

November 10, 2021

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G002/MR-21-679

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

A Petition by Northern States Power Company d/b/a Xcel Energy (NSP, Xcel Energy or the Company) for Approval of a New Base Cost of Gas for Interim Rates.

The Petition was filed on November 1, 2021 by:

Gail Baranko
Manager, Regulatory Project Management
Xcel Energy
414 Nicollet Mall, 401-7th Floor
Minneapolis, Minnesota 55401

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve as modified herein** Xcel Energy's base cost of gas filing and is available to answer any questions the Commission may have.

Sincerely,

/s/ Sachin Shah
Rates Analyst

SS/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G002/MR-21-679

I. INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (NSP, Xcel Energy or the Company), requests that the Minnesota Public Utilities Commission (Commission) approve a new base cost of gas (BCOG) to coincide with the proposed January 1, 2022 implementation of interim rates as requested in its general rate case, Docket No. G002/GR-21-678 (Docket 21-678). NSP filed its general rate case on November 1, 2021, the same day as its BCOG Petition. The Minnesota Department of Commerce, Division of Energy Resources' (Department) analysis of Xcel Energy's Petition is presented below.

II. DEPARTMENT'S ANALYSIS

Minnesota Rules part 7825.2700, subpart 2, requires a utility to petition for a new base cost of gas, submitted as a miscellaneous rate change, to coincide with the implementation of interim rates during a general rate proceeding. This Rule requires that "The base cost of gas must separately state the commodity base cost and the demand base cost components for each class." Through its review of Xcel Energy's Petition, and for the Petition's consistency with the calculations in the general rate case, the Department concludes that the Company has complied with these requirements through its Volume 3 – Required Information, Volume 4 – Test Year Workpapers, and Company witness testimonies, exhibits, and associated schedules of Benjamin C Halama (Exhibit ___ (BCH-1), Christopher J. Barthol (Exhibit___(CJB-1), and Michelle M. Terwilliger (Exhibit___(MMT-1), in its rate case filing¹; and through its supporting data and calculations provided in Attachments A through C in the Petition. (Also See Department Attachment 1). The Department discusses Xcel Energy's demand and commodity costs separately below.

A. DEMAND GAS COSTS

The Department reviewed Xcel Energy's Petition for consistency with the calculations in the rate case. The Department's analysis indicates that the information is generally consistent between the rate case and the base cost of gas filing with a minor rounding difference.² Xcel Energy calculated its demand cost of gas based on the demand entitlement units filed on October 29, 2020 in Docket No. G002/M-20-633 and that were approved by the Commission on April 27, 2021.

¹ See the Company's response to Department Information Request (IR) No. 7, included as Department Attachment 1.

² In the petition at Attachment B, the total demand costs are approximately \$66,581,624 and in the rate case for example in Direct Testimony of Michelle M. Terwilliger, Exhibit ___ (MMT-1), Schedule 5, the total demand costs embedded in the calculations are approximately \$66,581,441, resulting in a difference of \$184

The Department notes that the demand costs are based on the interstate pipeline rates of Northern Natural Gas (Northern or NNG), Viking Gas Transmission (VGT), Great Lakes Gas Transmission (GLGT), ANR Storage Company (ANRS) and Williston Basin Interstate Pipeline Transmission (WBI).

The Department notes that the Company has also used the design-day and associated jurisdictional allocations from the Company's most recent information from its demand entitlement filing in Docket No. G002/M-21-589 (Docket 21-589) filed on July 30, 2021 and supplemented on November 1, 2021. The Department will file its comments in Docket 21-589 later.³ The Company provides a description of the system demand cost calculation on pages 3 through 5 of its Petition.

Finally, in its review of demand costs, the Department found no inconsistencies between the sales forecast reported in the rate case filing and that which was presented in the base cost of gas Petition.

In CenterPoint Energy Gas Resources Corp., doing business as CenterPoint Energy Minnesota Gas BCOG filing in Docket No. G008/MR-17-591, Commission Staff in the August 25, 2017 Staff Briefing Papers, on page 3 stated the following:⁴

Staff points out that commodity gas costs, although recovered dollar for dollar, is a component of total revenue and total revenue is either a component or the "driver" for various test year estimates such as bad debt expense, late payment fees and storage costs. For instance, proposed test year bad debt expense is calculated as 0.96% of firm revenue; therefore, a 10% fluctuation (\$43.645 million) in commodity gas costs would impact bad debt expense by \$419,000.

