4, art. 8, §§ 20–21, 27,

2. The Department

The Department recommended that the Commission not pursue the concept of gas resource planning as a tool to prevent against future price spikes in the market for natural gas. Echoing CenterPoint's description of the differences between the electric and gas utility industries, the Department agreed with CenterPoint that the model of long-term resource planning is not well suited to preventing gas price spikes and may not be a useful planning tool for gas utilities.

However, the Department stated that it would participate in any proceedings to develop gas resource planning requirements if the Commission moves forward with this approach.

3. Xcel

Xcel supported discussing natural-gas resource planning in the future, but it recommended waiting to make decisions on this subject while important policy discussions progress in the Future of Gas Docket and in other dockets expected to open in 2023 relating to utility innovation plans under the Natural Gas Innovation Act and conservation plans under the Energy Conservation and Optimization Act.[7] Xcel asserted that decisions made in these dockets should shape and inform the parameters of any gas resource planning process and recommended moving the discussion to one of these dockets for further development.

4. CUB

CUB recommended that the Commission commence a proceeding to develop requirements for gas resource planning and require gas utilities to file resource plans.

Describing the process as an opportunity for a utility to explain its planning and operations to the public, stakeholders, and the Commission, CUB argued that gas resource planning would put each utility, the Commission, and the community in a better position to mitigate the effects of price spikes in the market for natural gas.

Although some elements of a resource plan can be found in other gas utility filings and dockets, CUB argued that no existing filing or docket captures the full value that a comprehensive resource plan could provide. Unlike the gas utilities' current planning practices, which focus on short-term needs, resource plans take a more holistic look at long-term decision-making, including assessing the costs and risks of various portfolios of resources. For example, a gas utility's resource plan could evaluate and compare the risks of different supply basins, transportation pipelines, and physical and financial hedging strategies under various future scenarios. The utility could then use the results of this analysis to develop a comprehensive strategy to guide its shorter-term contracting and operational decisions.

CUB contended that such plans could provide a clearer understanding of the relative value of different resource portfolios under a range of future scenarios, helping utilities to identify which

codified at Minn. Stat. §§ 216B.2427, 216B.2428. That act directs the Commission to evaluate changes to natural-gas regulatory and policy structures needed to meet state emissions-reduction goals.

[7] 2021 Minnesota Laws ch. 29, sec. 2–18, codified at Minn. Stat. §§ 216B.2401, 216B.2402, 216B.2403, 216B.241.

resources will best serve future energy needs and, potentially, which portfolio of resources could minimize the risk of impacts from future extreme pricing events. This type of information could in turn help utilities decide whether to increase investments in particular resources such as storage or peaking plants.

Further, CUB noted that, because each scenario tested includes assumptions about future circumstances that are largely beyond the utility's control—such as fuel prices, demand, technology costs, and policy changes—a resource plan serves as a centralized process for documenting the assumptions that underlie the utility's planning and decisions. CUB suggested that having this information publicly accessible in a single, centralized location could enhance the quality of stakeholder participation and Commission decision-making in other proceedings such as rate cases and prudence reviews. Further, it would require the utility to justify its methodology and data and provide stakeholders an opportunity to propose improvements and present alternative data.

CUB recommended that the Commission develop requirements for gas resource planning in a new, dedicated docket, separate from the Future of Gas Docket, to facilitate focused attention and record development in this important, complex area.

As a starting point, CUB summarized the process that one Oregon gas utility follows and proposed that the longstanding gas resource planning requirements in three U.S. states (Washington, Oregon, and Idaho) could serve as models for how to develop and implement gas resource planning requirements in Minnesota. Based on these examples, CUB recommended that a gas resource plan include the following:

(1) Discussion of the planning environment, including economic and demographic conditions, environmental policy, and new technologies.

(2) Load forecast, including customer forecast by class; use-per-customer assumptions by class; the utility's planning standard peak-day forecast, energy-planning standard, and capacity planning standard; and assessment of the ability of the utility's current portfolio to meet the load forecast.

(3) Assessment of commercially available demand-side resources.

(4) Assessment of commercially available supply-side resources.

(5) Portfolio selection and analysis, including various scenarios and sensitivities.

(6) An action plan including identification of specific actions the utility will take in the next one to five years.

Additionally, CUB stated that the utilities could include in their plans avoided cost estimates; a distribution-system analysis to identify key segments of the distribution system that will need to be upgraded in the near future and aid in identifying pipeline alternatives that can be used to delay, defer, or reduce planned distribution pipe upgrades; and a summary of stakeholder feedback along with the utility's responses to that feedback.

