

October 3, 2024

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G002/M-24-271

Dear Mr. Seuffert:

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

In the Matter of Northern States Power Company, doing business as Xcel Energy's (Xcel or the Company) Petition for Approval of Changes in Contract Demand Entitlements.

The Petition was filed by Xcel on August 1, 2024.

The Department provides analysis on the calculation of the Design Day requirements. The Department will file additional comments on the other aspects of the Petition following the filing by Xcel of its November 1 update finalizing the Company's contracts. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ DR. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

MZ/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G002/M-24-271

I. INTRODUCTION

Pursuant to Minnesota Rules 7825.2910, subpart 2,¹ Northern States Power Company, doing business as Xcel Energy (NSP, Xcel, or the Company) filed a demand entitlement petition (*Petition*) on August 1, 2024, with the Minnesota Public Utilities Commission (Commission), to change the levels of demand for natural gas pipeline capacity for its customers.

II. BRIEF PROCEDURAL BACKGROUND

Xcel Energy filed a demand entitlement petition (*Petition*) on August 1, 2024, with the Commission.² The Company requested Commission approval to place the Purchased Gas Adjustment (PGA) changes into effect on November 1, 2024. The Company stated that, in the event that the Commission does not act by November 1, 2024, the Company, pursuant to Minn. Stat. § 216B.16, subd. 7, Minn. R. 7825.2920, and Xcel's PGA tariffs, will provisionally place the PGA changes into effect on November 1, 2024, subject to later Commission approval.³ This process is consistent with how past demand entitlement filings have been implemented.

The Department notes that as part of the demand entitlement process, Xcel will file a Supplemental filing of Update on or about November 1, 2024, showing the final demand entitlement volumes and cost that it proposes to charge to ratepayers.

In its *Petition*, Xcel requests approval from the Commission to implement its proposed interstate pipeline transportation, storage entitlement, and other demand-related contracts for 2024-2025 effective November 1, 2024. The Company requested that the adjustments be made through the PGA to reflect changes in its firm pipeline demand entitlement levels as follows:

- increase its Minnesota jurisdictional design-day (DD) requirement by 5,775 dekatherms per day (Dth/day), about 0.74% (5,775 Dth/778,606 Dth);
- change the capacity resources used to meet the design-day requirements and decrease the amount of capacity resources (total entitlements) for Minnesota by 7,978Dth/day or 0.97% (7,978 Dth/822,688 Dth);

¹ "Filing upon a change in demand. Gas utilities shall file for a change in demand to increase or decrease demand, to redistribute demand percentages among classes, or to exchange one form of demand for another."

² *Initial Filing-Petition Changes in Contract Demand Entitlements*, Docket No. G002/M-24-271 (August 1, 2024) (eDocket# [20248-209190-01](#)).

³ *Id.* at i-ii.

- a decrease in the reserve margin from 5.7% to 3.9% for Minnesota;
- slightly decrease the jurisdictional allocation to Minnesota (rather than North Dakota) to 86.42% from 86.80% to reflect customer growth and usage patterns; and,
- change its recovery of Supply Reservation fees.⁴

As noted above, the Company will submit a supplemental filing or update of its finalized proposed changes to its demand entitlement on or about November 1, 2024. The Department will provide a detailed analysis of those proposed changes at that time, including discussion on the following areas:

- proposed overall demand entitlement levels;
- reserve margins;
- supplier reservation fees;
- the PGA cost recovery proposals;
- Xcel's Storage; and
- Xcel's compliance with Ordering Paragraph 9 of the Commission's February 17, 2023 Order in Docket G999/CI-21-135.

At this time the Department provide its analysis of the Company's design-day forecast and requirements.

III. DEPARTMENT EVALUATION

A. XCEL'S PROPOSED DESIGN-DAY LEVELS

Xcel expects an increase of 5,438 customers between the 2023-2024 and 2024-2025 heating seasons in the Minnesota jurisdiction (from 487,929 to 493,367). The Company projected that this increase in customer base would increase the design-day requirements for Minnesota by 5,775 Dth.⁵

B. XCEL'S FORECAST

Consistent with its approach since its 2004-2005 demand-entitlement filing, the Company used two forecast methodologies in its estimate of its design-day requirement for the 2024-2025 heating season: the Actual Peak Use-per-Customer Design Day (UPC DD) and the Average Monthly Design Day (Avg. Monthly DD). The Department assesses the foundations of the methodologies below.⁶

1. Actual Peak Use-per-Customer Design Day (UPC DD)

The UPC DD method employs a use-per-customer number of 1.57393 Dth/day to estimate the design-day demand forecast, based on the actual use per customer on Thursday, January 29, 2004, which was

⁴ *Id.* at 2-4.

⁵ *Id.* at 3.

