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Minneapolis, MN 55401

August 1, 2025

—Via Electronic Filing—

Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: ANNUAL REPORT
FEBRUARY 2021 NATURAL GAS PRICE INVESTIGATION
DOCKET NOS. G999/CI-21-135 AND G002/CI-21-610

Dear Mr. Bull:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) this Annual Report in compliance with the Commission's February 17, 2023 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 in Docket Nos. G999/CI-21-135, G008/M-21-138, G004/M-21-235, G002/CI-21-610 and G011/CI-21-611.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service lists. Please contact me at lisa.r.peterson@xcelenergy.com or (612) 330-7681 or Paget Pengelly at paget.j.pengelly@xcelenergy.com or (612) 330-6892 if you have any questions regarding this filing.

Sincerely,

/s/

LISA PETERSON
DIRECTOR, REGULATORY PRICING AND ANALYSIS

Enclosure
cc: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	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

DOCKET NO. G999/CI-21-135

IN THE MATTER OF A PETITION OF
NORTHERN STATES POWER COMPANY
D/B/A XCEL ENERGY TO RECOVER
FEBRUARY 2021 NATURAL GAS COSTS

DOCKET NO. G002/CI-21-610

ANNUAL REPORT

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) this Annual Report in response to the Commission's February 17, 2023 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 (February 2023 Order) in Docket Nos. G999/CI-21-135, G008/M-21-138, G004/M-21-235, G002/CI-21-610 and G011/CI-21-611.

Order Point 15 states:

- 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.*

We provide details of our recent efforts below.

A. Interruptible Tariffs

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.*

Our proposed tariff changes in compliance with this order point were included in Company witness Scott S. Hults' Direct Testimony (pages 7-16) submitted on November 1, 2023, with Rebuttal Testimony submitted by Company witness Gerald E. Traut on May 29, 2024, in Docket No. G002/GR-23-413 (Gas Rate Case).

The Company proposed tariff language to ensure that all interruptible customers understand the potential for curtailment during extraordinary economic events. The Company also proposed to modify its existing Interruptible Service rate schedule by establishing two tiers of interruptible service:

- Tier I Interruptible customers shall be subject to curtailment whenever the Company determines that the supply or capacity of the natural gas system is at risk.
- Tier II Interruptible customers shall be subject to curtailment whenever the Company determines that the supply or capacity of the natural gas system is at risk and/or during economic events.

On June 26, 2024, a Comprehensive and Unanimous Settlement Agreement (Settlement Agreement) was filed in the Gas Rate Case. Beginning on page 19 of the Settlement Agreement, section H. Tariff Revisions, the parties agreed that the Company's tariffs should include the Company's proposed two tiers of Interruptible Service (Tier I and Tier II) with the rates set so that the Interruptible class revenue recovery is consistent with the Interruptible class revenue recovery absent the economic curtailment proposal.

The Commission approved the Settlement Agreement in its March 5, 2025, ORDER ACCEPTING AND ADOPTING AGREEMENT SETTING RATES. The new tariff was effective June 1, 2025.

B. Daily Spot Market Prices that Exceed 5x the Average Price for Current Month's PGA

3. *The utility shall notify the Commission of a pricing event within 3 days of the first day gas prices spike to five times the PGA cost. The notification shall be filed in e-dockets and include the date of the initial price spike and the impacted hubs.*

In addition, 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 following the last day of the price event 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.*

In its June 2, 2025 Order (June 2025 Order), the Commission modified the reporting requirements that include notification of a pricing event within 3 days of the first day of the pricing event and that the filing is to be made 14 days following the last day of the price event. The Company did not experience any events requiring notification pursuant to these requirements during the 2024-2025 gas year.

C. Contracting, Hedging, and Supply Options

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.*

The Company is continually exploring, evaluating, and pursuing supply options – including contracting, hedging, and physical storage – that may provide protection against extraordinary price spikes. Options discussed below include: fixed price contracts, physical storage, and financial hedging.

One option for price certainty is to fix the price of gas for a period. Long-term fixed price contracts (i.e., contracts of one year or more) provide price protection against the potential for higher seasonal winter prices and daily price spikes. However, this price guarantee requires customers to forego market price declines if actual gas prices in the heating season end up being below the earlier forecasted price at which the contract price was set. It is typical for actual prices to be higher or lower than earlier forecasts, and sometimes, substantially different. If actual prices do fall below the

contracted price, it may be considered retrospectively as a gas cost “loss.” For example, assume we were to purchase a one-year baseload package of 50,000 Dth per day at \$4/Dth fixed price, for a total cost of \$73 million annually. If the average First of Month (FOM) Index prices for the year settle just one dollar lower than the fixed price transaction, the total annual costs to customers would be \$18.25 million more than they otherwise would have been at the FOM index price. The prudence and cost recovery of fixed price contracts would need to be assessed based on the facts at the time the contract is entered into, and not after-the-fact based on whether the contract was above or below actual gas prices. Additionally, this solution is typically for baseload type purchases, and thus is not generally a substitute for protection against price spikes in daily priced gas.