5. Center for Energy and Environment

Center for Energy and Environment (CEE) also recommended that the Commission establish a resource planning process for gas utilities and supported CUB's proposal. CEE asserted that long-term resource planning is a necessary and valuable tool to help Minnesota's gas utilities evolve to meet future energy needs safely, affordably, and reliably, while meeting greenhouse-gas reduction goals. This planning will become especially important as utilities increase their investments in new and innovative resources under the Natural Gas Innovation Act.

CEE argued that resource plans may play a role in protecting ratepayers from future price spikes in the geological natural gas market and, potentially, in markets for other resources such as renewable natural gas and hydrogen, by helping utilities plan to diversify their energy resources. Diversification of resources can create opportunities to offset a resource affected by a price spike by switching to another, similar resource that is not affected by the same market conditions at the time. Further, CEE argued that reducing Minnesota's overall reliance on geological natural gas may have broader market effects resulting in reductions in wholesale gas prices.

B. Commission Action

The Commission finds that natural gas resource planning is in the public interest because it will provide a better understanding of the relative value of possible resource portfolios under a range of future scenarios, which could help gas utilities identify which comprehensive strategies are likely to be most efficient and effective for adapting to the increasing frequency of extreme weather events and, further, to ongoing transitions in the natural gas and energy industries.

The Commission is not persuaded by arguments that the resource-planning model lacks the potential to protect gas utilities' customers. Comments in this docket identify multiple promising ways resource planning could be used to reduce exposure to high gas costs and market volatility, including by comparing the risks of different supply basins, transportation pipelines, and physical and financial hedging strategies under various scenarios to guide supply procurement and other shorter-term utility decisions; evaluating strategies to employ demand-side resources to reduce reliance on spot and swing gas; and exploring the incorporation of alternative resources such as renewable natural gas and hydrogen to diversify supply options.

To facilitate the process, the Commission will delegate authority to its Executive Secretary to commence, and set procedures and timelines for, a proceeding to establish content and procedural requirements for gas resource plans. The Commission agrees with CUB that developing the state's first resource-plan requirements for gas utilities is a significant undertaking that merits focused attention and robust record development, and that a dedicated proceeding outside of the Future of Gas Docket will be the best forum for accomplishing those objectives in this case. CUB's comments on processes and content will serve as a starting point for the notice and request for comments in the new proceeding.

Because developing and implementing requirements for gas resource planning will be a new and complex endeavor, the initial proceeding to establish resource-plan requirements will focus on the state's three largest gas utilities—CenterPoint, Xcel, and MERC. As a smaller utility, Great Plains stated that it often looks to its larger counterparts for guidance in areas of major change and innovation. The Commission finds it reasonable to defer any action on resource-planning requirements for Great Plains and other gas utilities and proceed first with the larger utilities.

Additionally, to ensure that the Department has the resources to fully engage in the proceeding, consistent with Minn. Stat. § 216B.62, subd. 8, the Commission will authorize the Department to request permission from the Commissioner of Management and Budget to incur costs for specialized technical and professional investigative services to assist with any proceedings related to natural gas utility planning.

The Commission expects to consider comments, establish requirements, and set filing deadlines for each individual utility's initial resource plan within 18 months.

ORDER

1. The Commission does not approve the economic trigger for interruptible customer curtailment proposed by CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas; Northern States Power Company d/b/a Xcel Energy; Minnesota Energy Resources Corporation; and Great Plains Natural Gas Co.

2. No later than its next rate case, each gas utility in this docket shall update its existing interruptible tariffs to ensure customers understand the possibility of economic interruptions and propose new or alternative interruptible tariffs that include additional economic curtailment provisions that could protect the system from future price spikes.

3. If a gas utility in this docket pays prices on the daily spot market that exceed five times the average price of gas in the utility's filed purchased-gas adjustment for the current month when the gas was purchased, the utility shall make a filing to the Commission within 14 days identifying:

   A. Its costs for procuring gas for Minnesota customers while gas prices were inflated above this amount,
   B. What actions the utility took to account for or mitigate those costs, and
   C. Justifications for why its actions were prudent.

4. The gas utilities in this docket shall participate in the North American Energy Standards Board Gas/Electric Harmonization Forum and other relevant efforts to track and pursue beneficial reforms, such as improving the force majeure language in the NAESB standard contract.

5. The gas utilities in this docket shall continue exploring the availability and cost of contracting, hedging, and supply options that would provide better protection against price spikes.

6. The gas utilities in this docket shall consider variations to, and explain their plans to, incorporate a greater degree of baseload purchases.

7. The gas utilities in this docket shall explore modifications to storage inventory management that could preserve withdrawal capabilities for later in the winter.

8. The gas utilities in this docket shall commit to improving their supply reserve margin practices to minimize these quantities to the greatest extent reasonable and be prepared to explain the level of their supply reserve margins in the future.