The Commission has required companies during the proceedings, to provide updated BCOG information reflecting changes in commodity and demand costs.⁵

Thus, the Department recommends that Xcel Energy provide updated cost of gas information in this proceeding and in its companion general rate case. The Commission should require Xcel Energy to work with Commission and Department Staff to determine the appropriate timing for providing this information and whether the update(s) to the information should be applied to Xcel Energy's BCOG and reflected in the accompanying general rate case. The update(s) should be filed in both this docket and in the general rate case Docket 21-678. Additionally, when the Company files its final base cost of

³ See the Company's response to Department IR No. 5 included as Department Attachment 1.

⁴ The staff briefing papers are available in eDockets in Docket No. G008/MR-17-591, Document ID 20178-135004-01.

⁵ See for example, the Commission's *December 5, 2017 Order Setting New Base Cost of Gas for Interim Rate Period* in Docket No. G011/MR-17-564, *September 29, 2017 Order Setting New Base Cost of Gas* in Docket No. G008/MR-17-591, and *December 18, 2019 Order Setting New Base Cost of Gas* in Docket No. G008/MR-19-525, respectively.

gas pursuant to Minn. R. pt. 7825.2700, subp. 2, the cost of gas in that filing should equal the cost of gas approved for use in the general rate case.⁶

B. COMMODITY GAS COSTS

Xcel Energy estimated its commodity costs based on “a combination of market indicators such as [New York Mercantile Exchange] NYMEX and various long-term price forecasts published by highly respected, industry-leading sources such as Wood Mackenzie, IHS Markit and S&P Global. The forecast is NYMEX based for the first few years, and then it transitions into blending the NYMEX curve with the three vendor forecasts to develop a composite forecast.”⁷

The Department compared these estimated commodity cost rates to current NYMEX market expectations and concludes that, currently, the rate estimates are appropriate.

After estimating commodity costs for its customers, Xcel Energy calculated the estimated Weighted Average Cost of Gas (WACOG) for each customer class.⁸ Xcel Energy calculated its total gas cost recovery amount by multiplying monthly test-year sales amounts by the monthly projected WACOG price, resulting in a minor rounding difference.⁹ Xcel Energy expects total 2022 commodity costs to be \$253,473,987.¹⁰

C. TOTAL GAS COSTS

When Xcel Energy’s proposed demand gas costs (\$66,581,624) and commodity cost of gas (\$253,473,987) are added together, the resulting total gas costs are approximately \$320,055,612.¹¹ The Department notes that the Company’s response to IR No. 7 (included as Department Attachment 1) referenced where gas costs are included in its rate case filings. Based on the rate case exhibits and required filing, and the work papers noted earlier up above, the 2022 gas costs reported are \$320,055,405, resulting in a difference between the rate case and base cost of gas Petition of \$207. The Department concludes that the \$207 difference is attributable to rounding and is therefore acceptable.

⁶ Minn. R. pt. 7825.2700, subp. 2, states in part: “A new base gas cost must also be part of the rate design compliance filing submitted as a result of a general rate proceeding.”

⁷ See the Company’s response to Department IR No. 6 included as Department Attachment 1.

⁸ Petition Attachment A pages 1-2.

⁹ See Xcel Energy’s rate case filing in Docket 21-678, Direct Testimony of Michelle M. Terwilliger, Exhibit ____ (MMT-1), Schedule 5. The total commodity costs are approximately \$253,473,964 and in the Petition Attachment A they are approximately \$253,473,987 resulting in a difference of \$23.

¹⁰ Petition Attachment A pages 1-2.

¹¹ Petition Attachments A and B.

D. TARIFFS

Xcel Energy provided its proposed updated tariff sheets in both clean and redlined versions as Attachment D to the Petition. The Department reviewed the proposed tariff sheets and concludes that the proposed changes correctly update the base cost of gas values in accordance with the calculations contained in Attachments A through C of the Petition. As a result, both the clean and redlined versions of the tariff sheets are acceptable.