Physical underground storage is the best hedge against daily price spikes. The Company holds storage to address approximately 27 percent of its winter design day requirements, which provides important reliability and price protection measures. In addition to providing price certainty, storage provides a critical role in assuring physical supply when needed and balancing system operations every day to provide continuous service. An analysis of our storage withdrawal strategy is discussed later.

The Company is actively exploring options to expand its storage portfolio. On April 21, 2025, WBI posted a notice of binding open season for its Baker Storage Enhancement Project. The project is proposed to create up to 72,000 Dth/day of additional withdrawal capacity from WBI’s storage field, with 1.0 bcf in associated storage capacity for service estimated to begin in 2029. In evaluating the proposal, NSP determined that the new storage service would provide reliable gas supplies throughout the winter heating season at a known price, increasing our quantity of gas supplies from storage on a design day, and provide additional protection against extreme price spikes like those seen during Winter Storm Uri. NSP currently holds firm transportation on WBI’s integrated pipeline system, which could provide transportation service from the project to our customers. NSP submitted a bid into this open season offering on May 20, 2025. WBI is currently evaluating bids.

Finally, the Company employs financial hedges against monthly natural gas commodity price volatility to protect customers from high market prices for baseload gas. These hedges are designed to provide protection against longer-term trends in rising gas prices rather than spikes in the daily market. This hedging activity is annually reviewed and approved by the Commission. The currently approved hedging plan limits the Company to hedging no more than 50 percent of our annual expected winter requirements (through either physical storage or financial hedging), and no more than 25 percent of our annual expected winter requirements can be hedged with financial instruments. The 50 percent level has been determined to be a prudent target

level when balancing costs and benefits of financial hedging programs. These financial instruments have proven to be quite costly in the past and, in many years, there is not enough gas price market volatility to make them beneficial.

In its Petition for an extension of rule variances to recover the costs of financial instruments through the purchased gas adjustment clause (PGA) in Docket No. G002/M-23-521, the Company proposed to pilot several new or different tools for hedging. These included the incorporation of physical fixed price deals and a new financial product of gas daily (GD) swap agreements. The incorporation of these tools into our hedge plan provided additional measures to mitigate the impact of an extreme price spike. The Company continues to explore financial hedging (such as the GD swap agreements), or other solutions that would provide protection from daily price spikes. However, hedge products for this type of supply are limited as suppliers do not want to take on the added risk of significant quantities under these type of supply arrangements. The Company continues to survey the market for financial hedging products that would protect against daily price swings. However, while the Company may test some newer financial products, these products are not offered by the market at price levels or at quantity levels that would significantly offset cost risk.

D. Baseload Purchases

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

The foundational elements of our gas supply planning and procurement are baseload packages of gas we commit to take each day of a month regardless of customer load. Baseload packages are typically purchased prior to the beginning of the heating season or at the end of the previous month for the upcoming month and are priced at a FOM Index price. Baseload agreements have no flexibility to match daily load with supply. The contracted quantity must be taken regardless of whether it is an unusually warm day or an unusually cold day. The purchaser must accept delivery of the daily contract quantity every day, even if baseload purchases exceed actual load. In addition, baseload purchases are generally locked in at the FOM Index price, which may be higher or lower than the daily spot price.

The baseload quantity determination each month is based on several factors. First, we review forecasted sales and average weather. Second, we consider previous years' actual loads for each month and the forecasted weather for the upcoming month. Finally, we consider current storage inventory levels, mandated inventory levels at the end of the winter season, and the associated storage deliverability limits and/or requirements. Storage factors are crucial to baseload decisions, as any gas purchased

that is not used on a day is typically an offset to storage withdrawals to be used later. The goal is to purchase enough seasonal and monthly baseload, accounting for storage limits and withdrawals, to serve the minimum customer needs every day for that month. Baseload purchases made for the 2024-2025 heating season are summarized in Table 1 by term and monthly contracts.

