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September 09, 2024

—Via Electronic Filing—

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

RE: PREFERRED DECISION OPTIONS
IN THE MATTER OF A COMMISSION INVESTIGATION INTO GAS UTILITY
RESOURCE PLANNING
DOCKET NO. G008,G002,G011/CI-23-117

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this letter to the Minnesota Public Utility Commission summarizing our Preferred Decision Options based on the August 29, 2024 Staff Briefing Papers, and for consideration in the September 12, 2024 Commission agenda meeting, in the Matter of a Commission Investigation into Gas Utility Resource Planning.

The absence of any decision option from our list of Preferred Decision Options does not necessarily indicate opposition; our goal is to avoid over-prescription and redundancy. Further, the Company largely agrees with the Joint Preferred Decision Options filed on September 9, 2024, with the noted exception of the investment threshold for an Expansion Alternatives Analysis. Xcel Energy's Preferred Decision Options are as follows:

1. Require gas utilities to include in their integrated resource plan a discussion of how equity was considered in the planning process.
13. Require Xcel to file its first gas IRP by October 1, 2026, and require the other two utilities to file their Plans on a 12-month cadence, beginning with CenterPoint on October 1, 2027, and MERC on October 1, 2028.

15. Clarify that, as used in ordering paragraph 51 of the Commission’s March 27, 2024 order in these dockets, “infrastructure costs” are the capital costs the utility would pay to do the project.
16. Clarify that, as used in ordering paragraphs 51 and 54 of the Commission’s March 27, 2024 order in these dockets, “Capacity Expansion Project, Resource Expansion, or New Resources” are individual projects, or a set of inter-related facilities needed to meet a specified capacity expansion need due to growth by existing or new customers and facilities.
19. Replace the section title immediately preceding ordering paragraph 51 of the Commission’s March 27, 2024 Order in these dockets with the following: Expansion Alternatives Analysis.

Xcel Energy Modified 20.

Replace ordering paragraph 51 of the Commission’s March 27, 2024 Order in these dockets with the following: Gas integrated resource plans shall include infrastructure projects related to resource expansion or new resources at or above a **\$1 million** threshold from which utilities select projects for an Expansion Alternatives Analysis. Utility resource plans shall include a discussion of the rationale for the projects selected for an Expansion Alternatives Analysis, and summary of the utility’s discussions with stakeholders throughout the selection process.

B. \$3 million for Xcel, **adjusted for inflation**

If the Commission should choose a \$1 million threshold, then the Company prefers this Decision Option:

H. \$1 million, **adjusted for inflation**, but no more than ten total projects must be considered for the EAA

25. Allow utilities to evaluate and select projects for an Expansion Alternatives Analysis below the established cost threshold.
46. Require utilities in their gas IRPs to consider the State’s economy-wide greenhouse gas reduction statutory goals consistent with Minn. Stat. § 216H.01 and 216H.02 using 2020 as the baseline year. Lifecycle GHG emission factors from filed Natural Gas Innovation

Act (NGIA) Plans can also be considered in resource analysis to ensure lower emissions on a lifecycle basis.

51. Require Xcel to report methane emissions from natural gas distribution system operations using recognized reporting protocols, such as 40 CFR Part 98, Subpart W, in the natural gas integrated resource plan and annual updates.
54. Require utilities to include in their gas IRPs additional information about upstream emissions data availability.
61. To estimate the environmental externality costs of resources options in gas IRPs, require utilities to use the most recent externality values adopted by the Commission in Docket No. E-999/CI-14- 643.
68. Delegate authority to the Executive Secretary to open a comment period in Docket Number E999/CI-07-1199 to consider and determine the appropriate data source and values for the regulatory cost of greenhouse gas emissions for natural gas resource planning through the upcoming docket to update the regulatory cost of carbon for electric resource planning.
91. For each project proposed in its preferred five-year action plan, require the utility to include justification of need, resource mix, project scope, construction timeline, cost estimates including any offsetting revenues and tax benefits, and a narrative discussion of any equity impacts the project may have.
94. Modify ordering paragraph 36 of the March 27, 2024 Order in these dockets as follows:
A utility shall include in its resource plan filing a nontechnical summary, not exceeding 25 pages in length, describing the utility’s resource needs, the resource plan created by the utility to meet those needs, the process and analytical techniques used to create the plan, activities required over the next five years to implement the plan, and the likely effect of plan implementation on electric rates and bills.
101. Authorize the Executive Secretary to create a “Comprehensive Gas IRP Requirements” document which reconciles the gas IRP requirements

established in the Framework Order filed March 27, 2024, and the additions and modifications to those requirements made above, and issue the document as an attachment to the Order. Delegate continuing authority to the Executive Secretary to update the Comprehensive Gas IRP Requirements document to reflect any future modifications or additions to the gas IRP requirements established in future Commission decisions, to be filed as an attachment to future orders establishing such changes.

The Company also supports the new decision option below, aimed at consolidating stakeholder engagement-related decision options, as discussed at the Gas Utility Innovation Roundtable Meeting on September 6, 2024.

CEE NEW: In developing their Integrated Resource Plan, the utilities will engage with stakeholder groups to provide information about the utilities' planning process and Expansion Alternative Analysis project selection, answer stakeholder questions, and seek stakeholder feedback to inform the resource plan. The stakeholder groups shall include, at minimum, relevant state agencies, clean energy advocates, consumer advocates, low-income and environmental justice advocates, organized labor, local governments, and business, and communities directly impacted or served by Expansion Alternative Analysis projects. In each resource plan, natural gas utilities will provide a narrative description of its outreach and engagement activities and a summary of stakeholder feedback.

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

Sincerely,

/s/

BRIA E. SHEA
REGIONAL VICE PRESIDENT, REGULATORY POLICY

Enclosure
cc: Service List

CERTIFICATE OF SERVICE

I, Marie Horner, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

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

Dated this 9th day of September 2024

/s/

Marie Horner
Regulatory Administrator

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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_23-117_Official List
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Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-117_Official List
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_23-117_Official List
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