

Direct Testimony and Schedules  
Gerold E. Traut

Before the Minnesota Public Utilities Commission  
State of Minnesota

In the Matter of the Application of Northern States Power Company  
for Authority to Increase Rates for Natural Gas Service in Minnesota

Docket No. G002/GR-25-356  
Exhibit\_\_\_\_(GET-1)

**Gas Service Policy and Extensions**

October 31, 2025

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## I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND OCCUPATION.

A. My name is Gerold E. Traut. I am the Manager of Gas Business Development for Northern States Power Company–Minnesota (NSPM or the Company), d/b/a Xcel Energy.

Q. PLEASE SUMMARIZE YOUR QUALIFICATIONS AND EXPERIENCE.

A. I have been in my current role as the Manager of Gas Business Development since 2024. I am responsible for the Minnesota and North Dakota gas business development group within NSPM Community Relations. My current responsibilities include developing and implementing new growth policies, investment analysis and approval processes for new customers, and general oversight and budgeting related to new gas business investments. In addition, I support large gas customer services in Account Management including interruptible, large firm, and large transportation customer offerings. Prior to 2024, I served for 10 years as Account Executive, Builder Developer Representative for the Gas Business Development Team. My statement of qualifications is included as Exhibit\_\_\_\_(GET-1), Schedule 1.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of my Direct Testimony is to discuss several compliance requirements related to the Company's gas service extension policies arising from various proceedings before the Minnesota Public Utilities Commission (Commission). Prior to addressing these compliance requirements, I provide a brief background related to gas service extensions and main extensions. In addition, Section IV of my testimony discusses proposed minor updates to the following tariff sheets:

- Underground Gas and/or Electric Distribution Agreement, Sheet Nos. 7-31, 7-32, and 7-33; and
- Natural Gas Service Agreement – Commercial and Industrial Service, Sheet No. 7-7.1

Q. HOW IS THE REMAINDER OF YOUR TESTIMONY ORGANIZED?

A. The remainder of my testimony is organized as follows:

- *Section II: Background on Gas Service and Main Extensions*
- *Section III: Compliance Requirements*
- *Section IV: Proposed Tariff Revisions*
- *Section V: Conclusion*

## II. BACKGROUND ON GAS SERVICE AND MAIN EXTENSIONS

Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?

A. As many of the compliance items I discuss below relate to gas service extensions, in this section of my testimony, I will provide brief background information regarding these types of extensions.

Q. WHAT ARE GAS SERVICE EXTENSIONS?

A. Gas service extensions are main and service additions that extend the Company's natural gas infrastructure to new customers that have requested service. A gas main is a pipe that serves more than one customer, while a gas service extension typically connects to the gas main and goes directly to a gas meter. The gas meter is the terminus of the Company's gas utility facilities and the point at which customer piping begins.

1 Q. WHEN ARE GAS SERVICE EXTENSIONS NECESSARY?

2 A. Gas service extensions are necessary whenever the Company's current  
3 infrastructure is not adequate to serve the natural gas requirements of a new or  
4 existing natural gas customer.  
5

6 Q. HOW DOES THE COMPANY DETERMINE WHETHER OR NOT A CUSTOMER IS  
7 REQUIRED TO PAY A CONTRIBUTION IN AID OF CONSTRUCTION (CIAC)  
8 RELATED TO THE CONSTRUCTION OF A GAS MAIN OR SERVICE EXTENSION?

9 A. This process is set forth in greater detail in our tariff but, generally speaking, for  
10 shorter main extension projects for Residential customers that will use natural  
11 gas as their primary heat source, the free footage allowance would apply (80 feet  
12 of main and 75 feet of service), such that no CIAC would be owed by the  
13 customer. For longer main extensions to Residential customers, the Residential  
14 Extension Model (REM) would be used to determine the amount of CIAC  
15 owed. The REM is designed to calculate the total revenue requirement for each  
16 year of the book service life of the project and is addressed in Gas Rate Book  
17 Section No. 6 (General Rules and Regulations) on Sheet No. 18.01, Section 5.3  
18 (Residential Main Extension Policy). For Commercial customers, the Company  
19 performs an economic feasibility study for the gas main or service line  
20 extension. If the cost for the gas main or service extension is greater than the  
21 expected revenue from the Commercial customer, then the Company charges  
22 the customer CIAC for the installation costs that exceed the break-even point.  
23 This is described in more detail in Gas Rate Book Section No. 6 on Sheet No.  
24 17.1, Section 5.2 (Commercial and Industrial Service and Main Extension  
25 Policy).  
26