Table 1
Term and Monthly Baseload Purchases
2024-2025 Heating Season

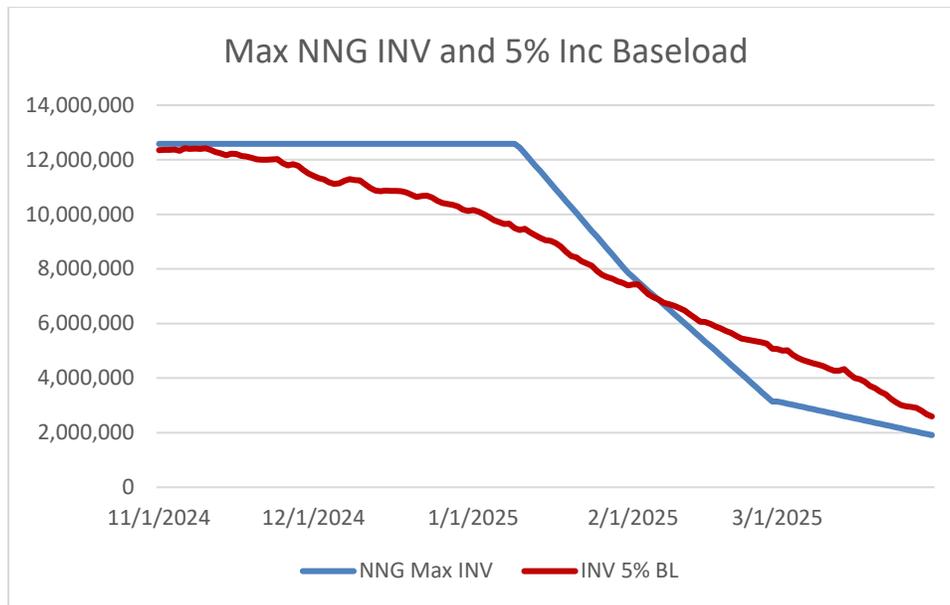
	Term			Monthly (Dth/day)	Total (Dth/day)
	3-Month (Dec-Feb) (Dth/day)	5-Month Winter (Nov-Mar) (Dth/day)	12-Month (Nov-Oct) (Dth/day)		
11/1/2024		151,700	2,000	25,000	178,700
12/1/2024	15,000	151,700	2,000	65,000	233,700
1/1/2025	15,000	151,700	2,000	80,000	248,700
2/1/2025	15,000	151,700	2,000	30,000	198,700
3/1/2025		151,700	2,000	10,000	163,700

Following the extraordinary price spikes of Winter Storm Uri, the Company reviewed its levels of baseload gas and increased term and monthly baseload purchases during the winter of 2021-2022 by 12 percent (or an additional 30,000 Dth/day). Similar volumes were also purchased for subsequent winters.

In addition, the Company updated a study of its baseload supplies to determine if more could be added to the portfolio, further reducing purchases exposed to the daily price market. The study tested increased baseload volumes by between 5 and 30 percent over the baseload volumes purchased for the winter of 2024-2025. These increased volumes were then compared to historical daily load. On days where purchases were higher than system load, excess gas volumes were assumed to be injected into storage. On days where load exceeded purchases, the difference was assumed to come from storage withdrawals. In each instance where baseload gas was increased, our projected storage inventory on Northern Natural Gas (NNG) (our largest, most flexible storage provider) went above the total storage capacity plan starting in February. Our storage plan is produced prior to each heating season as a guide for storage balances to maintain compliance with NNG storage contract and tariff limits. A storage inventory above the storage plan exposes the Company to financial penalties for being out of compliance with contract limits. Graphs of the lowest scenario are shown below as Figures 1 and 2. The study shows that additional

baseload above current levels poses risks to the Company meeting contractual limits for storage, limits flexibility for storage use late in the heating season, and is a risk for increased penalties. These results are in line with previous analyses showing increases in baseload purchases expose the Company to breaching the total NNG storage capacity.

Figure 1
2024-2025 Base Year



Recent operational experience from the winter of 2024-2025 provides more evidence that weather variability renders term baseload contracting levels difficult to predict. The early part of this past winter was warmer than average, which reduced overall demand. As the winter progressed, storage inventory levels remained higher than planned, threatening to exceed our contract limits by the end of the winter. The Company adjusted its supply plans and was able to meet contract requirements by managing purchases. However, this significantly reduced flexibility to optimize gas supply for our customers.

Overall, the current level of baseload is at the upper limit for the Company to manage loads and storage inventories. It is important to note that depending on forecasts and storage levels, the monthly baseload levels may be adjusted from past levels. Buying more baseload gas than base customer needs would lead to operational concerns and issues that, over the long-term, outweigh any potential benefit of buying additional baseload gas.

E. Storage Inventory Management

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

The February 2023 Order (page 14) encouraged Minnesota utilities to explore options for utilizing their storage assets to maximize late season access to stored gas supplies. The Company agrees that it is important to preserve storage inventory and withdrawal capability until late in the winter heating season as significant cold weather can occur in Minnesota in late February. As the following discussion will demonstrate, the Company manages its assets to preserve storage capability through February.

The Company meets a large portion of its gas supply needs through storage services on three major interstate pipeline/storage companies. Currently, the Company holds 14.7 Bcf, or approximately 26 percent of our firm winter requirements, and 27 percent of a design day, of storage capacity with up to 242,800 Dth/day of daily deliverability (withdrawal) capacity. The storage capacity is primarily used for operational purposes to provide reliable supply during high demand seasons and for day-to-day balancing of loads. However, the storage capacity also provides pricing protection during gas price upsets.

Underground storage fields each have unique operating requirements. Generally, they require an annual rest period (no or limited injection/withdrawal activity) over the summer to preserve injection and withdrawal capabilities. To oversimplify matters, most storage fields can withstand high operating pressures for a short period of time in the winter. High pressure is driven by the amount of inventory in the storage field at any given time (picture a balloon that expands and contracts as air is inserted or removed). If the field remains at high pressure for too long it may squish the stored gas out of the reservoir where it will become unusable. Or, in worse cases, it may damage the field making it unable to perform at designed levels. For these reasons, most storage services require shippers (like the Company) to empty or nearly empty their storage accounts at the end of each winter. The storage service, in many cases, also carries inventory targets where the shipper is required to fall below certain inventory levels at stated times during the winter (often referred to as a “ratchet,” since quantities are being tightened down over the winter).

