



414 Nicollet Mall
Minneapolis, MN 55401

June 28, 2024

—Via Electronic Filing—

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

RE: INITIAL COMMENTS
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 these Initial Comments to supplement our Straw Proposal filed on May 31, 2024, in response to the Minnesota Public Utility Commission's Notice of Extended Comment Period regarding filing requirements for natural gas utility integrated resource plans, issued on May 7, 2024. During the June 18, 2024 Gas Utility Innovation Roundtable meeting, facilitated by Great Plains Institute, participating stakeholders requested that utilities provide an historical account of the number of projects at various investment thresholds for capacity expansion projects to be considered for an Expansion Alternatives Analysis (EAA).

Xcel Energy compiled the number of projects at an investment threshold of \$1 million or more. We have identified a total of six capacity expansion projects in the past five years, four of which are at or above our proposed threshold of \$3 million. While we believe an investment threshold at or above \$3 million, adjusted for inflation, captures our *significant* capacity expansion projects, there may be projects below this threshold that warrant consideration for an EAA. For instance:

- An EAA may be easier to execute for projects with a smaller number of directly impacted or served customers and could present cost-saving opportunities.
- Projects with a later in-service date within the action period might allow for a longer timeline to implement the proposed EAA solution.
- The project is in a disproportionately impacted community.

- Projects where delivering natural gas service is complicated by factors such as rough terrain, permitting challenges, or limited space.

As such, we propose the following redline modifications to our threshold decision option:¹

Proposed decision option: For Xcel Energy, the distribution system analysis shall include infrastructure costs related to resource expansion or new resources at or above a \$3 million threshold, adjusted for inflation. Additionally, Xcel Energy may evaluate and select projects for an Expansion Alternatives Analysis below this threshold where warranted. The resource plan shall include a discussion of the rationale for the projects selected for an Expansion Alternatives Analysis.

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

cc: Service List

¹ Xcel Energy, Straw Proposal at p. 6 and 10.

CERTIFICATE OF SERVICE

I, Christine Schwartz, 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 NOS. G008, G002, G011/CI-23-117

Dated this 29th day of June 2024

/s/

Christine Schwartz
Regulatory Administrator

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