27 Q. HAS THE FREE FOOTAGE ALLOWANCE FOR RESIDENTIAL CUSTOMERS BEEN  
28 UPDATED RECENTLY?

1 A. Yes. As part of the Settlement Agreement in the Company's 2022 gas rate  
2 case (Settlement Agreement),<sup>1</sup> the Company agreed to reduce the Residential  
3 free footage allowance for main line extensions from 100 feet to 80 feet, while  
4 maintaining the 75-foot allowance for new service extensions. The Settlement  
5 Agreement also provided that further exploration of the Company's main and  
6 service line extension policies would be addressed in the Future of Gas  
7 Docket.<sup>2</sup> In approving the Settlement Agreement, the Commission's Order  
8 confirmed that the Future of Gas Docket is the appropriate forum for further  
9 discussion of free footage allowances:

10 The Commission's acceptance of the settlement in its entirety reflects  
11 no judgment on the merits of reducing free footage allowances  
12 generally and shall have no effect on the further exploration of line-  
13 extension policies in the Future of Gas Docket. The Commission  
14 reiterates its language from the CenterPoint rate case that the Future  
15 of Gas Docket "provides an appropriate forum for evaluating the  
16 parties' request to pursue these matters on an industry-wide basis."<sup>3</sup>  
17

18 Q. IS THE COMPANY PROPOSING ANY CHANGES TO THE FREE FOOTAGE  
19 ALLOWANCE IN THIS CURRENT RATE CASE?

20 A. No. Consistent with the Commission's direction, free footage allowance  
21 changes are currently being addressed in the Future of Gas Docket, and the  
22 Company is not proposing any changes in this rate case.

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<sup>1</sup> *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy's Petition for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G002/GR-21-678, COMPREHENSIVE AND UNANIMOUS SETTLEMENT AGREEMENT at 7 (October 4, 2022).

<sup>2</sup> *In the Matter of the Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals*, Docket No. G999/CI-21-565.

<sup>3</sup> *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy's Petition for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G002/GR-21-678, ORDER ACCEPTING AGREEMENT AND SETTING RATES AND UPDATING BASE COST OF GAS at 9 (April 13, 2023).

### III. COMPLIANCE REQUIREMENTS

Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?

A. In this section of my testimony, I address compliance requirements that arose from the following Commission proceedings:

- Docket No. G999/CI-90-563: *In the Matter of an Inquiry into Competition Between Gas Utilities in Minnesota.*
- Docket No. G002/GR-06-1429: *In the Matter of the Application of Northern States Power Company, a Minnesota Corporation and Wholly-Owned Subsidiary of Xcel Energy, Inc., for Authority to Increase Rates for Natural Gas Service in Minnesota.*
- Docket No. G002/GR-04-1511: *In the Matter of an Application by Northern States Power d/b/a Xcel Energy for Authority to Increase Rates for Natural Gas Service in the State of Minnesota.*
- Docket No. G002/GR-09-1153: *In the Matter of the Application of Northern States Power Company, a Minnesota Corporation, for Authority to Increase Rates for Natural Gas Service in Minnesota.*

#### A. Docket Nos. G999/CI-90-563 and G002/GR-06-1429 Compliance

Q. WHAT COMPLIANCE ITEMS DO YOU ADDRESS THAT CAME OUT OF THE COMMISSION'S March 31, 1995 ORDER IN DOCKET NO. G999/CI-90-563?

A. Docket No. G999/CI-90-563 addressed the Commission's concerns about the impact of service extension-related additions on gas utilities' rate base. Below, I provide information in compliance with the requirement for analysis of the Company's service and main extension projects to identify any uncollected CIAC amounts.<sup>4</sup> As also shown below, this analysis results in a minor

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<sup>4</sup> See *In the Matter of an Inquiry into Competition Between Gas Utilities in Minnesota*, Docket No. G999/CI-90-563, ORDER TERMINATING INVESTIGATION AND CLOSING DOCKET at 7 (March 31, 1995).