By far, the largest portion of the Company’s storage is 12.5 Bcf of storage capacity and a maximum of 218,820 Dth of withdrawal capacity on NNG from fields located in Iowa and Kansas, which is directly connected to many of our service areas. NNG’s firm storage services are currently fully subscribed. We also hold storage capacity on ANR-Pipeline and ANR-Storage. Those storage fields are located in Michigan, and

through connecting pipelines provide supply flexibility and price protection to Viking connected systems, and the north end of NNG connected systems through Great Lakes Gas Transmission Company.

a. Storage Service Options

Required the Natural Gas Utilities to evaluate the storage service options provided by the interstate pipelines that serve them to determine which storage service option is most appropriate for their situation.

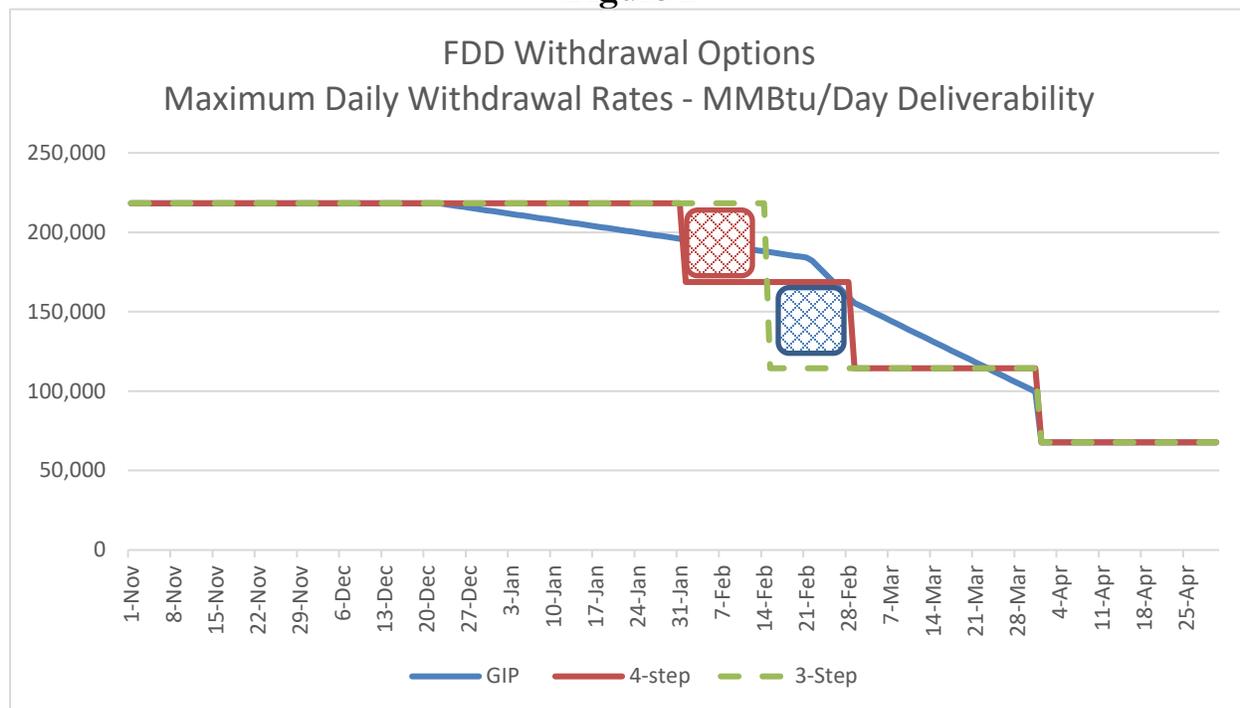
Ninety percent of the Company's contracted storage withdrawal service is provided by NNG. NNG offers three storage options to its LDC customers: i) Gas-In-Place option (GIP); ii) 3-Step option; and iii) 4-Step option. The annual costs for each option are the same; however, the options provide varying methods of determining withdrawal quantities during the heating season. Withdrawal capability under the GIP option is determined as a formula dependent on the customer's current storage inventory. The 3-Step option has a fixed withdrawal quantity for each month as a percentage of total storage capacity under the contract, which changes three times per heating season on November 1, February 15, and April 1. The 4-Step option is similar to the 3-step with changes on November 1, February 1, March 1, and April 1. All options are subject to periodic minimum inventory requirements on January 31, and maximum inventory requirements on March 1 and May 1.

NSPM takes service under the 4-Step option because, as a utility concerned with system reliability, NSPM prefers a fixed withdrawal deliverability throughout the winter rather than having withdrawal deliverability constrained by storage inventory. Using this method, NSPM can be assured of a fixed amount of withdrawal capacity in February rather than having fluctuating quantities that could change during the middle of a significant cold weather event (GIP), or a mid-February change which would make it more difficult to plan monthly baseload (3-Step).

