



November 17, 2025

—Via Electronic Filing—

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

RE: REPLY COMMENTS

NEW BASE COST OF GAS

DOCKET NO. G002/MR-25-357

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to the November 12, 2025 Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the above-referenced docket. In their Comments, the Department recommended that the Commission approve the Company's Base Cost of Gas Petition, subject to review of additional information requested in Reply Comments explaining how Xcel Energy calculated the demand gas costs including identification of the demand entitlement units that were used.

We appreciate the Department's review of our Petition. The Department asked that we explain the calculation of our demand costs and their relation to our annual contract demand entitlements (CD) filings. The Company calculated the demand costs for the Base Cost of Gas Petition based on the demand entitlement contracted rates and design day demand level units in the most recent CD filing. However, the Base Cost of Gas Petition and the CD filing include demand costs of \$124.7 million and \$105.4 million, respectively. There are two main differences between the filings. First, the Base Cost of Gas includes demand costs of approximately \$14 million of interstate storage capacity costs. These costs are considered demand costs in the Company's budgeting process, from which the Base Cost of Gas is derived. However, the CD filing does not include these as demand costs. Instead, they are treated as commodity costs as ordered by the Commission.²

¹ Docket No. G002/M-25-67, August 1, 2025 Petition, Costs effective January 1, 2026.

² Docket Nos. G002/M-07-1395, G002/M-08-1315, G002/M-09-1287, G002/M-10-1163, G002/M-11-1076, G002/M-12-862, and G002/M-13-663, Item 4 in ORDER dated June 9, 2014.

The second major difference between the Base Cost of Gas and the CD filing is the timeframe covered. The CD filing in Docket No. G002/M-25-67 covers November 2025 through October 2026, while the Base Cost of Gas covers calendar year 2026. On July 1, 2025 Northern Natural Gas (Northern) filed a general section 4 rate case³ with the Federal Energy Regulatory Commission (FERC) to increase rates effective January 1, 2026. With the timing of the Northern rate increase, the Base Cost of Gas includes twelve (12) months at the higher rates, while the CD filing includes November and December 2025 at the former (lower) rates and 10 months at the higher rates. This is a difference of approximately \$4 million.

We agree to the Department's recommendation to provide updated cost of gas information in this docket and in Docket No. G002/GR-25-356, our companion natural gas rate case. In addition, we will work with Commission and Department staff to determine the timing and whether the updated information should be applied to our base cost of gas and our rate case.

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 amber.r.hedlund@xcelenergy.com or Lynnette Sweet at lynnette.m.sweet@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

AMBER R. HEDLUND MANAGER, REGULATORY AFFAIRS

cc: Service List

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³ RP25-989

CERTIFICATE OF SERVICE

- I, Victor Barreiro, I have this day served copies of the foregoing document on the attached list of persons.
 - <u>xx</u> 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 NO. G002/MR-25-357

Dated this 17th day of November 2025

/s/

Victor Barreiro Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	Trade	Service List Name
1	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	MR-25- 357
2	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall FI 5 Minneapolis MN, 55401 United States	Electronic Service		No	MR-25- 357
3	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	MR-25- 357
4	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	MR-25- 357
5	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	MR-25- 357
6	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	MR-25- 357
7	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	MR-25- 357
8	Robert S.	Carney, Jr.				4232 Colfax Ave. S. Minneapolis MN, 55409 United States	Paper Service		No	MR-25- 357
9	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119- 2044 United States	Electronic Service		No	MR-25- 357
10	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	MR-25- 357
11	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	MR-25- 357
12	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	MR-25- 357
13	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of		332 Minnesota St	Electronic Service		No	MR-25- 357

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Minnesota		Ste W1360 Saint Paul MN, 55101 United States				
14	Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy		414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	MR-25- 357
15	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101- 2198 United States	Electronic Service		No	MR-25- 357
16	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	MR-25- 357
17	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402- 1425 United States	Electronic Service		No	MR-25- 357
18	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	MR-25- 357
19	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	MR-25- 357
20	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	MR-25- 357
21	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	MR-25- 357
22	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	MR-25- 357
23	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	MR-25- 357
24	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	MR-25- 357

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
25	Michael	Kaphing	michael.w.kaphing@xcelenergy.com	Xcel Energy		414 Nicollet Mall (401-8th Floor) Minneapolis MN, 55401 United States	Electronic Service		No	MR-25- 357
26	Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	MR-25- 357
27	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	MR-25- 357
28	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	MR-25- 357
29	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	MR-25- 357
30	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	MR-25- 357
31	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07- MCA Minneapolis MN, 55401 United States	Electronic Service		No	MR-25- 357
32	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	MR-25- 357
33	Greg	Merz	greg.merz@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	MR-25- 357
34	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	MR-25- 357
35	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul MN, 55164- 0620 United States	Electronic Service		No	MR-25- 357

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
36	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	MR-25- 357
37	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	MR-25- 357
38	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Ste 1400 Saint Paul MN, 55101 United States	Electronic Service		No	MR-25- 357
39	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	MR-25- 357
40	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	MR-25- 357
41	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	MR-25- 357
42	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	MR-25- 357
43	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	MR-25- 357
44	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	MR-25- 357
45	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	MR-25- 357
46	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	MR-25- 357
47	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	MR-25- 357
48	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN,	Electronic Service		No	MR-25- 357

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55104 United States				
49	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	MR-25- 357