1 adjustment to the revenue requirement in this rate case, which is addressed in  
2 the Direct Testimony of Company witness Benjamin C. Halama.

3  
4 I note that the Commission's Order in Docket No. G999/CI-90-563 also  
5 required that all gas utilities provide other specific reporting on service  
6 extension tariffs and policies in future gas rate cases.<sup>5</sup> However, in the  
7 Company's 2024 Gas Rate Case, the Commission granted the Company's  
8 request for relief from these specific reporting requirements because the  
9 underlying issues are being addressed in other Commission proceedings.<sup>6</sup>  
10

11 Q. PLEASE DESCRIBE THE COMPANY'S ANALYSIS OF HISTORICAL SERVICE AND  
12 MAIN EXTENSION PROJECTS.

13 A. To assess the Company's application of its extension tariffs and determine  
14 whether CIAC was properly charged and collected, studies were conducted  
15 under my direction to examine service and main extension projects constructed  
16 during the 2023-2024 time period.  
17

18 Q. PLEASE DESCRIBE THE COMPANY'S ANALYSIS OF ITS SERVICE AND MAIN  
19 EXTENSION PROJECTS.

20 A. The Company examined service and main extensions for January 2023 through  
21 December 2024. The studies were developed with a methodology similar to that  
22 used in the Company's last three natural gas rate cases (Docket Nos. G002/GR-

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<sup>5</sup> See *In the Matter of an Inquiry into Competition Between Gas Utilities in Minnesota*, Docket No. G999/CI-90-563, ORDER TERMINATING INVESTIGATION AND CLOSING DOCKET at 6-7 (March 31, 1995).

<sup>6</sup> See *In the Matter of the Application of Northern States Power Company, d/b/a Xcel Energy, for Authority to Increase Rates for Natural Gas Service in Minnesota*, Docket No. G002/GR-23-413, SETTLEMENT AGREEMENT, Section III.H.3. at 21 (Jun. 26, 2024), FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATION TO APPROVE SETTLEMENT (Oct. 25, 2024), and ORDER ACCEPTING AND ADOPTING AGREEMENT AND SETTING RATES (Mar. 5, 2025).



09-1153, G002/GR-21-678, and G002/GR-23-413). This approach involved first establishing the total population of service and main extension projects during the noted periods, as included in Table 1 below.

**Table 1**  
**Total Population of Service and Main Extensions (2023-2024)**

Service Extensions Total Projects	Main Extensions Total Projects
7,883	150

Q. WHAT WAS THE NEXT STEP IN THE ANALYSIS?

A. The next step was to determine samples of projects. A sample was selected from each of the service and main project populations for the above-noted timeframes. The decision to draw samples for testing was based on the central limit theorem.<sup>7</sup> The sample sizes each were in excess of 30 projects, the acceptable minimum under the central limit theorem. We believe this sampling approach provides a supportable conclusion regarding the test population and is comparable with previous sampling methodologies utilized in the Company's previous three rate cases.

A sample of service extension projects was determined by selecting the top five projects by cost per year, then choosing a random sample of 35 projects per year. Similarly, a sample of main extension projects was determined by selecting the top five projects by cost per year, then choosing a random sample of 35 projects per year.

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<sup>7</sup> "According to the central limit theorem, for large sample sizes (typically, 30 is a reasonable minimum size), the distribution sample mean tends to be normally distributed, almost independently of the shape of the original population." (Guy, Dan M., D.R. Carmichael, and O. Ray Whittington. Audit Sampling: An Introduction. Fifth Edition. New York: John Wiley & Sons, Inc., 2001 at 97.)

1 Q. AFTER THE SAMPLES WERE SELECTED, WHAT WAS THE NEXT STEP?

2 A. For each project included in the service extension samples, we reviewed all  
3 documentation, including service orders, construction drawings, and work  
4 orders, to determine whether the service extension tariff was applied correctly  
5 for the 2023-2024 period. Where CIAC was identified, we also confirmed that  
6 it was correctly charged and collected from customers.