Figure 2 below shows the maximum daily withdrawal rates under each of the three options during the winter season November 1 through April 30. Both the 4-Step and 3-Step options guarantee fixed withdrawal deliverability; however, the 4-Step option gives NSPM higher gas withdrawal capability later in the winter (i.e. February). This is represented in the blue shaded area below. The trade-off is less withdrawal capability during the first half of February when compared to the 3-Step option, represented by the orange shaded area. NSPM believes this trade-off provides for greater system reliability through consistent, reliable available quantities. According to a separate study of baseload purchases discussed above, even slight increases to monthly, fixed baseload gas supplies displaces early season storage withdrawals, preserving inventory

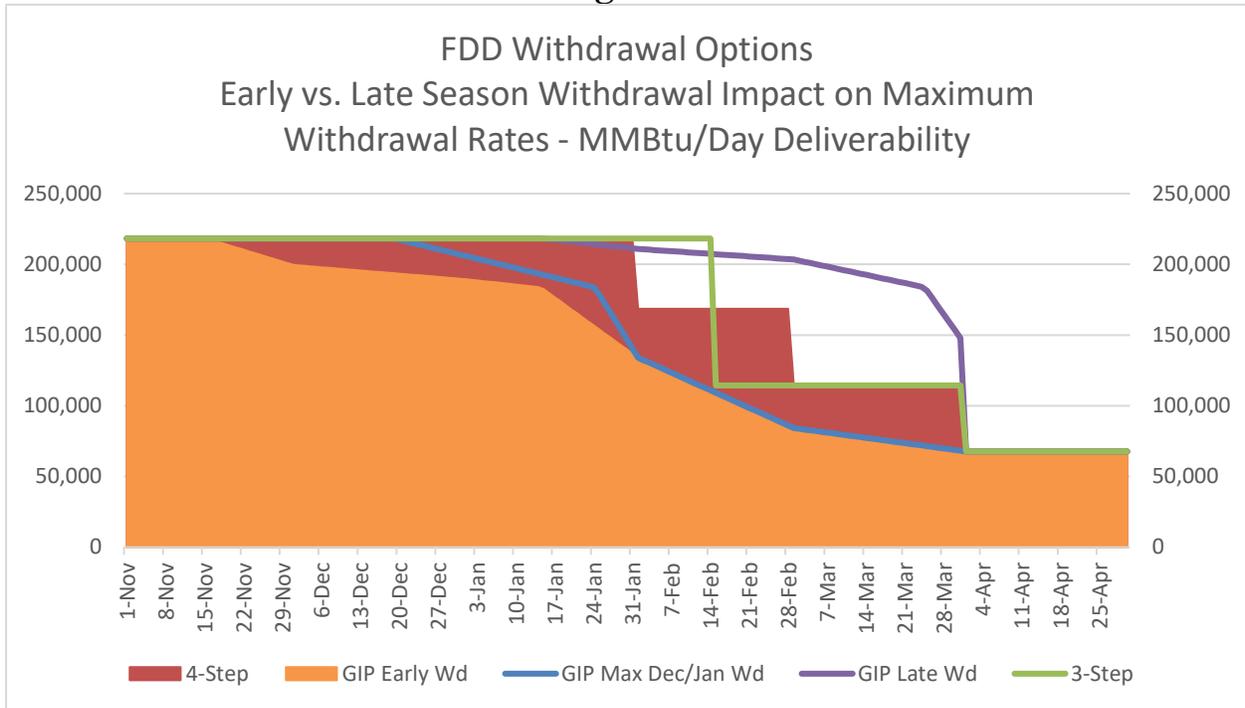
to late February, and shifting significant withdrawals toward late February (see Figures 1 and 2). This highlights the need for a higher withdrawal capacity during late February to maximize the flexibility of our storage inventory and remain within the contractual limits of the service.

Figure 2



As mentioned above, the Company believes its customers are better served by a fixed withdrawal deliverability during each winter month that doesn't fluctuate with its storage inventory level. Figure 3 illustrates the trade-off between the inventory-based GIP option and the 4-Step option during an unexpected early season cold spell. In the event of a colder than expected early winter, the Company would withdraw larger quantities to serve unexpected early winter demand. The resulting late season withdrawal capability would then be far less under the GIP option as opposed to the 4-Step option. In Figure 3, the orange area represents the withdrawal capability of the GIP option after early winter season withdrawals. In contrast, the brown area is the withdrawal capability still available under the 4-Step option in the same scenario. The preserved withdrawal capacity under the 4-Step option is essential for the Company's system reliability to meet demand requirements after unexpected weather and drawdowns in storage inventory. Also note the continued difference in late February withdrawal capacity between the 3-Step and 4-Step options, as discussed above. As a result, the 4-Step storage option is the preferred option for the Company.

Figure 3



As mentioned above, the February 2023 Order encourages Minnesota utilities to explore options for utilizing their storage assets to maximize late season access to stored gas supplies. The Company provides for late system winter storage flexibility by using a storage service that maximizes the option for late February storage service.