9. In future contract demand entitlement filings, the gas utilities in this docket shall discuss how changes to their pipeline capacity affect their supply diversity and, if pipeline capacity comes at a cost premium but increases supply diversity, provide a meaningful cost/benefit discussion of the tradeoff, including a comparison with the least-cost capacity option.

10. Each gas utility in this docket shall include in its relevant annual, forward-looking gas planning or hedging filings:

    A. Its expected supply mixes across different load and weather conditions throughout each month of the upcoming winter season;
    B. The forecasted minimum, average, and maximum day load requirements; and
    C. The expected mix of baseload, storage, and spot supply on those days.

11. The gas utilities in this docket shall design plans that study customer responses to conservation calls.

12. CenterPoint shall use the circumstances of the event, the prevailing winter, and the status of its fuel inventory to inform its peak-shaving dispatch decisions.

13. Xcel shall use the circumstances of the event, the prevailing winter, and the status of its fuel inventory to inform its peak-shaving dispatch decisions.

14. Xcel and CenterPoint shall file dynamic proposals for calling on peaking resources that recognize that these decisions depend on the economic and situational context of the utility and the market.

15. By August 1 of each year, each gas utility in this docket must make an annual compliance filing that details its recent efforts and addresses parties' recommendations made in this proceeding.

16. The Commission finds that natural gas resource planning is in the public interest and delegates authority to its Executive Secretary to begin a proceeding to establish the content and procedural requirements for natural gas resource plans for CenterPoint, Xcel, and MERC, and to identify existing regulatory requirements that should be included in future resource planning. The starting point for the notice should be based on the comments and proposal filed on October 14, 2022, by the Citizens Utility Board of Minnesota in this proceeding. The Commission delegates authority to the Executive Secretary to establish timelines and procedural requirements for the proceeding as necessary.

17. Consistent with Minn. Stat. § 216B.62, subd. 8, the Commission authorizes the Commissioner of the Department of Commerce to ask the Commissioner of Management and Budget for permission to incur costs for specialized technical and professional

investigative services to assist with matters related to any proceedings related to natural gas utility planning.

18. This order shall become effective immediately.

BY ORDER OF THE COMMISSION

Will Seuffert
Executive Secretary

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CERTIFICATE OF SERVICE

I, Robin Benson, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission
ORDER REQUIRING ACTIONS TO MITIGATE IMPACTS FROM FUTURE NATURAL GAS PRICE SPIKES, SETTING FILING REQUIREMENTS, AND INITIATING A PROCEEDING TO ESTABLISH GAS RESOURCE PLANNING REQUIREMENTS

Docket Numbers: **G-999/CI-21-135; G-008/M-21-138; G-004/M-21-235; G-002/CI-21-610; G-011/CI-21-611**

Dated this **17th** day of **February, 2023**

/s/ Robin Benson

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-138_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_21-138_Official Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-138_Official Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-138_Official Service List
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Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-138_Official Service List
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_21-138_Official Service List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-138_Official Service List
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-138_Official Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-138_Official Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-138_Official Service List
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-138_Official Service List
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-138_Official Service List
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_21-138_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-138_Official Service List

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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-138_Official Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-138_Official Service List
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
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Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings	600 N. Robert St. St. Paul, Mn. 55101	Electronic Service	No	OFF_SL_21-235_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-235_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-235_Official
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-235_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-235_Official
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_21-235_Official

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Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-235_Official
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	Yes	OFF_SL_21-235_Official
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-235_Official
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-235_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-235_Official
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-235_Official
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-235_Official
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_21-235_Official

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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-235_Official
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-235_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-235_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-235_Official
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-235_Official
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Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings	600 N. Robert St. St. Paul, Mn. 55101	Electronic Service	No	OFF_SL_21-610_Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-610_Official Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official Service List
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-610_Official Service List
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_21-610_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-610_Official Service List
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-610_Official Service List
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-610_Official Service List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-610_Official Service List
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official Service List
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-610_Official Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-610_Official Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-610_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-610_Official Service List
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Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_21-610_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-610_Official Service List
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Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-610_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official Service List
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Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-610_Official Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-610_Official Service List
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Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings	600 N. Robert St. St. Paul, Mn. 55101	Electronic Service	No	OFF_SL_21-611_Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-611_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-611_Official Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-611_Official Service List
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_21-611_Official Service List
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-611_Official Service List
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-611_Official Service List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-611_Official Service List
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-611_Official Service List
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-611_Official Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-611_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-611_Official Service List
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-611_Official Service List
Lisa	Peterson	lisa.r.peterson@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-611_Official Service List
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-611_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-611_Official Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-611_Official Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-611_Official Service List

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Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-611_Official Service List
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official Service List
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-611_Official Service List
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-611_Official Service List
Michael A.	Yuffee	michael.yuffee@bakerbotts.com	Baker Botts	700 K St NW Washington, DC 20001	Electronic Service	Yes	OFF_SL_21-611_Official Service List