7  
8 For each project included in the main extension samples, we reviewed the  
9 documentation to determine if the cost justification tariff was accurately applied  
10 from January 2023 through December 2024 for commercial projects. For  
11 residential projects, we determined if the footage allowance from January 2023  
12 through December 2024 was accurately applied. Where CIAC was identified,  
13 we also confirmed whether or not it was collected from customers.

14  
15 Q. BASED ON THIS ANALYSIS, WHAT AMOUNT OF CIAC DID THE COMPANY  
16 DETERMINE WAS UNCOLLECTED FOR SERVICE EXTENSIONS FOR 2023 AND 2024?

17 A. The amount of CIAC not collected (or for which records were not available)  
18 for 2023-2024 service extensions totaled \$185,953, or 7.7 percent of the total  
19 CIAC owed for that period. Exhibit\_\_\_\_(GET-1), Schedule 2 summarizes the  
20 results of the service extension study.

21  
22 Q. BASED ON THIS ANALYSIS, WHAT AMOUNT OF CIAC DID THE COMPANY  
23 DETERMINE WAS UNCOLLECTED FOR MAIN EXTENSIONS FOR 2023 AND 2024?

24 A. The amount of CIAC not collected (or for which records were not available)  
25 for 2023-2024 main extensions totaled \$18,262, or 4.5 percent of the total CIAC  
26 owed for that period. Exhibit\_\_\_\_(GET-1), Schedule 3 summarizes the results  
27 of the main extension study.

1 Q. TO WHAT DO YOU ATTRIBUTE THE ABOVE-NOTED UNCOLLECTED CIAC?

2 A. During the time period under review, the uncollected CIAC was due to  
3 transition of an employee to a different department, and the follow-up on CIAC  
4 collections for a limited number of projects was inadvertently missed while we  
5 were hiring a replacement. Since then, we have implemented new tracking  
6 procedures to monitor all CIAC activity, which will help prevent similar issues  
7 in the future.

8  
9 Q. ARE THERE ANY OTHER COMPLIANCE REQUIREMENTS RELATED TO CIAC THAT  
10 YOU ADDRESS?

11 A. Yes. Order Point 10 of the Commission's September 10, 2007 Order in Docket  
12 No. G002/GR-06-1429 relates to the Company's tariff, Section 6, General  
13 Rules and Regulations, Section 5.1, Extension Policy, Sheet 6-17, which  
14 provides that the Company shall waive CIAC of \$5.00 or less, and that the  
15 Company cannot at any time recover these costs from existing customers. The  
16 Company reviewed waiver of CIAC fees of \$5.00 or less and found no waivers  
17 in 2023 or 2024.

18  
19 Q. IS THE COMPANY PROPOSING ANY ADJUSTMENT TO RATE BASE FOR THESE  
20 UNCOLLECTED CIAC AMOUNTS?

21 A. Yes. Company witness Halama makes an adjustment to rate base for the above-  
22 noted uncollected CIAC amounts for 2023-2024 service and main extensions,  
23 as noted in his Direct Testimony.

24  
25 **B. Docket Nos. G002/GR-04-1511 and G002/GR-09-1153 Compliance**

26 Q. WHAT ARE THE COMPLIANCE REQUIREMENTS STEMMING FROM DOCKET NOS.  
27 G002/GR-04-1511 AND G002/GR-09-1153 THAT YOU ADDRESS IN THIS  
28 SECTION?

1 A. In Docket No. G002/GR-04-1511, the Company agreed to retain records of  
2 unusual construction charges and unusual winter construction charges.  
3 Subsequently, the Commission's Order in the Company's 2009 gas rate case  
4 (Docket No. G002/GR-09-1153) adopted the Administrative Law Judge's  
5 Report, Finding 307, which recommended the Company be required to  
6 continue tracking information relating to unusual construction charges, as well  
7 as joint trenching practice and the waiver of CIAC in competitive situations.  
8 This information was required to be tracked in advance of the Company's next  
9 natural gas rate case, which was Docket No. G002/GR-21-678. An extension  
10 of these requirements was not specifically addressed in Docket No. G002/GR-  
11 21-678 or in our most recent gas rate case (Docket No. G002/GR-23-413), but  
12 we again address each of these requirements below for completeness.