III. CONCLUSION AND RECOMMENDATIONS

Based on its review of the Company's Petition, the Department recommends that the Commission approve Xcel Energy's BCOG filing as modified herein with the following additional recommendations.

The Department recommends that the Commission require that Xcel Energy:

- provide updated cost of gas information in this proceeding and in its companion general rate case; and
- work with Commission and Department Staff to determine the appropriate timing for providing this information and whether the update(s) to the information should be applied to Xcel Energy's BCOG and reflected in the accompanying general rate case. The update(s) should be filed in both this docket and in the general rate case Docket 21-678.

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Xcel Energy Information Request No. 5
Docket No.: G002/MR-21-679
Response To: Minnesota Department of Commerce
Requestor: Sachin Shah
Date Received: November 3, 2021

Question:

What Demand Entitlement Petition did the Company reference and use in its calculation of the proposed system demand costs?

In addition, whenever acronyms are used in the data given in response to all the parts above, please provide an explanation of all acronyms used AND also provide a brief but complete explanation of the source of each data series that is provided.

If this information has already been provided in the application or in response to an earlier Department information request (IR), please identify the specific cite(s), eDocket ID(s), or Department IR number(s).

Response:

The Company began with the Demand Entitlements reported in our Supplemental Changes to Contract Demand (CD) Entitlements filed October 29, 2020 in Docket No. G002/M-20-633. We included updates for 2022 that were known at the time the Base Cost of Gas filing was put together. Differences between the Base Cost of Gas filed in the current docket, and Company's CD Entitlements filed July 30, 2021 and supplemented November 1, 2021 in Docket No. G002/M-21-589 are related to timing differences between the periods, contract expirations not yet renewed and future entitlements not yet included in the timeframe of a CD Entitlement filing. In addition, the CD Entitlement filing does not include balancing services or storage capacity reservation costs.

Preparer: Justin Holstein
Title: Manager
Department: Gas Resource Planning
Telephone: 303-571-2750
Date: November 5, 2021

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 Public Document – Not Public Data Has Been Excised
 Public Document

Xcel Energy Information Request No. 6
Docket No.: G002/MR-21-679
Response To: Minnesota Department of Commerce
Requestor: Sachin Shah
Date Received: November 3, 2021

Question:

For the proposed commodity gas costs please identify, and provide the specific prices indices, hubs, and publications, for example Wood Mackenzie, IHS Markit, S&P Global, NYMEX et cetera used by the Company in a Microsoft Excel executable format (*.xlsx) with all links and formulae intact. If any of these links target an outside file, please provide all such additional files.

In addition, whenever acronyms are used in the data given in response to all the parts above, please provide an explanation of all acronyms used AND also provide a brief but complete explanation of the source of each data series that is provided.

If this information has already been provided in the application or in response to an earlier Department information request (IR), please identify the specific cite(s), eDocket ID(s), or Department IR number(s).

Response:

The Company uses a combination of market indicators such as NYMEX and various long-term price forecasts published by highly respected, industry-leading sources such as Wood Mackenzie, IHS Markit and S&P Global. The forecast is NYMEX based for the first few years, and then it transitions into blending the NYMEX curve with the three vendor forecasts to develop a composite forecast. The Company used the following weightings for each component at various time intervals: Balance of the year plus two years is 100% NYMEX, years 3 and beyond is a simple average of NYMEX, Wood Mackenzie, IHS Markit and S&P Global.

The indices included in the proposed commodity gas costs are for the Chicago City Gate, NNG Ventura, NNG Demarc, Emerson, and ANR Oklahoma. Please see Attachment A to this response for the specific prices.

Attachment A to this response is considered trade secret information as defined under Minn. Stat. § 13.37. As such, this data is protected from public disclosure and has been marked accordingly. Xcel Energy makes extensive efforts to maintain the secrecy of this information. This information is not available outside the Company except to other parties involved in contracts and to regulatory agencies under the confidentiality provisions of state or federal law, as evidenced by the non-disclosure provisions in the contracts.