F. Supply Reserve Margin Practices

- 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.*

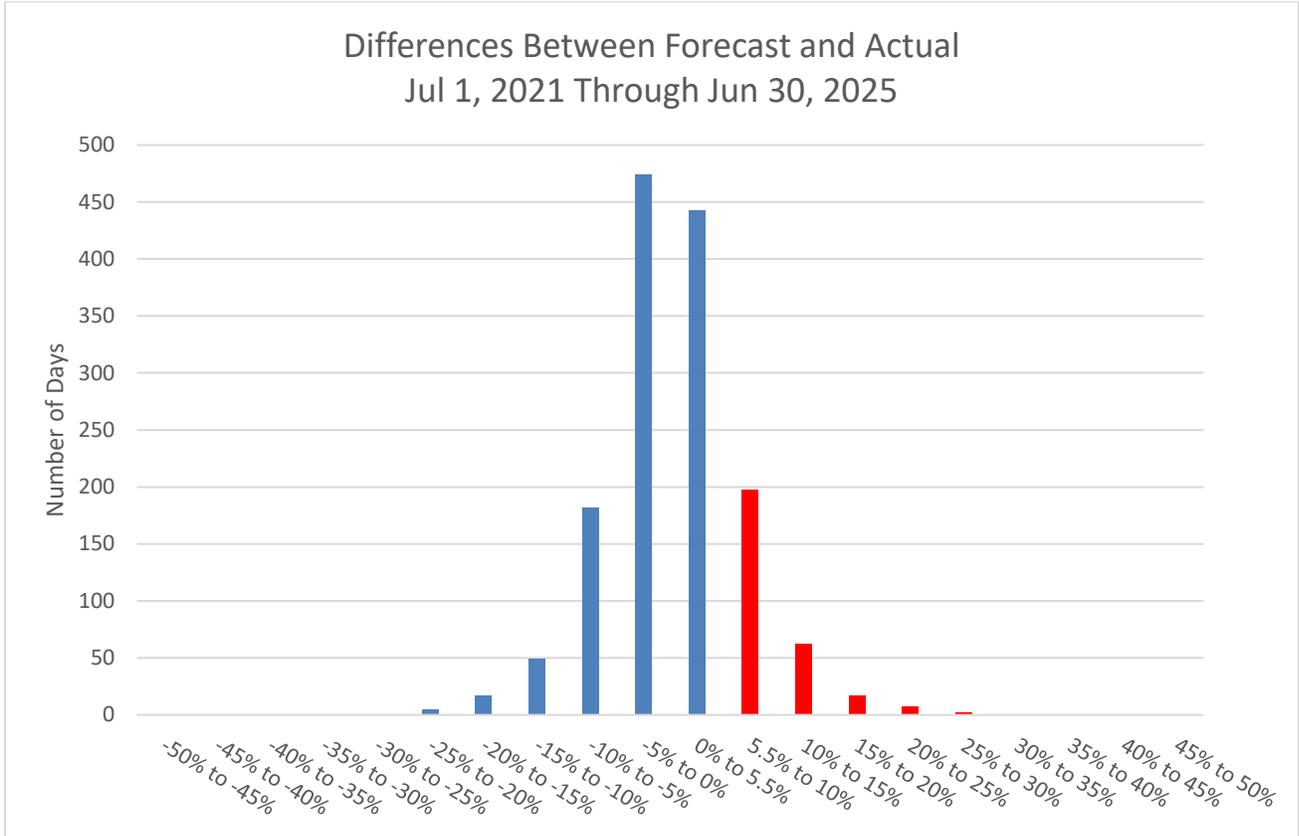
In planning daily gas supplies to serve customers, the Company always plans to have a supply reserve (or safety margin) available each day. The reserve margin is our back-up plan in case, among other things, temperatures are colder than expected, there are interstate pipeline outages, or there are supply failures. A reserve margin provides the Company and our customers a variety of other protections. First, it protects the Company and our customers from pipeline penalties if we burn more gas than we delivered to the pipeline that day. Second, it protects us from potential pipeline capacity issues by providing backup or alternative supply options on our pipelines in case one of the pipelines experiences a daily facility outage restricting capacity in part of the delivery network. Third, it protects us from possible supply failures, such as a

producer experiencing a force majeure event and not delivering promised supply to us.

Reasonable reserve margins vary depending on the weather and load forecast, time of year, storage inventories, potential for supply failures, interstate pipeline operating conditions, local distribution company (LDC) conditions, the likelihood of colder than predicted temperatures, whether upstream pipelines have declared balancing penalties, and the market availability of additional gas supply. For example, the quantity required as reserve for a warm summer day is significantly different from that reasonable for a cold winter day. Reserve supply purchases may also be informed by the length and extent of the predicated cold weather, since it is often beneficial to acquire extra gas supply at the beginning of an extended cold weather event.