13  
14 *1. Unusual Construction Charges*

15 Q. PLEASE DESCRIBE THE TRACKING REQUIREMENTS RELATED TO UNUSUAL  
16 CONSTRUCTION CHARGES AND UNUSUAL WINTER CONSTRUCTION CHARGES.

17 A. In Docket No. G002/GR-04-1511, the Company agreed to retain records of  
18 unusual construction charges and unusual winter construction charges. We  
19 continue to track data for each unusual construction charge as contained in each  
20 project Work Order. Data for joint trench residential developments is provided  
21 by vendors via a winter construction form. Charges are billed to the developer  
22 and recorded on a tracking spreadsheet along with payment confirmation. Data  
23 for non-joint trench underground residential developments is identified by  
24 Charge Code, Debtor ID, and Contract in the CRS billing system, and queries  
25 of the data for a given timeframe list the transactions by invoice number.  
26 Individual entries can be reviewed in the CRS system to determine charges.

1                   2.     *Joint Trenching Practice*

2     Q.   PLEASE DESCRIBE THE TRACKING REQUIREMENTS RELATED TO JOINT  
3        TRENCHING.

4     A.   In Docket No. G002/GR-06-1429, the Company agreed to show that it revised  
5        its natural gas extension records to clearly indicate when a joint trench or utility  
6        corridor was used for joint electric and natural gas extension projects. The  
7        Company was also required to provide reports for two years demonstrating  
8        compliance with the joint trenching provisions contained in Section 6,  
9        subsection 5.4 of NSPM's Gas Rate Book.<sup>8</sup> This requirement was extended in  
10       the Company's 2009 gas rate case (Docket No. G002/GR-09-1153). We  
11       continue to track data for joint electric and natural gas extension projects as part  
12       of each project Work Order. The Company uses an enterprise Work and Asset  
13       management system (SAP) integrated with a Geospatial Information System  
14       (GIS) to track joint trench locations as work is being completed in the field.  
15       Costs associated with this work are captured via work order documentation and  
16       data associated with the work order record. An audit of the CIAC aspect of the  
17       joint trench data has also been conducted and is discussed earlier in my  
18       testimony. This process and corresponding technology allow us to confirm the  
19       data required to meet this requirement is complete.

20  
21                   3.     *Waiver of CIAC in Competitive Situations*

22     Q.   NSPM'S TARIFF REQUIRES THE COMPANY TO MAKE A RATE BASE ADJUSTMENT  
23        IF IT WAIVED THE COLLECTION OF OTHERWISE APPLICABLE CIAC AS A RESULT  
24        OF A PROMOTION. DID THE COMPANY INVESTIGATE WHETHER SUCH A  
25        PROMOTION OCCURRED?

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<sup>8</sup> *In the Matter of the Application of Northern States Power Company, a Minnesota Corporation and Wholly-Owned Subsidiary of Xcel Energy, Inc., for Authority to Increase Rates for Natural Gas Service in Minnesota*, Docket No. G002/GR-06-1429, COMPLIANCE FILING – GAS RATE CASE, JOINT TRENCH (February 26, 2010 and March 5, 2009).

1 A. Yes. We have investigated this and determined the Company has not offered  
2 such promotions since the Commission's September 19, 2018 Order (2018  
3 Order) in Docket No. G999/CI-17-499. In the 2018 Order, the Commission  
4 decided that "natural gas utilities are prohibited from offering cash or noncash  
5 promotional incentives on a prospective basis."<sup>9</sup> Before this decision, when the  
6 Company was competing with another utility for the right to provide natural  
7 gas service, we used promotional funds to pay for the CIAC amount otherwise  
8 owed by the customer. The promotional funds paid reduced the investment  
9 recorded to rate base in the same manner as CIAC payments. More specifically,  
10 these payments were charged to the account entitled "Non-Recovery  
11 Construction Waiver Gas Funds," a below-the-line account, and none of the  
12 waiver costs were charged to customers.

13  
14 Q. HAS THE COMPANY COMPLIED WITH THE COMMISSION'S 2018 ORDER AGAINST  
15 PROMOTIONAL INCENTIVES?