Preparer: Justin Holstein
Title: Manager
Department: Gas Resource Planning
Telephone: 303-571-2750
Date: November 5, 2021

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Docket No. G002/MR-21-679
DOC Information Request No. 6
Attachment A

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Docket No. G002/MR-21-679
DOC Information Request No. 6
Attachment A
Page 2 of 2

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Xcel Energy Information Request No. 7
Docket No.: G002/MR-21-0679
Response To: Minnesota Department of Commerce
Requestor: Sachin Shah
Date Received: November 3, 2021

Question:

Please identify how and where, the information from the BCOG Petition is used in the Company's corresponding general rate case AND please also provide the specific cite(s).

In addition, whenever acronyms are used in the data given in response to all the parts above, please provide an explanation of all acronyms used AND also provide a brief but complete explanation of the source of each data series that is provided.

If this information has already been provided in the application or in response to an earlier Department information request (IR), please identify the specific cite(s), eDocket ID(s), or Department IR number(s).

Response:

The information from the BCOG Petition is allocated to the Minnesota gas jurisdiction in the Cost of Service Study (COSS) in Docket No. G002/GR-21-678. This can be found in the following:

- Exhibit___(BCH-1), Schedule 3, Page 2, Lines 53
- Exhibit___(BCH-1), Schedule 4, Line 3
- Exhibit___(BCH-1), Schedule 8, Line 7
- Exhibit___(BCH-1), Schedule 11, Line 9
- Vol 3 II 4.A. Jurisdictional Statement of Operating Income, Page 1 and 2, Line 8;
- Vol 3 II 4.B. Ttl Utility and Juris Op Income Statement, Page 1 and 2, Lines 8;
- Vol 3 II 4.D. Operating Income Statement Adjustments_1, Page 1 and 2, Lines 9;
- Vol 4 II 2022 Test Year Cost of Service (COSS), Page 2
- Vol 4 V Base O&M O1-1 O&M by Functional Group, Page 1

- Vol 4 V Base O&M O1-2 O&M Labor Non-Labor, Page 1 and 3
- Vol 4 V Base O&M O1-3 O&M Jurisdictional Allocation, Page 1 and 3
- Vol 4 V Base O&M O2-1 Base Cost of Gas

The information from the BCOG Petition is included in the Class Cost of Service Study (CCOSS) in Docket No. G002/GR-21-678, in the following places:

- Vol 3 II 6.C 2022 CCOSS, Page 1, Line 22;
- Vol 3 II 6.C 2022 CCOSS, Page 5, Lines 18 and 19; and
- Exhibit____(CJB-1), Schedule 3, Lines 23-25.

The information from the BCOG Petition is allocated to revenues in the Rate Design in Docket No. G002/GR-21-678. This can be found in the following:

- Vol 3 II 6.A TY Operating Revenue Summary Comparison, Page 1, Present and Proposed Revenues (embedded)
- Vol 3 II 6.B TY Operating Revenue Detailed Comparison, Pages 2-5, Gas Supply Charge and Present and Proposed Revenue for each Customer Class
- Vol 2D 5 of 5 Terwilliger Rate Design, Exhibit____(MMT-1):
 - Table 1, Lines 10-18 (embedded),
 - Page 8, Lines 8-11,
 - Table 2, Lines 8-14, Avg-Bill Present Rates and Avg-Bill Proposed Rates (embedded),
 - Schedule 3, Lines 23-25,
 - Schedule 4, Present Revenue, CCOSS Responsibility, Increase without Design Change, and Proposed Revenues (embedded),
 - Schedule 5, Page 1 Present and Proposed Revenue (embedded),
 - Schedule 5, Pages 2-5, Gas Supply Charge and Present and Proposed Revenue by Customer Class,
 - Schedule 6, Proposed Cost of Gas (\$/Therm) and Total Commodity Rate (\$/Therm),
 - Schedule 7, Total Present Revenues (embedded),
 - Schedule 8, Pages 1-3, Present and Proposed Billing by Customer Class and Present and Proposed Rate Average Cost of Gas by Customer Class (embedded).

Preparer:	Chris Barthol	Michelle Terwilliger
Title:	Principal Pricing Analyst	Principal Rate Analyst
Department:	Regulatory	Regulatory

Telephone: 612-321-3237 612-330-5845

Preparer: Mary Pope
Title: Senior Rate Analyst
Department: Revenue Requirements
Telephone: 612-330-6574
Date: November 5, 2021

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Comments**

Docket No. G002/MR-21-679

Dated this 10th day of November 2021

/s/Sharon Ferguson

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