One factor impacting gas supply reserve margin is the accuracy with which customer demand can be predicted. Figure 4 below compares the differences between forecasted and actual loads for the four-year period between July 2021 and June 2025. The chart shows the number of daily occurrences where the difference between forecast and actual load is sorted into defined categories (0 to 5.5 percent, 5.5 to 10 percent, and so on). The five bars on the left are denoted as negative, meaning that the actual load was less than the forecasted load creating no reliability concerns as there would have been more supply than demand. The six bars on the right (one blue and five red) are denoted as positive meaning that the actual load was greater than the forecasted load creating reliability concerns if there was no supply reserve acquired. Overall, the forecasting variance averages 0.36 percent, indicating a useful forecasting tool. However, the range includes up to 28 percent miss to actual loads, which identifies a specific need for a supply reserve to protect customer's reliable service.

Figure 4
Demand Forecast to Actual



The variability in this chart underscores the importance of evaluating current conditions each day (weather, risk of supply failures, market conditions, operating conditions, etc.) to select the appropriate supply reserve for that day. Applying a rigid reserve margin could risk reliability on some days. The Company endeavors to continuously monitor, evaluate, and improve the accuracy of its forecasts as a critical factor in providing a reasonable gas supply reserve margin.

G. Forecasting & Curtailments

- 6. *The Gas Utilities must include in future August compliance filings a report on how they are improving incorporation of curtailment calls into their gas supply planning processes for both reliability and economic purposes*

In its June 2, 2025 ORDER APPROVING FILINGS AND REQUIRING NOTIFICATION OF PRICING EVENT in the instant dockets (June 2025 Order), the Commission directed Utilities to include a report on how we are improving incorporation of curtailment calls into our gas planning processes. As noted above, the Company continuously

strives to improve our forecasting, including by accounting for anticipated reductions of gas use by interruptible customers during curtailment events. However, several challenges exist including the timing of curtailments, customer compliance, and forecasting customers' dynamic uses. First, as to timing, the Company purchases gas each morning for delivery to our customers on the following day. If curtailment events are called after gas purchases are made, relief from that event cannot be incorporated into purchases after the fact. The Company has worked to coordinate internal processes such that curtailments can be implemented to meet these timings as best as possible; however, events may arise that require more immediate action. Second, as discussed in more detail below, the Company continuously works to improve customer compliance with calls for curtailment. Finally, the Company has to contend with the natural uncertainty of two forecasts – system and interruptible customers. This natural uncertainty, and the Company's commitment to provide reliable service, prevents requires the Company to exercise its judgement based on knowledge and experience. If curtailments are called in advance of gas purchases, the Company utilizes its knowledge and experience to incorporate expected levels relief to adjust our purchases appropriately while maintaining sufficient reserves to manage the supply risks discussed in the previous section and maintain reliability.

H. Interruptible Customer Performance

7. The Gas Utilities must report, in future August compliance filings, on how they are improving interruptible customer compliance with curtailment orders.

In the June 2025 Order, the Commission directed Utilities to include a report on how we are improving customer compliance with curtailment calls. The Company continuously works to improve customer compliance with calls for curtailment. We note that compliance by customers can be impacted by many factors, including needing the customer's employees to reach locations to switch to alternate fuels, issues with backup equipment, etc. The Company believes customers make best efforts to fully comply with calls for curtailment, and the Company uses strong economic penalties to incent compliance. The Company hosts annual meetings with interruptible customers to explain the terms of service and emphasize obligations, among other discussion topics. The Company requires each interruptible customer to attest that they have the backup fuel systems required by our tariff for participation in the program, requires multiple forms of contact for notices of interruption, and tests these each year in anticipation of the heating season. Finally, the Company imposes penalties of \$5 per therm for first violation, and \$10 per therm for each violation after that. These penalties serve as economic incentives for customers to meet their obligation to interrupt when called to do so. For the 2024-2025 heating season, the Company collected approximately \$653,000 in penalties.

I. Pipeline Capacity

- 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.*

The Company discusses the geographic diversity of its access to supply in Attachment 1 of its Contract Demand Entitlements filing which is filed concurrently with this report. A detailed discussion can be found there.

J. Supply Mix Across Different Load and Weather Conditions

- 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.*

In preparation for the upcoming 2025-2026 heating season, the Company provides in Table 2 below ranges of daily load estimates. The estimates are based on five-years of actual load and weather data for each month. We also provide an illustrative supply mix for the time period. This supply and storage mix is unlikely to follow the chart exactly as weather and market conditions change supply will have to be adjusted to manage baseload supply, storage inventories and system reliability. These changes will likely occur on a monthly and daily basis as conditions warrant changes. For example, on days where there are price spikes the Company will make every effort to maximize its storage withdrawal capabilities while maintaining operational flexibility.