16 A. Yes. The Company has not offered promotional funds to customers since the  
17 Commission's 2018 Order.<sup>10</sup> The Company has also complied with the  
18 Commission's 2018 Order by removing its Competitive Agreement from its  
19 Gas Rate Book. Only grandfathered agreements that contained promotional  
20 funds provisions executed prior to the Commission's 2018 Order have been  
21 charged to the account entitled "Non-Recovery Construction Waiver Gas  
22 Funds."

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<sup>9</sup> *In the Matter of a Commission Investigation into Parameters for Competing Among Natural Gas Utilities Involving Duplication of Facilities and Use of Promotional Incentives and Other Payments*, Docket No. G999/CI-17-499, ORDER ADOPTING STANDARDS GOVERNING COMPETITION AMONG NATURAL GAS UTILITIES at 11 (September 19, 2018).

<sup>10</sup> *Ibid.*, ORDER DISMISSING COMPLAINT, SUSPENDING TARIFF, AND SOLICITING COMMENT at 9 (April 10, 2018).

#### IV. PROPOSED TARIFF REVISIONS

Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?

A. In this section of my testimony, I discuss proposed minor tariff revisions in Gas Rate Book Section 7, Contract and Agreement Forms, related to the Underground Gas and/or Electric Distribution Agreement, and correction of a typographical error in the Natural Gas Service Agreement – Commercial and Industrial Service.

Q. WHAT REVISIONS IS THE COMPANY PROPOSING TO THE UNDERGROUND GAS AND/OR ELECTRIC DISTRIBUTION AGREEMENT?

A. The Company proposes changes to the Underground Gas and/or Electric Distribution Agreement to refer to the standards manuals on the Company's website, rather than including specific clearance distances or other safety-related requirement details in the tariff sheets. These are the same revisions proposed in the Company's currently pending electric rate case (Docket No. E002/GR-24-320), but the Company is requesting this update to the Gas Rate Book in this case.

Q. WHY IS THE COMPANY PROPOSING THESE CHANGES?

A. The proposed changes to refer to the standards manuals on the Company's website promote efficiencies because when standards are updated, those changes will not require corresponding requests for changes to tariff sheets. In this way, customers are always directed to the most current standards. Specific clearance requirements are found in the Xcel Energy Installation Utility Standards manual available on the Company's website.<sup>11</sup>

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<sup>11</sup> The standards manual is available at: <https://www.xcelenergy.com/staticfiles/xcel-energy/Responsive/Assets/Managed%20Documents%20&%20PDFs/Xcel-Energy-Standard-For-Electric-Installation-and-Use.pdf>, and a link to the manual can also be found on the Xcel Energy Builders webpage at: <https://mn.my.xcelenergy.com/s/partner-resources/build-remodel/construction>.

1 For the tariff revisions discussed above, see Gas Rate Book Sheet Nos. 7-31,  
2 7-32, and 7-33 included in Volume 2D of the rate case application.

3  
4 Q. PLEASE DESCRIBE THE CORRECTION OF THE TYPOGRAPHICAL ERROR YOU  
5 MENTIONED ABOVE.

6 A. The Company proposes to remove a dollar sign (\$) inadvertently included in  
7 one line in the Natural Gas Service Agreement – Commercial and Industrial  
8 Service. That line refers to total load rather than a dollar amount.

9  
10 For the tariff revision discussed above, see Gas Rate Book Sheet No. 7-7.1  
11 included in Volume 2D of the rate case application.

## 12 13 **V. CONCLUSION**

14  
15 Q. PLEASE SUMMARIZE THE RECOMMENDATION YOU MAKE IN YOUR DIRECT  
16 TESTIMONY.

17 A. I recommend that the Commission approve the Company's proposed minor  
18 revisions to the Underground Gas and/or Electric Distribution Agreement.

19  
20 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

21 A. Yes.



## GEROLD TRAUT

GEROLD.E.TRAUT@XCELENERGY.COM

### Manager, Gas Business Development

#### EXPERIENCE

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2025 - Present

##### **Manager, Gas Business Development**

Responsible for the Minnesota and North Dakota Gas Business Development Team within NSPM Community Relations. My current responsibilities include developing and implementing new growth policies, investment analysis and approval processes for new customers, and general oversight and budgeting related to new gas business investments. In addition, I support large gas customer services in Account Management including interruptible, large firm, and large transportation customer offerings.