⁶ *Id.* t Attachment 1 at 2-5.

a day for which only firm customers were on the system.⁷ Xcel multiplied the 1.57393 Dth/day value by estimates of total firm customers in all of Xcel's service areas and added the contracted billing demand for Small and Large Demand Billed Customers to arrive at the total expected design-day demand for the Xcel system. Thus, unlike the Avg. Monthly DD method, the way customers are distributed among service areas does not affect the aggregate forecasts produced by the UPC DD method because the total number of customers and the resulting total volume is unchanged no matter where the customers are located.

Xcel's analysis using the UPC DD and the Avg. Monthly DD resulted in an equivalent total expected design-day demand for the Xcel system.⁸ If either cold temperatures or differences in results compared with the Avg. Monthly DD method indicate that the 1.57393 Dth/day peak-day use-per customer volume is out of date, the Company states that it will adjust the volume accordingly.⁹

2. Average Monthly Design Day

The Avg. Monthly DD method is a statistical method that uses linear regression analysis to estimate design-day demand. Xcel performs a separate regression on each demand area for both residential and commercial customers.¹⁰ These separate demand areas have their own specific usage characteristics based on the input data; as such, the coefficients used to estimate use per customer vary from service area to service area. Consequently, the shifting of customers among demand areas can affect the aggregate forecasts produced by the Avg. Monthly DD method. The Company's service areas were unchanged from the 2016-2017 heating season to the 2023-2024 heating season; therefore, any changes in the aggregate forecast numbers using the Avg. Monthly DD method are related to typical growth dynamics and data turnover (Xcel used the 60 most recent months of data in its analysis),¹¹ and to the usage characteristics of customers in a given demand area.

The Company summarized its output statistics for each of its demand areas in Attachment 1, Schedule 1 of its Petition. Of the R-squared values for its various statistical models, Xcel stated that nearly 90% are greater than 0.80, which suggests that a high level of the predictive quality of the model is included in the input data for the specified variables. The models that have R-squared values less than 0.80 are generally associated with models that have a smaller number of customers. This result is not surprising or concerning, because a smaller sample of customers will inherently increase data variability—changes in consumption by a single customer, or group of customers, will have a much greater impact on total consumption than in a larger estimation group.¹²

⁷ *Id.* at Attachment 1, Schedule 3, at 2.

⁸ *Id.* Schedule 3, at 1, and Attachment 1, Schedule 1 at 1-5.

⁹ *Id.* Attachment 1, at 3-4

¹⁰ Xcel has 15 separate demand areas. The demand areas that the Company conducts separate analyses on are as follows: Metro, Brainerd, Mainline, Mainline—Welcome, Willmar, Paynesville, VGT-Chisago, Watkins, Tomah, Red Wing, Grand Forks MN, Fargo MN, Grand Forks ND, Fargo ND, and WBI ND.

¹¹ *Initial Filing-Petition Changes in Contract Demand Entitlements*, Docket No. G002/M-24-271 (August 1, 2024) (eDocket# [20248-209190-01](#)), Attachment 1, at 3.

¹² *Id.* Attachment 1 Pages 3-4

The statistics presented by the Company in its Petition suggest that the Avg. Monthly DD method produces acceptable forecasts. In Docket No. G002/M-13-663 the Department noted that, while acceptable, the Avg. Monthly DD method might not represent the best option available for forecasting natural gas needs.¹³ The Department noted that there were potential issues related to the model, because it assumes natural gas consumption is constant at all temperatures; the Avg. Monthly DD estimates the average demand area consumption based on a given temperature, instead of for a peak day where consumption is likely to be above average. After conversations with the Company, it was concluded that using a regression model based on daily consumption data would be very difficult since it would require a forecast of daily interruptible load in order to isolate firm load.¹⁴ Further, Xcel's dual-method approach counteracts some of the issues inherent in the Avg. Monthly DD method as the Avg. Monthly DD method generally results in higher forecasted requirements than those produced using the UPC DD method.

Xcel noted that some of its models had autocorrelation present in the regression analysis. The presence of autocorrelation in a regression analysis implies that the errors are not independent of each other.¹⁵ This result would violate one of the basic assumptions in typical regression analysis which is that one normally assumes that the errors are all independent of one another. Hence, the presence of autocorrelation would affect the validity of the statistical tests that are typically applicable to regression analysis such as, for example, the coefficient of determination ("R-squared") test statistic, and the t-statistic. When forecasting with an ordinary least squares (OLS) regression model, absence of autocorrelation between the errors is very important. As recommended in the Company's previous demand entitlement filings, Xcel did check and correct its regression models for autocorrelation and the Department appreciates Xcel doing so.