Table 2
Daily Load Estimate & Supply Mix
2024-2025 Heating Season

Minimum Load	November	December	January	February	March
5 Year Load	142,151	293,236	331,217	288,896	212,681
Baseload	100%	80%	72%	71%	86%
Estimated Storage	0%	20%	28%	29%	14%
Delivered Peaking	0%	0%	0%	0%	0%
Estimated Spot	0%	0%	0%	0%	0%
Total Est Supply	183,700	293,236	331,217	288,896	212,681
Average Load	November	December	January	February	March
5 Year Load	367,127	474,075	531,882	519,841	378,092
Baseload	50%	49%	45%	39%	49%
Estimated Storage	8%	18%	31%	27%	11%
Delivered Peaking	0%	0%	0%	0%	0%
Estimated Spot	42%	33%	24%	34%	40%
Total Est Supply	367,127	474,075	531,882	519,841	378,092
Max Load	November	December	January	February	March
5 Year Load	620,346	782,293	759,559	805,192	649,805
Baseload	30%	35%	36%	30%	28%
Estimated Storage	39%	36%	36%	29%	20%
Delivered Peaking	3%	3%	3%	3%	3%
Estimated Spot	28%	26%	25%	38%	49%
Total Est Supply	620,346	668,771	668,771	668,771	649,805

K. Plans that Study Customer Responses to Conservation Calls

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

The Company attached to is 2023 Annual Report the Colorado Conservation Messaging research report, which provided learnings on conservation messaging conducted in Colorado. The Company is in the process of planning research in Minnesota that builds on the Colorado research and findings, to increase our understanding of customer responses to conservation calls. The plan is to conduct a study specific to customers receiving natural gas service from the Company in Minnesota. The Company is working to finalize the scope of the project, including primary research (e.g. surveys, focus groups, interviews, etc.) and updated secondary research building on the Colorado report.

L. 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.

In evaluating the dispatch of our peak-shaving plants the Company considers several factors, including the immediate weather and load forecasts, our interstate pipeline capacity, interruptible customer load and potential curtailments, peak-shaving inventory, the overall heating season, and time of year. For example, if forecasted load exceeds the Company's interstate pipeline capacity, and interruptible customers are curtailed, the Company will evaluate whether to deploy peak-shaving inventory to meet customer needs. The Company will continue to use the immediate event circumstances, conditions of the current heating season, and fuel inventory to inform peak-shaving dispatch decisions. In addition, as described below, the Company will evaluate circumstances to use peak-shaving capacity in order to provide price mitigation for our customers during extreme pricing events.

M. Dynamic Proposals for Calling on Peaking Resources

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.

In its February 2023 Order, the Commission directed the Company to evaluate a dynamic proposal to peak shaving for price mitigation. Peak shaving has historically been designed, and used in this market, as a reliability tool for the distribution system that supplements the system in the event of near design day conditions or in response to unexpected reliability issues. That is, from a gas supply planning perspective, our peak-shaving plants are a capacity resource, to be called on in near design day conditions or to address emergent reliability issues. The peak-shaving plants are not a primary supply resource or a supplement to our normal supply portfolio as they lack the inventory to perform that function. Additionally, while it may be unlikely that design day conditions present late in the season, it is not impossible. For this reason, the Company must manage its peak-shaving plant inventory levels so that they are not depleted prematurely in the heating season.

The Company agrees that *so long as* the asset's original purpose is still met (in this case, reliability to our customers during the coldest days our system is expected to experience), the asset can be used in additional ways. To that end, the Company will continue to evaluate economic dispatch of its Wescott peaking plant during extreme price events during the 2025-2026 heating season, when certain conditions are met.

The Company expects to use LNG stored in its Wescott facility in situations where the price of gas reaches extraordinary levels, like they did during Winter Storm Uri. During the previous heating season, the Company did dispatch Wescott during the Martin Luther King Jr. Day weekend, the President's Day holiday, and eight other days, while maintaining sufficient inventory to meet design day and operational requirements. Over the holiday weekends, the Company withdrew LNG gas from Wescott on various days to support high customer demand and provide some customer price protection, although prices never reached levels requiring notifications to the Commission. The Company proposes to operate Wescott within the sole discretion of the Company when certain conditions are present.

The Company will, first and foremost, maintain inventory levels that support the system during a design day event or other operational needs. Timing of any potential price mitigation event will be a key factor in the decision to dispatch the plant for price mitigation purposes. Wescott has limited ability to liquify, or make, LNG. As a result, inventory in the tank will be reserved to ensure sufficient quantities for a design day, reliability event like an interstate pipeline failure (as in 2014 with TransCanada), system operational requirements, and the probability of other needs later in the winter. As we move through the winter season, the probabilities of such events change and may free more inventory for price mitigation.

Second, the Company expects that Interruptible customers will be curtailed during a dispatch for price mitigation. Peaking plants are a capacity resource. As the Company nears its distribution system demand capacity, Interruptible customers are called on to curtail so that the full capacity of the peaking plants and distribution system may be used to serve Firm customers' peak needs.

Finally, the Company will evaluate the status of the gas markets when deciding to dispatch for economics. Significant events that may warrant the dispatch of LNG for economic purposes could be but are not limited to significant freeze-offs or supply disruption, expectation of significant price lift, or extended trading windows. The Company will evaluate all of these factors on a dynamic basis when making a decision of whether to dispatch LNG for price mitigation.

CONCLUSION

We appreciate the opportunity to provide this information to the Commission.

Dated: August 1, 2025

Northern States Power Company

CERTIFICATE OF SERVICE

I, Joshua DePauw, 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. G999/CI-21-135
 G002/CI-21-610**

Dated this 1st day of August 2025

/s/

Joshua DePauw
Regulatory Administrator

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