2016-2025

##### **Account Executive, Builder Developer Representative**

Xcel Energy

Responsibilities: Liaison with Builders and Developers, Project Management, Sales, Marketing, Project Justification, Gas Contracts and Agreements, MN Gas Rate Case, Competitive Gas Projects, growing the MN Gas Territory

1999 - 2016

##### **Senior Territory Representative**

Xcel Energy

Promoting, Marketing, and selling natural gas service to commercial and residential customers; natural gas territory management; manage and secure competitive projects; writing competitive offers, contracts, and agreements; resolving customer service issues and complaints; facilitate builder/developer and trade allies' meetings.

1997-1999

##### **Gas Technician Specialist**

NSP

1995-1997

##### **Journeyman Service Person**

NSP

1991 – 1997

##### **Journeyman Construction Person**

NSP

#### EDUCATION

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1990

##### **St Cloud State University**

Bachelor of Science – Environmental Technology and Management

##### **Carlson School of Management**

Negotiations Certificate

##### **Gas Technology Institute, Chicago, IL**

Registered Commercial Gas Consultant

Customer Contribution-in-Aid-of Construction (CIAC) Audit Results  
Service Extensions: 2023-2024

Population	A	B							
	No. of Projects	Total Cost							
Total Service Projects	7,883	\$	17,172,227						
Sample	C	D		E	F	G	H	I=G÷D	J=H÷D
	No. of Projects	Sample Cost		CIAC Identified	CIAC Billed/Collected	CIAC Not Collected	CIAC Over-Collected	% of CIAC Not Collected	% of CIAC Over-Collected
Top 5 Projects by cost per year	10	\$	304,153	\$ 13,545	\$ 8,335	\$ 5,210	\$ -	1.71%	0.00%
Random Sample, 35 per year	70	\$	183,624	\$ 54,845	\$ 54,773	\$ 72	\$ -	0.04%	0.00%
TOTAL Adjustment for Service Projects	80	\$	487,777	\$ 68,390	\$ 63,108	\$ 5,282	\$ -	1.75%	0.00%
sample cost % of CIAC (E÷D)				14.02%		7.72% CIAC not collected (G÷E)			
Cost of service ext				\$	17,172,227				
assumed CIAC %					14.02%				
assumed extrapolated CIAC				\$	2,407,675				
assumed CIAC % not collected					7.72%				
assumed extrapolated CIAC not collected				\$	185,953.22				
Waiver of CIAC fees less than \$5.00				\$	-				
				\$	185,953.22	Rate Base Reduction			

Customer Contribution-in-Aid-of Construction (CIAC) Audit Results  
Main Extensions: 2023-2024

Population	A	B							
	No. of Projects	Total Cost							
Total Main Projects	150	\$	5,249,037						
Sample	C	D		E	F	G	H	I=G÷D	J=H÷D
	No. of Projects	Sample Cost		CIAC Identified	CIAC Billed/Collected	CIAC Not Collected	CIAC Over-Collected	% of CIAC Not Collected	% of CIAC Over-Collected
Top 5 Projects by cost per year	10	\$	1,432,438	\$ 62,093	\$ 62,093	\$ -	\$ -	0.00%	0.00%
Random Sample, 35 per year	70	\$	1,967,312	\$ 198,246	\$ 186,418	\$ 11,828	\$ -	0.60%	0.00%
TOTAL Adjustment for Main Projects	80	\$	3,399,750	\$ 260,339	\$ 248,511	\$ 11,828	\$ -	0.60%	0.00%
sample cost % of CIAC (E÷D)				7.66%		4.54% CIAC not collected (G÷E)			
Cost of service ext				\$	5,249,037				
assumed CIAC %					7.66%				
assumed extrapolated CIAC				\$	401,950				
assumed CIAC % not collected					4.54%				
assumed extrapolated CIAC not collected				\$	18,261.82				
Waiver of CIAC fees less than \$5.00				\$	-				
				\$	18,261.82	Rate Base Reduction			