Xcel also noted that in two regression models, WBI Residential and Grand Forks MN Small Commercial, the analysis resulted in negative intercept coefficients which would indicate negative usage at zero Heating Degree Days (HDDs). The Company stated the following:¹⁶

This would indicate negative gas use at 0 HDD, which is not realistically possible. To correct for this, we adjusted the heating degree day values to 0 for each summer month for the affected areas. This supports our base use of gas during the summer months, which is not temperature dependent, and is more reflective of reality. We then performed the regression analysis on the four areas, which resulted in positive intercept coefficients, though not statistically significantly different from zero.

The Department agrees with Xcel that negative usage at zero HDDs is impossible and appreciates Xcel's correction.

¹³ *Comments*, Docket No. G002/M-13-663 (August 30, 2013)(eDocket# [20138-89788-01](#)), at 5-6.

¹⁴ *Comments - Supplement*, Docket No. G002/M-13-663 (March 4, 2014)([20143-97061](#)), at 2.

¹⁵ *Initial Filing-Petition Changes in Contract Demand Entitlements*, Docket No. G002/M-24-271 (August 1, 2024) (eDocket# [20248-209190-01](#)) Attachment 1, at 3.

¹⁶ *Id.* Attachment 1, at 3.

The Department concludes that Xcel's forecast methodology is acceptable, and the Department agrees with Xcel that the Company should continue to use the two methods to develop its design-day estimate, updating the UPC DD method when appropriate.

C. *Xcel's Forecasts*

Xcel projected that its Minnesota and North Dakota design-day requirements will increase by 10,544 Dth/day to 907,592 Dth/day in the 2024-2025 heating season, or a 1.2% increase. The Company's forecast of its Minnesota design-day requirements is 784,382 Dth/day, an increase of 5,775 Dth/day, or an increase of 0.7%. In addition, the forecasted North Dakota usage for 2024-2025 is 123,210 Dth/day, an increase of 4,768 Dth/day, or a 4.0% increase from the 2023-2024 heating season.¹⁷

Xcel's customer forecast shows the number of Minnesota customers increasing by 5,434, from 488,079 in the 2022-2023 forecast to 493,513 in the 2024-2025 forecast, an increase of approximately 1.11%.¹⁸

The North Dakota customer count is forecasted to increase by approximately 2.69% to 65,391 in 2024-2025, up from 63,681 in 2023-2024.¹⁹

The Department notes that the bigger rate of increase in forecasted North Dakota gas consumption indicates that the proportion of design-day responsibility on the Xcel system shifted slightly to North Dakota from Minnesota, which is typical of the trend in the past several years.²⁰ According to the *Petition*, the consumption allocator for Minnesota for the 2024-2025 heating season is 86.42%, down from 86.80% during the 2023-2024 heating season.²¹

The Department recreated and confirmed the results of both of the Company's forecast methods. Based on the Department's analysis and the Company's descriptions of its forecasting techniques, the Department concludes that Xcel's forecasting of design-day levels were performed appropriately.

D. *JURISDICTIONAL ALLOCATIONS*

The 2024-2025 heating season jurisdictional allocation factor, which is used to allocate new peak capacity to Minnesota and North Dakota, remained within 0.50 percentage points of the projection for the prior heating season. The allocation factor is calculated by dividing the design-day forecasted demand for Minnesota (784,382 Dth/day) by the same demand for the Company's system (907,592

¹⁷ *Id.* Attachment 1, Schedule 3, at 1.

¹⁸ *Id.* Attachment 1, at 2.

¹⁹ *Id.* Attachment 1, Schedule 1, at 1

²⁰ The other exceptions were the Minnesota allocation increase from 87.51% to 87.57% for the 2019-2020 heating season (Docket No. G002/M-19-498) and increasing from 87.27% to 87.39% in the 2021-2022 heating season (Docket No. G002/M-21-589).

²¹ *Initial Filing-Petition Changes in Contract Demand Entitlements*, Docket No. G002/M-24-271 (August 1, 2024) (eDocket# [20248-209190-01](#)) Attachment 1, Schedule 5

Dth/day). The Avg. Monthly DD results are used to update the allocation factor, which decreased from 86.80% to 86.42%.²²

Small annual changes in the allocation factor are almost inevitable. A locational change of a handful of customers in one state or the other can change the total numbers upon which the allocation factor is based and therefore change the allocation between the states. Again, such changes are typically not significant. The Department concludes that Xcel's proposed jurisdictional allocation change is reasonable.

IV. RECOMMENDATIONS

The Department recommends that the Commission approve the Company's design day forecast and Jurisdictional Allocations. The Department will file additional comments after reviewing the Company's upcoming November 1, 2024 supplemental filing or update addressing the Company's proposed changes pipeline Entitlements.

²² *Id.* Attachment 1, at 13.

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/M-24-271

Dated this **3rd** day of **October 2024**

/s/Sharon Ferguson

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